APPENDIX B – COMMENTS AND RESPONSES

The Stanislaus Council of Governments, as the Regional Transportation Agency, has reviewed the comments received on the Draft 2018 Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS) and has prepared written responses to the written and verbal comments received. The draft 2018 RTP/SCS was circulated for a 55-day public review period that began May 11, 2018 and was scheduled to conclude on July 5, 2018. Comments to the draft Programmatic Environmental Impact Report (EIR) are addressed in the Final Environmental Impact Report (FEIR) document.

The comment letters included herein were submitted by public agencies, private organizations, and private citizens. Verbal comments were received at the first public hearing on the Draft 2018 RTP/SCS at the StanCOG Policy Board Meeting on June 20, 2018. Additional comments were received on the second public hearing on the draft 2018 RTP/SCS at the StanCOG Policy Board Meeting on July 18, 2018.

Each comment that StanCOG received is included in this section. The comment letters have been numbered, and each issue within a comment letter, if more than one, has a number assigned to it (For example, letter 1, comment 2 is referenced as 1.2). Each comment letter is reproduced in its entirety with the issues of concern numbered in the right margin. References to the responses to comments identify the letter number, and second the numbered comment.

Commenters on the draft 2018 RTP/SCS include public agencies and private entities. In total, StanCOG received 16 comments as either letters, e-mails or verbal comments during the public hearings. The commenters are listed in Table 1.
Table 1 – Comments received regarding the draft 2018 RTP/SCS

<table>
<thead>
<tr>
<th>Letter No. and Commenter</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 Lori Wolf, Secretary, Wood Colony Municipal Advisory Committee</td>
<td>05-11-2018</td>
</tr>
<tr>
<td>2 Diana Lynn Kaysen, Public</td>
<td>05-14-2018</td>
</tr>
<tr>
<td>3 Miguel B. Donoso, Patterson Action Committee</td>
<td>05-17-2018</td>
</tr>
<tr>
<td>4 Public Hearing #1 Comments</td>
<td>06-20-2018</td>
</tr>
<tr>
<td>5 Miguel B. Donoso, Patterson Action Committee</td>
<td>06-20-2018</td>
</tr>
<tr>
<td>6 Ella Wise, State Policy Associate, ClimatePlan</td>
<td>06-20-2018</td>
</tr>
<tr>
<td>7 Ella Wise, State Policy Associate, ClimatePlan</td>
<td>06-21-2018</td>
</tr>
<tr>
<td>8 Tom Dumas, Office of Metropolitan Planning, Department of Transportation</td>
<td>06-25-2018</td>
</tr>
<tr>
<td>9 Ray Dias, P.E.</td>
<td>06-25-2018</td>
</tr>
<tr>
<td>10 Patricia Cousins and Michael Cousins, Public</td>
<td>06-30-2018</td>
</tr>
<tr>
<td>11 S. M. Coakley, Public</td>
<td>07-03-2018</td>
</tr>
<tr>
<td>12 Yolanda Park, Catholic Charities</td>
<td>07-05-2018</td>
</tr>
<tr>
<td>13 Patrick Cavanah, Stanislaus County Environmental Review Committee</td>
<td>07-05-2018</td>
</tr>
<tr>
<td>14 Scott Morgan, Governor’s Office of Planning and Research, State Clearinghouse</td>
<td>07-06-2018</td>
</tr>
<tr>
<td>15 Public Hearing #2 Comments</td>
<td>07-18-2018</td>
</tr>
<tr>
<td>16 Miguel B. Donoso, Patterson Action Committee</td>
<td>07-18-2018</td>
</tr>
</tbody>
</table>
Hi Debbie, I was online reviewing your Public Participation Plan and would like to have the newly formed Wood Colony MAC added to the list of Macs. I can't find us on it anywhere on the list of Community Presentations and Stakeholders where the other MACs are shown. Also I think the dates on Page 9 should reflect 2018 targets, not 2017? Our MAC meets the second Wednesday of each month unless notified otherwise, at Hart Ransom Elementary School, 3930 Shoemaker Ave. at 7 pm in the new cafeteria building.

Please feel free to let me know if you have any questions.

Lori Wolf
Secretary, Wood Colony Municipal Advisory Council
209-578-0898 home209-479-8030 cell
Letter 1

COMMENTS: Lori Wolf

DATE: May 11, 2018

RESPONSE:

Response 1.1

The commenter requests that the Wood Colony Municipal Advisory Committee be added to the list of Municipal Advisory Committees contained in the Public Participation Plan component of the 2018 RTP/SCS.

The commenter refers to a list of Municipal Advisory Committees (MACs) on page 9 of the Draft PPP. This list is located in Appendix A of StanCOG’s 2018 PPP, which contains the Draft 2018 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) Public Participation Plan (PPP). The Wood Colony MAC will be added to a list of stakeholders for future public outreach activities.

Response 1.2

The commenter also indicates that the dates included in the Public Participation Plan should reflect 2018 participation targets and not 2017.

Comment noted.
Please share any comments regarding tonight's workshop or the RTP/SCS Environmental Impact Report:

- dianalynnkaysen@yahoo.com
- Requesting State Goals and Performance Measures
- Thank You Board
- Section 2: Infill and Redevelopment
- Board General Plan
Letter 2

COMMENTER: Diana Lynn Kaysen

DATE: May 14, 2018

RESPONSE:

Response 2.1

The commenter requests the “Goals and Performance Measures,” “Infill and Redevelopment” and “General Plan Trend” boards.

StanCOG provided these boards to the commenter via e-mail on June 19, 2018.
To: Debbie Troyillo, Planning Technician of Stan,

From: Miguel B. Donoso, Pattern Action Committee member,

Subject: The Draft 2018 Public Participation Plan for Review

The members of Pattern City community want to participate in the Public Participation Plan; but we need the agency of StanCog, to have a meeting in the city of Patterson, for the residents that are monolingual, have the opportunity to receive and have the information in Spanish for the open process that provides opportunities for input in the regional planning, policy, and decision-making efforts.

[Signature]
M. B. D.
Member of the Pattern Action Committee

C.C. CalP
C.C. State Dept of Transportation

(209) 395-6741
or 1220 La Loma Ave
At. 19, Modesto, CA 95354
UNABLE TO WORK DUE to injury or illness? Call Bill Gordon & Assoc, Social Security Disability Advocates! FREE Evaluation. Local Attorneys Nationwide 1-844-879-3267. Mail: 2420 N St NW, Washington, DC, Office: Braward Co FL (TX/NM/Bk) (Cal/SCAN)

Legals

5

PUBLIC NOTICE

FICTIONIOUS BUSINESS NAME STATEMENT 2018-1055

The following person (persons) is (are) doing business as: Brick and Mortar. 1312 Cougar Creek Dr., Patterson, CA 95363
Stanislaus County
Robert Jackson
712 Beck Creek Drive
Patterson, CA 95363
Calista Bregha
1312 Cougar Creek Drive
Patterson, CA 95363
Lakish Callum
1465 Jake Creek Drive
Patterson, CA 95363
Shequita Jackson
712 Beck Creek Drive
Patterson, CA 95363
This business is conducted by a California General Partnership. The registrant commenced to transact business under the fictitious business name or names listed above n/a.
/s/ Robert Jackson, Calista Bregha 5/3/10, 17, 24

PUBLIC NOTICE

POB 9725
PUBLIC NOTICE

NOTICE IS HEREBY GIVEN that StancoG. will hold a 45-day public review and comment period that will commence on April 9, 2018, and conclude on June 9, 2018. The draft document is available for review at StancoG Office, located at 1111 1st Street, Suite 308, Modesto, CA 95354 or www.stanco.g.org, regarding the Draft 2018 Public Participation Plan.

The PFP is meant to inform the public and other stakeholders about the plan StancoG. public participation process, how they can receive information from StancoG, and how they can provide input into regional planning, policy, and decision-making efforts. It sets forth the commitment to an open process that provides opportunities for input.

StancoG. will hold a public hearing to solicit comments by May 30, 2018, from 6:30 p.m. to 7:30 p.m. at the StancoG office building at 1111 1st Street, Suite 308, Modesto, California 95354.

Written comments received at the StancoG office by 3:00 p.m., June 12, 2018, will be made a part of the record.

Further information may be obtained by contacting Debbie Trujillo, Planning Technician, StancoG office, 1111 1st Street, Suite 308, Modesto, or by calling 252-4600.

The StancoG Policy Board is scheduled to adopt the 2018 Public Participation Plan at its June 20, 2018, Policy Board meeting. The Public Board meeting is to be held in the StancoG Policy Board Room located at 1111 1st Street, Suite 308, in Modesto, CA, at 6:00 PM.

Contact Person: Debbie Trujillo, Planning Technician, StancoG Office, 1111 1st Street, Suite 308, Modesto, CA 95354, 252-4600, dtrujillo@stanco.g.org

5/3/18

PUBLIC NOTICE

FICTIONIOUS BUSINESS NAME STATEMENT 2018-10913

The following person (persons) is (are) doing business as: Clemens Auto Repair, 9001 Hwy, 33, Westley, CA 95391, 1737 Gene Rd, Ceres, CA 95307
Stanislaus County
Ana Valeria Madera Vigil
1737 Gene Road
Ceres, CA 95307
This business is conducted by an Individual.

The registrant commenced to transact business under the fictitious business name or names listed above 4/10/2018.

Connie Madero-Vigil

5/3/18

PUBLIC NOTICE

STANISLAUS COUNCIL OF GOVERNMENTS (StancOG)

NOTICE OF PUBLIC HEARING AND COMMENT PERIOD

DRAFT 2018 PUBLIC PARTICIPATION PLAN

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Contact Person: Debbie Trujillo, Planning Technician, StancoG Office, 1111 1st Street, Suite 308, Modesto, CA 95354, 259-523-4600, dtrujillo@stanco.g.org

5/3/18
Letter 3

COMMENTER: Miguel Donoso, Patterson Action Committee

DATE: May 17, 2018

RESPONSE:

Response 3.1

The commenter states that residents of the City of Patterson want to be involved in the Public Participation Plan of the 2018 RTP/SCS. The commenter requests that StanCOG hold a meeting in Patterson and that documentation at the meeting be provided in Spanish.

StanCOG held the public workshop in Patterson for the 2018 RTP/SCS and interpreted the entire presentation in Spanish. Mr. Donoso was in attendance and StanCOG provided the Executive Summary in Spanish.

Response 3.2

The commenter states that public notice of the 2018 RTP/SCS Public Participation Plan was published in the Patterson Irrigator Newspaper only in English. The commenter asks how StanCOG is reaching the Hispanic population, which constitutes the majority of the population in Patterson.

The Patterson Irrigator is a local paper published in English. The Spanish language public notice was posted in the Vida en el Valle newspaper.
Draft 2018 RTP/SCS & PEIR Comments
June 20, 2018
Public Hearing at the StanCOG Policy Board Meeting, 6:00pm

1. Ella Wise, ClimatePlan
   a. **Language.** Requested Spanish translation of the plan.
   b. **VMT.** Compared business as usual (BAU) VMT to the plan and found that they had very little difference. Would like to see greater VMT reduction in this plan.

2. Thomas Helme, Valley Improvement Projects
   a. **VMT.** Concerned about VMT reductions when compared to business as usual versus the RTP/SCS new scenario. Only 1% difference, which is very small. Would like to see more improvements in this area.
   b. **Funding.** Would like to see a higher percentage of funding going towards active transportation projects in the future.
   c. **Public outreach.** Would like to see Spanish language access widened in the RTP/SCS public outreach efforts.

3. Edgar Garibay, Tuolumne River Trust
   a. **Technical language.** Would like the plan to be more accessible to the general public and use less acronyms and technical terms. Found the public outreach process difficult to follow and connect between transportation funding and land use scenario selection. Recommends StanCOG staff to work more closely with local community groups in a more non-technical manner through a survey.

4. Veronica Tovar, Catholic Charities Environmental Coordinator
   a. **Technical Language.** Found the RTP/SCS plan too technical and abstract. Special attention should be made to future efforts to reduce barriers to understanding the plan. Increase accessibility to local stakeholders and efforts to present abstract information that is comprehensible to everyone.
   b. **Language.** Would like to see the RTP/SCS completely translated into other languages highly spoken in the area, such as Spanish.

5. Elizabeth Claes, StanCOG Citizens Advisory Committee
   a. **Workshops.** Difficult to understand information presented at the Turlock Workshop. Would like to see more information presented on how the RTP/SCS will actually affect the public. Did not feel that the information was presented in common vernacular. Found the plan to have too many acronyms and technical details and should be changed to be understood better.
   b. **Air Quality.** Gave an example on how people with asthma care deeply about air quality and would like the plan to present a clear linkage on how reducing vehicle miles traveled would assist in greenhouse gas emission reductions.

6. Sandra de Alcuaz, Stanislaus Sustainable Communities Coalition
   a. **Action Plan.** Believes in business practices applied in government. Asks for an action plan for the greenhouse gas emission reductions. Noticed that in the draft plan, there is an Appendix called “Action Plan” but it only presents a project list. Wants to see a clear relationship between the goals of the plan to specific actions, along with a schedule for
implementation. Wants to see an implementation action plan to see how projects are vetted in terms of VMT reduction.

b. Performance Measures. Noticed that some performance indicators have been changed from the 2014 RTP/SCS, making it hard for the public to see just how many goals and objectives have been met since four years ago. Requested that in the future the performance indicators be standardized to be able to compare to previous plans and check progress.
Letter 4

COMMENTER: Public Hearing #1 Comments

DATE: June 20, 2018

RESPONSE:

Response 4.1

The commenter expressed a desire to have the plan translated in Spanish.

Comment noted.

Response 4.2

The commenter would like to see a greater VMT reduction in the plan and stated that the business as usual scenario had very little difference compared to the plan.

Comment noted.

Response 4.3

The commenter compares VMT reductions of the business as usual scenario against the RTP/SCS preferred scenario and states that a 1% difference is small and would like more improvements in this area.

Comment noted.

Response 4.4

The commenter has a desire to see more funding go towards active transportation projects in the future.

Comment noted.

Response 4.5

The commenter requested that public outreach efforts provide the Spanish speaking population with greater access.

StanCOG is committed to a policy of nondiscrimination in the conduct of its business and to the delivery of equitable and accessible transportation services. StanCOG seeks to engage minority, low-income, and elderly populations, persons with disabilities, and persons of limited English proficiency in the development of transportation plans and technical studies to ensure environmental justice issues and analyses are specifically documented. StanCOG has held public workshops and hearings with the services of a Spanish language interpreter and has also provided RTP/SCS meeting materials in both English and Spanish during the development of the 2018 RTP/SCS and EIR.
Response 4.6

The commenter requested the plan use less acronyms and technical terms to help the public comprehend in a more non-technical manner and suggested using surveys.

Comment noted.

Response 4.7

The commenter found the RTP/SCS plan too technical and abstract.

Comment noted.

Response 4.8

Commenter expressed desire to have the plan translated in Spanish.

Comment noted.

Response 4.9

Commenter stated it was very difficult to understand information presented at the Turlock Workshop.

Comment noted.

Response 4.10

Commenter suggested the plan present a clear linkage on how reducing VMT would assist in greenhouse gas emissions.

Currently, the Stanislaus region contains local, regional, and inter-county transit services provided by four local transit operators. In addition to these transit services, other mobility services are available to Stanislaus County residents, including CalVans and Dibs. CalVans is a Public Transit Agency, sponsored by the California Vanpool Authority, which supplies qualified agricultural (farm) workers and drivers with safe, affordable vans to drive themselves and others to work. Dibs is a travel demand management program available in Stanislaus, San Joaquin, and Merced Counties that provides information about transportation options including carpooling, vanpooling, riding transit, biking, and walking. The program promotes sustainability by educating and encouraging commuters to consider other alternate modes of transportation to enhance air quality and reduce congestion.

Response 4.11

Commenter requested the plan include an action plan to create a clear correlation between the goals of the plan to specific actions.

Comment noted.
Response 4.12

Commenter stated that some performance indicators have been changed from the 2014 RTP/SCS, making it hard for the public to see how many goals and objectives have been met since the last plan update and requested that future performance indicators be standardized to be able to compare to previous plans and check progress.

Goals and objectives, along with associated performance measures are developed with each RTP/SCS update and are subject to change. Since the RTP/SCS is updated every four years, technology and data to compute metrics are ever evolving and subject to change. Therefore, a comparison of metrics between each RTP/SCS update is not always feasible. Additionally, the impacts of significant changes in land use and transportation reflected by a long range transportation plan typically occur over a longer period than the two to four years between plan updates. RTP/SCS plans are not meant to be compared with each update but rather to be evaluated as a long range 25-year transportation planning blueprint for the region.
To: StanCOG Policy Board
From: Miguel B. Donoso, Patterson Action Committee member
Date: 6/20/18
Subject: The Draft 2018 Public Participation Plan for Review.

We have 5 issues that is not in compliance with the Civil Rights laws:

1. We call 12 Runyoun Places in the Stanislaus area. To send people for the Review of the Plan 2018 Draft and from the 12 only one have the complete 4 books. I do not respond, that not have agency of minute.

2. The 9 Runyoun do not have the Resumes and Executive ACT/Sec5, 2018.

3. The Public Notice (May 3, 2018) Patterson Irrigator News, loss in English only. (Specific) the city of Patterson have 62% Hispanic and 48% monolingual.

4. I am May 17, 2018, we request the below @the agenda, comments. The report of the Draft 2018 and other materials in Spanish for the open process and decision making efforts.

5. We need that Executive Order 12898, Federal Register/ Vol. 59, in all this letter a), b), c), and d). From this again StanCOG, from 2014 ad continues to 2018 under the civil rights form.

C.C. - CRAA - Modesto Office
U.S. Dept of Transportation
1200 New Jersey Av, SE
Washington, DC 20590

Miguel B. Donoso
1770 La Loma, Apt 19
Modesto, CA 95354

RECEIVED
JUN 20 2018
STAN COG
**PUBLIC NOTICE**

**STANISLAUS COUNCIL OF GOVERNMENTS (StanCOG)**

**NOTICE OF PUBLIC REVIEW AND COMMENT PERIOD**

**DRAFT 2018 PUBLIC PARTICIPATION PLAN**

NOTICE IS HEREBY GIVEN that StanCOG will hold a 45-day public review and comment period that will commence on April 29, 2018, and conclude on June 12, 2018. The draft document is available for review at the StanCOG office, located at 1111, Street, Suite 308, Modesto, CA 95354 or www.stanco.org, regarding the Draft 2018 Public Participation Plan.

The PPP is meant to inform the public and other stakeholders about the overall StanCOG public participation process, how they can receive information from StanCOG, and how they can provide input into regional planning, policy, and decision-making efforts. It sets forth the commitment to an open process that provides opportunities for input.

StanCOG will hold a public hearing to solicit comments on May 30, 2018 from 6:00 p.m. to 7:00 p.m., at the StanCOG office building at 1111, Street, Suite 308, Modesto, California 95354.

Written comments received at the StanCOG office by 3:00 p.m., June 12, 2018, will be made a part of the record.

Further information may be obtained by contacting Debbie Trujillo, Planning Technician, StanCOG Office, 1111, Street, Suite 308, Modesto, or by calling 252-4600.

The StanCOG Policy Board is scheduled to adopt the 2018 Public Participation Plan on June 20, 2018. Policy Board meeting is to be held at StanCOG Policy Board Room located at 1111, Street, Suite 308, in Modesto, CA at 6:00 PM.

**Contact Person:**
Debbie Trujillo, Planning Technician
1111, Street, Suite 308
Modesto, CA 95354
209:525-4600
dtru@stanco.org

May 1, 2018

REQUEST FOR BIDS

The Patterson Joint Union School District (District) is accepting bids for general school supplies for the 2018-19 school year. It is the intent of the District to enter into an agreement with a vendor to be the provider of these supplies for the period starting the date of finalization of the agreement through June 30, 2019. The District wishes to make a one-time bulk purchase of the supplies listed in Attachment A. In addition, for the purposes of replenishment of stock, the District requests that these supplies be made available for purchase by the District at the price originally quoted in the bid for the duration of the agreement.

All supplies must meet the same or very similar specs as to be considered. If specs differ from those provided in Attachment A, please note this in the bid and provide the exact specifications of the supplies being offered.

Include the brand, product name, and any other identifying information for each item. The District will consider cost as a primary factor in making the purchase decision, but overall value and quality of the equipment may be considerations in the purchasing decision. The final purchase decision is contingent upon available funds, and the District reserves the right to cancel or reissue the RFP if circumstances warrant.

For a complete list of supplies, please visit our RFP section at www.patterson.k12.ca.us.

The deadline for receipt of bids is 4:00 PM PST, May 16, 2018. All bids must be received at the District Office by this deadline. Postmarked dates are not accepted.

Bids are to be delivered to U.S. Postal Service or in person to:

Patterson Joint Union School District
1111, Street, Suite 308
Modesto, CA 95354
209:525-4600
dtru@stanco.org

Questions regarding this Request for Bids should be addressed via e-mail to:

Patterson Joint Union School District
post @ patterson.k12.ca.us

May 1, 2018
To: Debbie Trujillo, Planning Technician of Stan COG

From: Miguel B. Donoso, Pattern Action Committee, member.

Subject: the Draft 2013 Public Participation Plan for Review

The members of Pattern city community want to participate in the Public Participation Plan, but we need the agency of Stan COG, to have a meeting in the city of Pattern, for the residents that are mostly Hispanic, have the opportunity to receive and have the document in Spanish for the open process that provides opportunities for input in the regional planning, policy, and decision making efforts.

M. B. Donoso, member of the Pattern Action Committee

(209) 345-6214
1220 La Loma Ave.
AFK 19, Modesto, CA 95354

C.C. CDLA
C.C. State Dept of Transportation

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Note: this information was prepared in the Pattern Action
New in English only, on May 3, 2018.
We need to see how the agency StanCOG is reaching The Hispanic community in Pattern. C.A.: The Hispanic in Pattern are 60% and for the 60%, 35% are unemployed.
Letter 5

COMMENTS:

COMMENTER: Miguel B. Denoso

DATE: June 20, 2018

RESPONSE:

Response 5.1

The commenter states that they contacted 12 public libraries in Stanislaus County to determine if the 2018 RTP/SCS was available for public review. The commenter states that two libraries did not reply, some only had agenda and minutes from meetings on the 2018 RTP/SCS, and only one of the libraries contacted had the complete 2018 RTP/SCS available. The commenter indicates that the complete RTP/SCS was not provided to the public.

The documents were available at the Stanislaus County Library, located at 1500 I Street, Modesto, California 95354. Additionally, as stated in public notices printed in both Spanish and English languages, the draft documents were available for review at the StanCOG office, located at 1111 I Street, Suite 308, Modesto, California 95354 and on the StanCOG website at www.stancog.org.

Response 5.2

The commenter states that a Spanish version of the Executive Summary of the 2018 RTP/SCS was not available at all public libraries in Stanislaus County.

Please refer to response 5.1.

Response 5.3

The commenter states that public notice pertaining to the 2018 RTP/SCS Public Participation Plan was published in the Patterson Irrigator Newspaper only in English, and provides a copy of the newspaper notice.

Please refer to response 3.2.

Response 5.4

The commenter states that they requested the 2018 RTP/SCS and other applicable Public Participation Plan materials, including meeting agenda and minutes made available in Spanish. The commenter restated their earlier requests and comments sent on May 17, 2018 as shown in letter 3 to the responses to comments.

Please refer to responses 3.1 and 3.2.
Response 5.5

The commenters state that they feel StanCOG has not complied with Section 5-5(a)-(d) of Executive Order 12898. The commenter states that StanCOG has discriminated against him. He has indicated that he plans to file a complaint to the U.S. Department of Transportation under the civil rights forum.

As stated in the 2018 StanCOG Public Participation Plan, StanCOG is committed to a policy of nondiscrimination in the conduct of its business and to the delivery of equitable and accessible transportation services. StanCOG seeks to engage minority, low-income, and elderly populations, persons with disabilities, and persons of limited English proficiency in the development of transportation plans and technical studies to ensure environmental justice issues and analyses are specifically documented. StanCOG has held its public workshops and public hearings providing the services of a Spanish language interpreter and also provided RTP/SCS meeting materials in both English and Spanish during the development of the 2018 RTP/SCS and EIR.

To ensure that any member of the public has the ability to submit a formal complaint, StanCOG staff has created a Title VI Complaint Form, which can be found on StanCOG’s website (www.stancog.org). This form is provided in both English and Spanish. The 2018 StanCOG Title VI report was approved by the StanCOG Policy Board on April 18, 2018 and the report can be viewed on the StanCOG website using the following link http://www.stancog.org/pdf/draft-titlevi-compliance-report.pdf.
1. We are focused on ambitious and achievable VMT reductions. The intent of SB 375 is to improve transportation options and shift land use patterns so that people don’t need to drive long distances every time they want to go somewhere. Vehicle miles traveled (VMT) is a measure of how much people have to drive. VMT is also a common proxy for transportation emissions—the more people drive, the more GHG emissions there are.

Investment Plan

- Improving transit and active transportation infrastructure will help reduce VMT and provide residents with other options of getting where they need to go, without driving long distances. We appreciate the progress made to plan for more for more sustainable transportation systems than both the 2011 and 2014 RTP/SCS plans. Specifically, the 2018 RTP/SCS increased the share of funds going to transit from 33% in 2014 to 39% for a total of $2.8 billion and decreased the share going to new highway capacity.
- However, we are concerned that there was no increase in the share of funding for active transportation, and although the share for roadway decreased, the 2018 draft plan still invests $1.1 billion in roadways. Active transportation can play a key role in improving public health and connecting residents to transit.
  - We recommend StanCOG increase funding for active transportation from $340 to $425 million. In addition, we recommend StanCOG reduce, rather than increase, the total spending on roads which only encourages more driving.

VMT Performance Indicators

- That said, we have some major concerns about the plan and how its policies and investment are not expected to result in VMT reduction.
- First of all, the expected VMT per capita and the change in VMT per capita is not provided in the draft 2018 RTP/SCS. StanCOG staff was very responsive and provided the projected VMT, but change in VMT per capita is integral to SB 375 and must be clearly presented in the RTP/SCS.
- Secondly, there are some very concerning issues in the performance indicators.
  - There is only a 1% difference in VMT from new projects between the business as usual scenario and the draft RTP/SCS. In other words, the plan hardly does anything to reduce VMT. The investments and policies in the plan should result in a reduction in VMT.
  - At the same time, there is a 14% difference in GHG emissions per new household between the business as usual scenario and the draft RTP/SCS. In other words, the plan is somehow expected to reduce GHGs. Yet, VMT from new projects is only expected to reduce by 1%. There is a disconnect between change in GHGs and change in VMT. If the GHG reductions are not coming from VMT, what is causing the GHG reductions? StanCOG must clearly explain which investments and which policies are expected to result in the decrease in GHGs.
2. We urge the staff to develop an **Implementation Action Plan** that includes clear, measurable actions towards RTP/SCS goals. An action plan would increase transparency and accountability to residents and officials alike.
   - Although the draft 2018 RTP/SCS includes a chapter entitled “Action Plan,” it’s just the transportation project list. It does not communicate the connection between StanCOG’s investments and policies and the GHG goals, nor does it include a timeline or plan for monitoring implementation.
   - We recommend StanCOG develop an Implementation Action Plan with measurable actions towards RTP/SCS goals, including VMT reduction strategies and investment in existing communities.

3. Generally, it is **difficult to assess progress** with the draft 2018 plan, because the vast majority of performance indicators in the draft 2018 plan are different from the 2014 plan. Therefore, it’s hard to tell whether this plan better serves Stanislaus County and its communities than the last plan.
   - We recommend StanCOG provide several performance indicators common to both the 2014 and 2018 plans to analyze how this plan is improving conditions. Ideally these indicators should carry forward to future RTP/SCS plans as well.

4. We also encourage StanCOG to conduct robust **public outreach** and allow for all community members to engage in this process of allocating public dollars. We look forward to working with staff on improving the public outreach process. For example, only the Executive Summary was provided in Spanish.
   - We recommend StanCOG provide the full RTP/SCS in Spanish so that community members can read the plan.
Letter 6

COMMENTER: Ella Wise, State Policy Associate, ClimatePlan

DATE: June 20, 2018

RESPONSE:

Response 6.1

The commenter states that the intent of Senate Bill (SB) 375 is to reduce vehicle miles traveled (VMT) by improving transportation options and shifting land use patterns. The commenter also suggests that as VMT increases, greenhouse gas emissions (GHG) also increase. The commenter stated that ClimatePlan is focused on VMT reductions as a common proxy for transportation emissions.

Comment noted.

Response 6.2

The commenter states that the 2018 RTP/SCS should reduce total funding for roadway projects and increase the funding for active transportation projects by 85 million dollars in order to help reduce VMT in the region.

Comment noted.

Response 6.3

The commenter states that the 2018 RTP/SCS does not provide the change in VMT per capita that would result from implementation of the 2018 RTP/SCS. The commenter states that VMT per capita is integral to SB 375 and that change in VMT per capita must be clearly presented in the 2018 RTP/SCS.

This comment pertains to the 2018 Final EIR. Please note that responses to comments pertaining to the 2018 Final EIR are included as responses to comments within the Final Environmental Impact Report and available at StanCOG’s office, located at 1111 I Street, Suite 308, Modesto, California, 95354.

Response 6.4

The commenter states that when compared to the business-as-usual scenario, the 2018 RTP/SCS would result in a 1 percent reduction of VMT. The commenter states that the 2018 RTP/SCS should further reduce VMT compared to the business-as-usual scenario. In addition, the commenter noted that there is a 14% difference in greenhouse gas (GHG) emission reduction per household between the BAU scenario and the draft 2018 RTP/SCS scenario.

There is not necessarily a correlation between VMT and GHG emissions in a one to one ratio. In order to calculate GHG emission reduction percentages from VMT, the total figure would have be split into different speed bins to capture the intensity of congested VMT within the region. Vehicles that are stuck in traffic and traveling at slow stop and go speeds emit much higher GHG emissions than those travelling at free flow speed. Looking specifically at VMT traveling on congested links, the congested VMT under the draft 2018 RTP/SCS is reduced by over 30% when compared to business as usual congested VMT.
Response 6.5

The commenter asks for more explanation regarding why GHG emissions would decrease by 14 percent under the 2018 RTP/SCS, while when compared to the business-as-usual scenario, VMT would decrease by only 1 percent. The commenter also states that StanCOG must clearly explain which 2018 RTP/SCS projects and policies are expected to result in decreased GHG emissions.

California Air Resources Board’s EMFAC 2014 model was used to estimate CO2 emissions under the 2018 RTP/SCS from mobile sources. EMFAC 2014 model has built-in vehicle emission factors for different vehicle fleet types, and can adjust emissions based on vehicle speed, delay times, average trip lengths, time of day, and total travel times. The EMFAC 2014 model also accounts for emissions reductions from State programs and policies, such as Pavley I (Clean Car Standards) and LCFS (Low Carbon Fuel Standards), as well as per-capita VMT reductions. Therefore, because EMFAC 2014 accounts for multiple other factors that affect mobile source GHG emissions in addition to VMT, the percent decrease of GHG emissions under the 2018 RTP/SCS exceeds the percent decrease of VMT. Please refer to response 6.4.

Response 6.6

The commenter would like StanCOG to develop an Implementation Action Plan to include clear, measurable actions towards RTP/SCS goals along with a timeline or plan for monitoring implementation including VMT reduction strategies and investment in existing communities.

Comment noted.

Response 6.7

The commenter states that it is difficult to compare the effectiveness of the 2018 RTP/SCS to the current 2014 RTP/SCS, because the majority of performance indicators used in the 2018 RTP/SCS are different than those in the current 2014 RTP/SCS. The commenter recommends that several performance indicators from the 2014 RTP/SCS be used in the 2018 RTP/SCS, as well as future RTP/SCS updates.

Please refer to response 4.12.

Response 6.8

The commenter noted that only the executive summary was provided in Spanish and recommends that StanCOG provide the full RTP/SCS in Spanish so that community members can read the plan. The commenter also noted that a more robust public outreach is needed to allow for all community members to engage in the RTP/SCS process.

Comments noted.
Elisabeth Hahn - Follow-up on VMT analysis

From: Ella Wise <ella@climateplanca.org>
To: Elisabeth Hahn <ehahn@stancog.org>
Date: 6/21/2018 1:15 PM
Subject: Follow-up on VMT analysis
Cc: Christopher Escárcega <christopher@climateplanca.org>, Chanell Fletcher ...
Attachments: RTPSCS Analysis for StanCOG staff_6.21.2018.xlsx

Hi Elisabeth,

It was great to meet you last night. Thank you for being so receptive to our comments.

In follow-up, I've attached our analysis comparing the performance indicators from the business as usual scenario to the preferred scenario from the draft 2018 RTP/SCS. I've highlighted in yellow the numbers that we referenced in the comments we sent yesterday.

Please let me know if you have any questions. As you've said, it would be helpful to talk through these concerns and hear your thoughts. As I mentioned yesterday, Christopher is healing from an injury, but he is usually the point person for ClimatePlan and I've copied him on this email.

Thank you,
Ella

--
Ella Wise
State Policy Associate, ClimatePlan

845-532-7961 (mobile, preferred)
510-740-9320 (office)
ClimatePlan.org | Facebook | Twitter
<table>
<thead>
<tr>
<th>Performance Indicators</th>
<th>Adopted 2014 RTP/SCS</th>
<th>Draft 2018 RTP/SCS</th>
<th>Difference between 2014 and 2018 RTP/SCS</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Goal 1. Mobility and Accessibility</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>New project trip generation</td>
<td>811,334</td>
<td>806,897</td>
<td>-0.55%</td>
</tr>
<tr>
<td>New project Vehicle Miles Traveled VMT</td>
<td>2,318,267</td>
<td>2,295,111</td>
<td>-1.00%</td>
</tr>
<tr>
<td>% of new households within 0.5 miles of a transit stop</td>
<td>25.2%</td>
<td>32.4%</td>
<td>28.57%</td>
</tr>
<tr>
<td>% of new EJ households (income/race combined) within 0.5 miles of a transit stop</td>
<td>9.9%</td>
<td>15.2%</td>
<td>53.54%</td>
</tr>
<tr>
<td>% of new EJ households (income-based only) within 0.5 miles of a transit stop</td>
<td>4.1%</td>
<td>8.6%</td>
<td>109.76%</td>
</tr>
<tr>
<td>% of new EJ households (race-based only) within 0.5 miles of a transit stop</td>
<td>8.6%</td>
<td>11.9%</td>
<td>38.37%</td>
</tr>
<tr>
<td>VMT growth by scenario (2015-2035)</td>
<td>2,274,286</td>
<td>2,223,627</td>
<td>-2.33%</td>
</tr>
<tr>
<td>Total VMT</td>
<td>14,178,336</td>
<td>14,161,481</td>
<td>-0.12%</td>
</tr>
<tr>
<td>Average trip length of vehicle trips</td>
<td>13.72</td>
<td>13.78</td>
<td>0.44%</td>
</tr>
<tr>
<td>Average trip length of commuter vehicle trips</td>
<td>17.71</td>
<td>17.41</td>
<td>-1.69%</td>
</tr>
<tr>
<td>Drive alone mode share %</td>
<td>34.9%</td>
<td>34.6%</td>
<td>-0.86%</td>
</tr>
<tr>
<td>Ped/bike daily mode share %</td>
<td>7.8%</td>
<td>7.7%</td>
<td>-0.33%</td>
</tr>
<tr>
<td><strong>Goal 2. Social Equity</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Housing mix by type for new development</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Multifamily/townhome</td>
<td>50%</td>
<td>44%</td>
<td>62%</td>
</tr>
<tr>
<td>- Small lot single family</td>
<td>37%</td>
<td>39%</td>
<td>30%</td>
</tr>
<tr>
<td>- Large lot single family</td>
<td>13%</td>
<td>17%</td>
<td>8%</td>
</tr>
<tr>
<td>Average household income required to afford new single-family home</td>
<td>$80,813</td>
<td>$77,721</td>
<td>-4%</td>
</tr>
<tr>
<td>Average household income required to afford new multi-family home</td>
<td>$51,789</td>
<td>$46,659</td>
<td>-10%</td>
</tr>
<tr>
<td>Total households</td>
<td>217,477</td>
<td>217,469</td>
<td>0%</td>
</tr>
<tr>
<td>- EJ Representation</td>
<td>46.10%</td>
<td>47.40%</td>
<td>1%</td>
</tr>
<tr>
<td>Total households within 0.5 of transit</td>
<td>125,823</td>
<td>128,961</td>
<td>2%</td>
</tr>
<tr>
<td>- EJ Representation</td>
<td>64.0%</td>
<td>64.8%</td>
<td>1%</td>
</tr>
<tr>
<td>- EJ Representation</td>
<td>45.60%</td>
<td>52.10%</td>
<td>14%</td>
</tr>
<tr>
<td><strong>Goal 3. Economic and Community Vitality</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Housing mix by type for new development</td>
<td>See Goal 2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Overall residential density of new development</td>
<td>11.4</td>
<td>12.0</td>
<td>15.9</td>
</tr>
<tr>
<td><strong>Goal 4. Sustainable Development Pattern</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total acres of new development</td>
<td>11,920</td>
<td>9,312</td>
<td>7,540</td>
</tr>
<tr>
<td>Acres of farmland converted</td>
<td>8,590</td>
<td>6,000</td>
<td>-29%</td>
</tr>
<tr>
<td>Overall residential density of new development</td>
<td>See Goal 3</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Goal 5. Environmental Quality</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>CO2 emissions per households of new development (tons/year)</td>
<td>6.6</td>
<td>5.7</td>
<td>-14%</td>
</tr>
<tr>
<td>GHG reduction target compliance (5% per capita by 2020 and 10% by 2030)</td>
<td>yes</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Goal 6. Health and Safety</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>% of new households within 0.5 miles of a transit stop</td>
<td>15.6%</td>
<td>20.8%</td>
<td>33%</td>
</tr>
<tr>
<td>% of new low-income EJ households within 0.5 miles of a transit stop</td>
<td>5.9%</td>
<td>10.4%</td>
<td>76%</td>
</tr>
<tr>
<td>EJ households as a % of total households within 500-feet of a major roadway</td>
<td>58.1%</td>
<td>59.0%</td>
<td>2%</td>
</tr>
<tr>
<td>Meets Federal health-based emission budgets</td>
<td>Yes</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td><strong>Goal 7. System Preservation</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>iota new local roadway lane miles resulting from new development (lane miles)</td>
<td>530</td>
<td>428</td>
<td>-19%</td>
</tr>
<tr>
<td><strong>Goal 8. Smart Infrastructure</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>TBD</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Goal 9. Reliability and Congestion</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Congested lane miles</td>
<td>1,619,597</td>
<td>2,341,366</td>
<td>45%</td>
</tr>
<tr>
<td>CMT roadway network level of service</td>
<td>n/a</td>
<td>n/a</td>
<td></td>
</tr>
<tr>
<td>Level of congestion for monitoring baselines conditions only</td>
<td>n/a</td>
<td>n/a</td>
<td></td>
</tr>
<tr>
<td>Level of Travel Time Reliability for monitoring baseline conditions only.</td>
<td>n/a</td>
<td>n/a</td>
<td></td>
</tr>
<tr>
<td><strong>Goal 10. Project Delivery</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>TBD</td>
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<td></td>
<td></td>
</tr>
</tbody>
</table>
Letter 7

COMMENTER:   Ella Wise, State Policy Associate, ClimatePlan

DATE:        June 21, 2018

RESPONSE:

Response 7.1

This comment letter was submitted on June 21, 2018, one day after comment letter 6, was submitted. This comment letter was intended to be a follow up and provide supporting information to comment letter 6.

The commenter provided a spreadsheet analysis comparing performance indicators of the 2018 RTP/SCS to the business-as-usual scenario in 2035. The analysis emphasizes a 1 percent decrease in new VMT and a 14 percent decrease in GHG emissions in 2035.

This comment contains no new comment to the comments previously submitted and responded to in Response to Comment #6 and was received and is noted as a follow up to comment letter 6. Please refer to responses 6.4 and 6.5.
June 25, 2018

Ms. Elisabeth Hahn  
Principal Planner  
Stanislaus Council of Governments  
1111 I Street, Suite 308  
Modesto, CA 95354

Dear Ms. Hahn:

The California Department of Transportation appreciates the opportunity to have reviewed the Draft 2018 RTP/SCS and Draft EIR. The Department has the following comments.

- **StanCOG is commended for:**
  - Developing a 2018 Regional Transportation Plan that is very clear, interesting to read, well supported with a documented public involvement process, and rich with graphics and illustrations;
  - Preparing extensive consideration in the Technical Appendices;
  - Executing a robust public participation plan with many nodes of access for input throughout the development of the plan.
  - A comprehensive and thorough discussion of multi-modal goods movement issues, projects, and related recent goods movement studies in Appendix V.
  - Strong alignment between the RTP and the California Transportation Plan 2040 (CTP 2040) goals and objectives.

- **General:**
  - The RTP Checklist should reference RTP content locations in the body of the RTP and give the appropriate page number locations, not just Chapter or Appendix references.
  - Caltrans recommends including a brief discussion of Scenario 2, its merits and results, in the executive summary.

- **RTP Checklist, Consultation/Cooperation section**
  - Appendix C is missing and does not provide the necessary content for many of the Checklist questions.
  - #2. Appendix B is missing and does not provide the necessary content for the Checklist question.

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California’s economy and livability"
• **RTP Checklist, Financial section #2.** Please include a statement ensuring that the first four years of the fund estimate is consistent with the 4-year STIP fund estimate.

Please contact Nicholas Fung at (209) 948-7190 or by e-mail sent to nicholas.fung@dot.ca.gov or myself at (209) 941-1921 or by email sent to tom.dumas@dot.ca.gov if you have any further questions. We look forward to continuing to work with you in a cooperative manner.

Sincerely,

TOM DUMAS, CHIEF
Office of Metropolitan Planning

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"
Letter 8

COMMENTER:  Tom Dumas, California Department of Transportation

DATE:    June 25, 2018

RESPONSE:

Response 8.1

Commenter commends StanCOG for developing a very clear plan and documented public involvement process, extensive appendices, robust public participation, comprehensive multi-modal goods movement studies, and strong alignment between the plan and the California Transportation 2040 goals and objectives.

Comment noted.

Response 8.2

Commenter stated that the RTP Checklist provided in Appendix E should reference content locations in the body of the RTP and give appropriate page number locations instead of just a Chapter or appendix reference.

Page numbers will be in the RTP Checklist. The checklist will be updated to provide the appropriate page numbers and locations.

Response 8.3

Commenter recommends including a description of Scenario 2 in the executive summary.

A description of the preferred scenario will be added to the executive summary.

Response 8.4

Commenter stated that Appendix B and Appendix C are missing and do not provide content for the RTP Checklist questions.

Appendices B (Responses to Comments) and C (Public Notices) will be included in the final 2018 RTP/SCS.

Response 8.5

Commenter suggests StanCOG add a statement ensuring that the first four years of the fund estimate is consistent with the 4-year STIP fund estimate.

The STIP fund estimate was checked and revised and a statement will be added to Chapter 5.
There is an imbalance of priorities in the Draft 2018 Regional Transportation Plan/Sustainable Community Strategy (2018 RTP/SCS) and related Draft EIR. Given that the intent is to better serve the residents of Stanislaus County as the StanCOG Board has expressed, then the 2018 RTP/SCS as currently drafted is not hitting all intended targets. It is also recognized that as individual projects reach implementation, detailed reports addressing project particulars will be generated surpassing these current programmatic documents. In the meantime, it is best to identify Plan shortcomings before generating final project specifics. Therefore, the following comments are submitted for review.

1. Improved focus on infrastructure repair

The transportation infrastructure of Stanislaus County is largely in deplorable condition and the proposed plan does not adequately address the problem. Taxpayers passed Measure “L” since they were primarily concerned about the atrocious condition of existing infrastructure and the damaging impact it is having upon their vehicles. However, the RTP/SCS is overly focused on the development of new and expanded roadway additions with a minor portion of funds being directed to improving existing infrastructure. It is critical to develop a plan to fully address dangerous existing infrastructure, including bridges, before committing funds toward new roadways. It is acknowledged in the report that the condition of county roads rate lower than those of the county’s towns. However, there is a shortage of Plan direction to correct that issue. At a minimum, funds must be reallocated to bring parity of the condition of county roads to that of the cities.

Similarly, many of the roadways were not originally designed for handling the modern traffic demands which have evolved. This has exacerbated the roadway maintenance repair problem. As an example, there are county roadways which are exceptionally narrow such that the many big rigs which travel them daily crowd and frequently cross over the dividing line in order to minimize their travel on the edge of the roadways. In an effort to minimize their vehicle miles traveled, they use the most expeditious routes, allowing pavement damage to regularly occur as a result of oversized vehicles using undersized roadways, faster than Public Works is able to make the necessary patchwork repairs.
encountering these large behemoths, a passenger vehicle must frequently hit the road shoulder where there frequently is existing roadway damage such as sections of missing pavement which can easily cause a tire failure and potential loss of vehicle control. It literally is a life-threatening situation and yet the Plan does little to resolve the ongoing endangerment of these situations. The main focus is excessively on new development to spend the expected close to one Billion dollars created from the passing of Measure “L.” There needs to be a higher ratio of funding directed to restoring existing infrastructure with a crisply defined control designation of routes of where DOT Class 7 and above rated heavy vehicles are allowed to travel on roadways and bridges designed for their size and weight.

2. Retaining Faith Home Road

There is mention of the Plan’s focus to be sensitive to minimize the loss of agriculture lands plus extensive mitigation measures for wildlife and potential fossil findings. However, there is no stated regard fully expressing the damage from projects disrupting the families and businesses impacted from the Plan’s objectives. The approach to widen Faith Home Road into Expressway status after the bridge over the Tuolumne River is completed is inadequate. While some “Prime Farmland” acreage would be lost if this roadway widening was implemented, the report needs to also address the impact of approximately 60 families plus additional businesses which would be displaced by this project. The EIR commitment to recontour lands taken to provide a “smooth and gradual transition” is problematic when addressing such an extensive impact to the point it is viewed unachievable. Replacing lost trees on the committed 2:1 ratio is unlikely considering the impact of losing established orchards paralleling the roadway. Providing the impacted families of critical lost “Important Farmland” in the committed compensatory ratio of 1:1 does not necessarily replace critical acreage for the impacted land owner in a useable location. In order to avoid these commitments being more than just vague statements in the future, more detailed specificity is required to adequately communicate the proposed impacts. Simply classifying the impacts, including the degradation to the existing visual character of the area as being “significant and unavoidable,” lacks the
necessary empirical analysis for a full EIR assessment and will clearly impact the affected families from the enjoyment of their properties.

The expressway development of Faith Home Road can’t be supported without a more comprehensive assessment of how all County traffic is expected to migrate. Analysis of roadways such as Santa Fe, the planned north County Expressway, and other planned network connections all need to be more fully completed to understand their ability to serve access to the Modesto area. It is understood that the Plan desires to reduce vehicle miles traveled (VMT) in order to help achieve air quality targets. However, given that there is little to any improvement toward reducing the VMT under the Plan, it remains ill-conceived to alter Faith Home Road into an expressway and disrupt so many citizens. The StanCOG Board recognizes that there is an expected unknown shift of travel preferences and resulting traffic patterns through multiple means such as growing Uber and Lyft usage, County mass transit ridership changes to successfully achieve required farebox recovery ratios, and ACE train service into Stanislaus County affecting commute activity. Clearly there needs to be revised traffic pattern analysis with verifiable modeling performed that encompasses these parameters.

Additionally, there is no impact addressing a Faith Home Road expansion which would create unnecessary increased complexity of operations, maintenance and the repairs of the planned Surface Water Supply Project as driven by the Stanislaus Regional Water Authority. That critical water system is scheduled to be installed in the middle of Faith Home Road.

3. Fink Road Upgrade

The Plan of new roads does not consistently address how traffic prefers to move in some cases. For example, the Crows Landing Road improvement appears to stop at Highway 33 whereas, traffic traveling south out of the area typically continues onward via Fink Road to reach Interstate 5. There is a proposed improvement at the Interstate 5 and the Fink Road connection. The section of Fink Road, between Crows Landing Road and Interstate 5 requires similar attention as Crows Landing Road is scheduled to receive.
4. West Main to Interstate 5

West Main from Turlock to Patterson continues to be impacted due to commute traffic to Patterson’s industrial parks. A better approach to alleviate this issue must be clearly defined. Relatedly, there is a road marked on the map which is north of and in parallel to West Main on which no name can be identified. Is this a new road to be created while also spending funds to improve West Main or is it an improved extension of Monte Vista making the roadway continuous to Interstate 5 from Turlock? The document is not sufficiently clear to distinguish what is intended to be developed.

5. Planned Bus Replacements

The Plan identifies a purchased of a number of new diesel-powered buses. This approach appears counterproductive given that an objective is to improve the air quality attainment record. It would be more genuine to purchase clean air buses which would be compressed natural gas (CNG) powered. In addition to less pollutants being generated by CNG buses, there is less refining required to provide a usable fuel.

6. Tiering of Environmental Impact Assessments

It is understood that the ability to tier EIR assessments can be a valuable tool toward reducing the costs of establishing development plans and further leveraging tax monies. A concern remains that any tiering of EIR documents need to be structured such that all quantifiable metrics of impacts can be easily bridged between EIR reports. While StanCOG staff may be aware of the network of any tiered assessments, the empirical information needs to be thoroughly referenced and identified for citizens to easily link all related tiered EIR reports for ease of fully understanding report content.

Ray Dias  P.E.
Letter 9

COMMENTER: Ray Dias, P.E.

DATE: June 25, 2018

RESPONSE:

Response 9.1

The commenter states that there is an imbalance of priorities in the 2018 RTP/SCS and Draft EIR.

Comment noted.

Response 9.2

The commenter states that the 2018 RTP/SCS as currently drafted is not hitting all intended targets.

Comment noted.

Response 9.3

The commenter states that detailed reports would be prepared for individual projects as they are developed.

Comment noted.

Response 9.4

The commenter states that the 2018 RTP/SCS is overly focused on the development of new and expanded roadway additions, and only allocates minor funding toward improving existing infrastructure. The commenter also describes traffic conflicts between passenger vehicles and tractor trailers on existing roadways in Stanislaus County. The commenter states that the 2018 RTP/SCS needs to focus more funding toward restoring existing transportation infrastructure and identifying routes for tractor trailers.

Comment noted.

Response 9.5

The commenter states that the Final EIR describes the 2018 RTP/SCS as minimizing the loss of agricultural lands and provides mitigation measures for wildlife and paleontological resources, but does not fully address the disruption of families and businesses impacted by projects included in the 2018 RTP/SCS.

This comment pertains to the 2018 Final EIR. Please note that responses to comments pertaining to the 2018 Final EIR are included as responses to comments within the Final Environmental Impact Report and available at StanCOG’s office, located at 1111 I Street, Suite 308, Modesto, California, 95354.
Response 9.6

The commenter states that the Draft EIR should address the families and businesses that would be displaced by the Faith Home Road project due to unavoidable impacts to Prime Farmland that these families and businesses either own or depend upon. The commenter states that the Draft EIR analysis is too vague for the mitigation measures provided in the aesthetics section and agricultural section of the Draft EIR to effectively mitigate impacts specific to the families and business that would be impacted by the Faith Home Road project. The commenter states that the EIR requires more detailed specificity regarding the impacts to these families from the Faith Home Road project.

This comment pertains to the 2018 Final EIR. Please note that responses to comments pertaining to the 2018 Final EIR are included as responses to comments within the Final Environmental Impact Report and available at StanCOG’s office, located at 1111 I Street, Suite 308, Modesto, California, 95354.

Response 9.7

The commenter states that a more comprehensive assessment of how traffic patterns would change is required for the Faith Home Road project. The commenter states that the assessment should utilize verifiable modeling that encompasses ride-share services, mass transit, and Altamont Corridor Express (ACE) train service.

The RTP/SCS is a programmatic level document that contains a regional assessment of projects proposed. An individual project (such as the Faith Home Road project) would have its own project level analysis done with a separate environmental analysis as appropriate, travel demand modeling analysis, and traffic analysis.

Response 9.8

The commenter states that the Draft EIR does not evaluate the potential for the Faith Home Road project to result in increased complexity of operation, maintenance and repair of the Surface Water Supply Project.

This comment pertains to the 2018 Final EIR. Please note that responses to comments pertaining to the 2018 Final EIR are included as responses to comments within the Final Environmental Impact Report and available at StanCOG’s office, located at 1111 I Street, Suite 308, Modesto, California, 95354.

Response 9.9

The commenter states that the 2018 RTP/SCS does not accurately portray traffic patterns on particular roadway segments, such as traffic patterns on Fink Road between Crows Landing Road and Interstate 5.

Please refer to response 9.7.

Response 9.10

The commenter states that the 2018 RTP/SCS must include a better solution to alleviating commuter traffic on West Main Street, between Turlock and Patterson.

Comment noted.
Response 9.11

The commenter states that the 2018 RTP/SCS is unclear on what type of improvements are proposed with regards to West Main Street.

The project shown on the map was an early alternative generated from the public outreach process conducted by the South County Corridor Feasibility Study. The objective of the South County Corridor is to create a new east-west four lane divided expressway that would provide a more efficient and direct travel route between State Route 99, State Route 33, and Interstate 5 in the southern part of Stanislaus County. The feasibility study can be found on the StanCOG website via http://www.stancog.org/pdf/final-south-county-corridor-feasibility-study.pdf.

Response 9.12

The commenter states that the 2018 RTP/SCS includes purchase of new diesel-powered buses. The commenter states that diesel-powered buses appear to be counterproductive to improving air quality attainment. The commenter states that buses powered with compressed natural gas should be purchased instead of diesel-powered buses, because fewer pollutants would be regenerated and less oil refining would be required.

Comment noted.

Response 9.13

The commenter states that future CEQA documents tiered from the Draft EIR need to be structured such that quantifiable metrics of impacts can be easily bridged between those CEQA documents and the Draft EIR. Additionally, the commenter states that empirical information needs to be thoroughly referenced and identified in order to easily link all related tiered CEQA reports to the Draft EIR.

This comment pertains to the 2018 Final EIR. Please note that responses to comments pertaining to the 2018 Final EIR are included as responses to comments within the Final Environmental Impact Report and available at StanCOG’s office, located at 1111 I Street, Suite 308, Modesto, California, 95354.
To StanCog:

With the written permission and encouragement of Ray Dias, attached please find his recent articulate and well-researched contribution to the Draft 2018 Regional Transportation Plan etc. Lacking his skills of analysis but recognizing the excellence of his presentation, and caring deeply about the future of east of Ceres, we Michael D. Cousins and Patricia M. Cousins

3865 Roeding Road, Ceres, CA 95307 209-538-2875, re-submit his opinions and conclusions and add a few of our own. Please confirm receipt of this document.

1. Improved focus on infrastructure repair

   The rebuilding and effective maintaining of existing roadways should take necessary priority over paving over yet more dirt. The fill-the-pothole maintenance mentality that seems often to prevail often results in holes reappearing three to four weeks after last patching. New roads and new bridges are not necessarily a roadway solution. Replacement in kind may be.

2. Retaining Faith Home Road

   Leave Faith Home Road as a country byway. Do not build a bridge for it over the Tuolumne River. The approximately four square miles bounded by the Tuolumne River to the north, Faith Home Road to the east, Hwy 99 to the south, and Mitchell Road to the west are in the cross-hairs of any plan that seeks to destroy Faith Home as a country road and replace it with some behemoth variety of expressway/corridor/freeway/through way. Quoting Mr. Dias: "However there is no stated regard fully expressing the damage from projects disrupting the families and businesses impacted from the Plan's objectives." Perhaps one of the four square miles houses residents and the Mitchell Corridor includes a strip of businesses. However the roughly remaining three square miles is farmland, schools, and sports fields. To recreate Faith Home Road as a "better than Mitchell" freeway equates with the unnecessary, unwanted and unwarranted destruction of rural life in the misguided allegiance to more (blacktop) being better blacktop for the four square miles involved. The impact as foreseen by planners is said to be "significant and unavoidable." Significant yes, so avoidable also yes. To, again, echo Mr. Dias "Clearly there needs to be revised traffic pattern analysis with verifiable modeling performed that encompasses these parameters."

   The roads have an updated bridge on Santa Fe and one being planned for Seventh Street. ACE will focus Ceres on the west side of town. Model the impact of these bridges. Look to the west. Try leaving Faith Home out of the presently proposed imbalanced equation.

3. Fink Road Upgrade

   I join in the request of Mr. Dias for additional information.

4. West Main to Interstate 5

   Improve safety of West Main rather than replacing it with another corridor.

5. Planned Bus Replacements

   Are electric buses being considered as an option?

6. Tiering of Environmental Impact Assessments

   Please focus on presentations with ease of fully understanding report content.

In summary, who does not prefer the smells, sound, sighting, and lives of bees and birds to the smells, sounds, and sighting of trucks and other traffic? Please think of the trade off, balance the equation.

Thank you Michael D. Cousins and Patricia Melugin Cousins

3865 Roeding Rd. Ceres, CA 94307

209-538-2875
Letter 10

COMMENTER: Patricia and Michael Cousins

DATE: June 30, 2018

RESPONSE:

Response 10.1

The commenter states that they are resubmitting comments that were submitted by Mr. Ray Dias, with additional information.

Both the commenter’s letter and the comment letter submitted by Mr. Ray Dias were received by StanCOG. The comment letter submitted by Ray Dias is comment letter 9 in this document.

Response 10.2

The commenter states that maintenance of existing roadways should take priority over new roadways and transportation infrastructure.

Comment noted.

Response 10.3

The commenter states that the Draft EIR should address the families and businesses that would be displaced by the Faith Home Road project, either by removal of homes and places of business, or from removal of farmland and fields.

This comment pertains to the 2018 Final EIR. Please note that responses to comments pertaining to the 2018 Final EIR are included as responses to comments within the Final Environmental Impact Report and available at StanCOG’s office, located at 1111 I Street, Suite 308, Modesto, California, 95354.

Response 10.4

The commenter states that the 2018 RTP/SCS includes an updated bridge project on Santa Fe and a planned bridge project on Seventh Street in Ceres. The commenter also states that ACE will focus on the west side of Ceres. The commenter states that the impacts of these projects should be modeled, and that the Faith Home Road project should be avoided.

The draft 2018 RTP/SCS presents a programmatic level document that focuses on an entire program of projects. Individual transportation projects would be addressed as required in more detailed project level analyses.

Response 10.5

The commenter states that like Mr. Dias, they too would like more information regarding the Fink Road Upgrade project.

Comment noted.
Response 10.6

The commenter states that safety on West Main Street should be improved rather than replacing it with another corridor.

Comment noted.

Response 10.7

The commenter asks if electric buses are considered as an option.

The 2018 RTP/SCS includes projects that would replace diesel buses with electric buses. For example, Project ID: M71 in the 2018 RTP/SCS calls for replacing four diesel buses in the Modesto Area Express (MAX) fleet with four electric buses. Another example is Project ID: T51, which calls for the acquisition of zero-emission buses. Zero-emission buses operate using electricity instead of gasoline, diesel, or natural gas.

Response 10.8

The commenter states that future CEQA documents tiered from the Draft EIR need to be structured such that they are easily understood.

This comment pertains to the 2018 Final EIR. Please note that responses to comments pertaining to the 2018 Final EIR are included as responses to comments within the Final Environmental Impact Report and available at StanCOG’s office, located at 1111 I Street, Suite 308, Modesto, California, 95354.

Response 10.9

The commenter suggests that the smell, sounds, sights, and lives of insects and birds are preferred to the smells, sounds, and sights of traffic, and asks that StanCOG achieve a balance between the two.

This comment pertains to the 2018 Final EIR. Please note that responses to comments pertaining to the 2018 Final EIR are included as responses to comments within the Final Environmental Impact Report and available at StanCOG’s office, located at 1111 I Street, Suite 308, Modesto, California, 95354.
As a co-owner of property located at 3831 Roeding Avenue, Ceres, CA 95307, I would like to provide my support for the efforts to improve the Draft 2018 Regional Transportation Plan/Sustainable Community Strategy (2018 RTP/SCS) and related Draft EIR.

With permission from both Mr. Ray Dias and the Dr./Mrs. Michael Cousins, I am providing their testimony again since it is in agreement with my own. After spending considerable time with the documents, I am struck repeatedly with how accurately Mr. Dias has described the imbalances in the document between maintaining and improving transportation routes and that of creating new roadways which would seem destined to fall also into disrepair with time. Mr. Dias’ is very accurate in describing the difficult and dangerous rural roads in Stanislaus Co. where competition between trucks and cars is on-going.

In reviewing the priorities for the County and especially the importance of agriculture to its economy, I do believe that more emphasis needs to be placed on protecting prime farmland from unnecessary development and that includes minimizing the development of roadways which will disrupt agriculture and associated rural family life. Very specifically, I do not support the development of a Faith Home Expressway nor a new bridge over the River as an entry point into east Modesto. Leaving Faith Home Road as a road and providing safety improvements is definitely in order; the creation of an Expressway would destroy the agricultural lands and families along that route and would create a very different environment for development in east Ceres.

I call attention to the Executive Summary of the plan which speaks to areas of particular concern to me. As indicated by Mr. Dias, there seems to be far more emphasis on “new” roads than on fixing those currently in dire need of repair. If the County is serious about Goal 4 and 7, and in minimizing impact on Agriculture, I suggest further consideration of the projects as laid out in the DRAFT document.

“GOAL 4: Sustainable Development Pattern
Provide a mix of land uses and compact development patterns; and direct development toward existing infrastructure, which will preserve agricultural land, open space, and natural resources.”

“GOAL 7: System Preservation
Maintain the transportation system in a state of good repair, and protect the region’s transportation investments by maximizing the use of existing facilities.”

“Agriculture Impact
AG-1. The proposed transportation improvements and land use scenario envisioned by the 2018 RTP/SCS could result in the conversion of Important Farmland to non-agricultural uses, or conflict with existing zoning for agriculture or a Williamson Act Contract. This would be a significant and unavoidable impact.”

I am in full agreement with the testimony as provided below:
Testimony submitted by Ray Dias, P.E. on June 25, 2018

“There is an imbalance of priorities in the Draft 2018 Regional Transportation Plan/Sustainable Community Strategy (2018 RTP/SCS) and related Draft EIR. Given that the intent is to better serve the residents of Stanislaus County as the StanCOG Board has expressed, then the 2018 RTP/SCS as currently drafted is not hitting all intended targets. It is also recognized that as individual projects reach implementation, detailed reports addressing project particulars will be generated surpassing these current programmatic documents. In the meantime, it is best to identify Plan shortcomings before generating final project specifics. Therefore, the following comments are submitted for review.

1. Improved focus on infrastructure repair

The transportation infrastructure of Stanislaus County is largely in deplorable condition and the proposed plan does not adequately address the problem. Taxpayers passed Measure “L” since they were primarily concerned about the atrocious condition of existing infrastructure and the damaging impact it is having upon their vehicles. However, the RTP/SCS is overly focused on the development of new and expanded roadway additions with a minor portion of funds being directed to improving existing infrastructure. It is critical to develop a plan to fully address dangerous existing infrastructure, including bridges, before committing funds toward new roadways. It is acknowledged in the report that the condition of county roads rate lower than those of the county’s towns. However, there is a shortage of Plan direction to correct that issue. At a minimum, funds must be reallocated to bring parity of the condition of county roads to that of the cities.

Similarly, many of the roadways were not originally designed for handling the modern traffic demands which have evolved. This has exacerbated the roadway maintenance repair problem. As an example, there are county roadways which are exceptionally narrow such that the many big rigs which travel them daily crowd and frequently cross over the dividing line in order to minimize their travel on the edge of the roadways. In an effort to minimize their vehicle miles traveled, they use the most expeditious routes, allowing pavement damage to regularly occur as a result of oversized vehicles using undersized roadways, faster than Public Works is able to make the necessary patchwork repairs. When encountering these large behemoths, a passenger vehicle must frequently hit the
road shoulder where there frequently is existing roadway damage such as sections of missing pavement which can easily cause a tire failure and potential loss of vehicle control. It literally is a life-threatening situation and yet the Plan does little to resolve the ongoing endangerment of these situations. The main focus is excessively on new development to spend the expected close to one Billion dollars created from the passing of Measure “L.” There needs to be a higher ratio of funding directed to restoring existing infrastructure with a crisply defined control designation of routes of where DOT Class 7 and above rated heavy vehicles are allowed to travel on roadways and bridges designed for their size and weight.

2. Retaining Faith Home Road

There is mention of the Plan’s focus to be sensitive to minimize the loss of agriculture lands plus extensive mitigation measures for wildlife and potential fossil findings. However, there is no stated regard fully expressing the damage from projects disrupting the families and businesses impacted from the Plan’s objectives. The approach to widen Faith Home Road into Expressway status after the bridge over the Tuolumne River is completed is inadequate. While some “Prime Farmland” acreage would be loss if this roadway widening was implemented, the report needs to also address the impact of approximately 60 families plus additional businesses which would be displaced by this project. The EIR commitment to recontour lands taken to provide a “smooth and gradual transition” is problematic when addressing such an extensive impact to the point it is viewed unachievable. Replacing lost trees on the committed 2:1 ratio is unlikely considering the impact of losing established orchards paralleling the roadway. Providing the impacted families of critical lost “Important Farmland” in the committed compensatory ratio of 1:1 does not necessarily replace critical acreage for the impacted land owner in a useable location. In order to avoid these commitments being more than just vague statements in the future, more detailed specificity is required to adequately communicate the proposed impacts. Simply classifying the impacts, including the degradation to the existing visual character of the area as being “significant and unavoidable,” lacks the necessary empirical analysis for a full EIR assessment and will clearly impact the affected families from the enjoyment of their properties.
The expressway development of Faith Home Road can’t be supported without a more comprehensive assessment of how all County traffic is expected to migrate. Analysis of roadways such as Santa Fe, the planned north County Expressway, and other planned network connections all need to be more fully completed to understand their ability to serve access to the Modesto area. It is understood that the Plan desires to reduce vehicle miles traveled (VMT) in order to help achieve air quality targets. However, given that there is little to any improvement toward reducing the VMT under the Plan, it remains ill-conceived to alter Faith Home Road into an expressway and disrupt so many citizens. The StanCOG Board recognizes that there is an expected unknown shift of travel preferences and resulting traffic patterns through multiple means such as growing Uber and Lyft usage, County mass transit ridership changes to successfully achieve required farebox recovery ratios, and ACE train service into Stanislaus County affecting commute activity. Clearly there needs to be revised traffic pattern analysis with verifiable modeling performed that encompasses these parameters.

Additionally, there is no impact addressing a Faith Home Road expansion which would create unnecessary increased complexity of operations, maintenance and the repairs of the planned Surface Water Supply Project as driven by the Stanislaus Regional Water Authority. That critical water system is scheduled to be installed in the middle of Faith Home Road.

3. **Fink Road Upgrade**

The Plan of new roads does not consistently address how traffic prefers to move in some cases. For example, the Crows Landing Road improvement appears to stop at Highway 33 whereas, traffic traveling south out of the area typically continues onward via Fink Road to reach Interstate 5. There is a proposed improvement at the Interstate 5 and the Fink Road connection. The section of Fink Road, between Crows Landing Road and Interstate 5 requires similar attention as Crows Landing Road is scheduled to receive.

4. **West Main to Interstate 5**

West Main from Turlock to Patterson continues to be impacted due to commute traffic to Patterson’s industrial parks. A better approach to alleviate this issue must be clearly defined. Relatedly, there is a road marked on the map which is
north of and in parallel to West Main on which no name can be identified. Is this a new road to be created while also spending funds to improve West Main or is it an improved extension of Monte Vista making the roadway continuous to Interstate 5 from Turlock? The document is not sufficiently clear to distinguish what is intended to be developed.

5. Planned Bus Replacements

The Plan identifies a purchased of a number of new diesel-powered buses. This approach appears counterproductive given that an objective is to improve the air quality attainment record. It would be more genuine to purchase clean air buses which would be compressed natural gas (CNG) powered. In addition to less pollutants being generated by CNG buses, there is less refining required to provide a usable fuel.

6. Tiering of Environmental Impact Assessments

It is understood that the ability to tier EIR assessments can be a valuable tool toward reducing the costs of establishing development plans and further leveraging tax monies. A concern remains that any tiering of EIR documents need to be structured such that all quantifiable metrics of impacts can be easily bridged between EIR reports. While StanCOG staff may be aware of the network of any tiered assessments, the empirical information needs to be thoroughly referenced and identified for citizens to easily link all related tiered EIR reports for ease of fully understanding report content.”

Ray Dias  P.E.
Letter 11

COMMENTER: Stella Oakley

DATE: July 3, 2018

RESPONSE:

Response 11.1

The commenter states that they support improvements to the 2018 RTP/SCS and Draft EIR, and are resubmitting comments submitted by Mr. Ray Dias and Dr. and Mrs. Cousins (See comments and responses to letters 9 and 10). The commenter states that comments submitted by Mr. Ray Dias accurately describe imbalances in the 2018 RTP/SCS between maintaining existing roadways and creating new roadways. The commenter also states that the comments submitted by Mr. Ray Dias accurately capture the dangerous conditions on rural roads between tractor trailers and cars.

Comment noted.

Response 11.2

The commenter states that more emphasis needs to be placed on protecting Prime Farmland. Specifically, the commenter states that they do not support the Faith Home Road project, which would destroy agricultural land and displace families in the area.

This comment pertains to the 2018 Final EIR. Please note that responses to comments pertaining to the 2018 Final EIR are included as responses to comments within the Final Environmental Impact Report and available at StanCOG’s office, located at 1111 I Street, Suite 308, Modesto, California, 95354.

Response 11.3

The commenter states that the 2018 RTP/SCS appears to place more emphasis on creating new roadways than maintaining existing roadways. The commenter states that the County should reconsider this if it is serious about achieving Goal 4 and 7 of the 2018 RTP/SCS and minimizing agricultural impacts. The commenter provides the description of Goal 4 and Goal 7 from the Executive Summary of the 2018 RTP/SCS and restates the summary of Agricultural Impact AG-1 from the Draft EIR.

Comment noted.

Response 11.4

The commenter states that they are in full agreement with the comment letter submitted by Mr. Ray Dias. The commenter provides a copy of the comment letter that was submitted by Mr. Ray Dias.

The comments submitted by Mr. Ray Dias are provided in comment letter 9 in this document.
Dear Ms. De León Park:

On behalf of the undersigned organizations, thank you for this opportunity to comment on the draft 2018 Stanislaus Council of Governments (StanCOG) Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS). We recognize and appreciate the work that StanCOG staff, committees, and board members have invested in this plan. We would also like to thank you for the opportunity to meet with staff throughout the process to share our concerns, questions, and feedback.

Our organizations believe that sustainable land use and transportation planning is essential to achieving positive outcomes for Stanislaus communities, including: cleaner air; improved public health; economic vitality; safe and affordable access to schools, jobs, and services; housing and transportation choices; preservation of working lands and wildlands; and social equity. To that end, we are committed to supporting ambitious and achievable round two implementation of SB 375.

We applaud StanCOG’s commitment to addressing the transportation needs of the communities within StanCOG as well as multimodal connections to neighboring regions. We stand with StanCOG in the belief that a robust and efficient transportation plan is key to economic
prosperity and improved quality of life for residents. After reviewing the draft RTP/SCS and speaking with staff, we believe this plan has the potential to further advance healthy, sustainable, and equitable communities in the region. We are especially supportive of the following:

- **Increased funding for transit in the 2018 draft plan**: This plan commits $2.8 billion towards public transit, which represents 39% of total allocations in the financial plan. This builds significantly on both the 2014 and 2011 financial plans. It will provide residents with more options to travel within the region, as well as to neighboring communities. This improvement will also help to lessen traffic and congestions on the roadways.

- **Decreased share of transportation funding for roadways**: We are pleased to see that this plan decreases the share of funding for roadways. The 2011 plan committed 84% of its funds to roadways, the 2014 plan committed 61% of its funds to roadways, and now the 2018 plan is committing 53% of its funds to roadways. We are excited to see the trend of less investment in roadways, and more investment in public transit.

- **Planning for more multi-family homes and less land conversion**: We’re excited to see that the draft RTP/SCS plans for more multifamily homes, greater residential density, and less land conversion than the 2014 adopted RTP/SCS. These are huge strides in the right direction. Increased density and multifamily homes provide residents with housing options to meet their needs, as well as protects natural and working lands.

- **Expanded public participation**: We commend staff efforts to expand outreach to communities throughout the region, and recognize that real progress has been made since the 2014 RTP/SCS update process. We encourage staff to continue to work with community-based organizations to help reach vulnerable and isolated populations.

- **Prioritizing social equity**: One of the goals of this plan is to “promote equitable access to opportunities by ensuring all populations share in the benefits of transportation improvements and are provided a range of transportation and housing choices.” We commend StanCOG for elevating underrepresented communities and are fully supportive of this ambitious goal to ensure all residents, despite their socioeconomic circumstances, benefit from this plan.

As engaged stakeholders in this process, we would also like to put forward the following recommendations for incorporation into the final plan.

**Ensure clarity and transparency in GHG emissions reductions and VMT projections**

The relationship between vehicle miles traveled (VMT) and greenhouse gas (GHG) emission reductions are growing increasingly complex with the advent of new automotive technologies, the emergence of “Transportation-as-a-Service” (TaaS) ridesharing platforms, and congestion considerations (the push-pull between VMT “rebound” and induced demand). VMT per capita

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has commonly been used as a proxy for GHG emissions per capita. Given the complexity in the relationship between VMT and GHG, we recommend that staff:

1) Present projected aggregate VMT reduction per capita, including calculations from the transportation demand model as well as calculations from off-model strategies, as a performance metric.

2) Explain the variance between the projected GHG per capita reductions and the VMT per capita reduction. What investments and policies (or expected changes to behavior or available technologies) account for the difference between VMT reduction per capita and GHG reduction per capita?

**Increase funding for active transportation**

As noted above, we are fully supportive of the increase in funding for transit and would like to see a similar increase for active transportation. Active transportation plays a key role in improving public health, improving air quality, and connecting residents to transit. There are also state programs, like the Active Transportation Program, where StanCOG can leverage its funds with state funds to build bicycle networks to provide even more transportation options to residents. The plan commits only 5% of its funding to active transportation, which is similar to the 2014 and 2011 plan. If possible, we recommend StanCOG use its flexible funds to increase funding for active transportation.

**Standardize performance targets and develop an implementation action plan**

Since many of the performance indicators from the 2014 plan have changed with the 2018 draft, it has been difficult to track the progress of the region. We recommend that staff work with the board to adopt a set of performance targets\(^3\), to elevate the region’s progress to residents as well as invested stakeholders. In addition to performance targets, we also recommend that staff work with the board to create—and adopt—an implementation action plan (IAP). This IAP can be a tool to engage residents and stakeholders in the implementation of the plan, and increasing understanding of the plan, especially its role in transportation spending and limitations around land use. We recommend the IAP include clear and measurable actions towards RTP/SCS goals, including investment in existing communities (e.g., development of mini-grant programs, outreach and education efforts, infill incentive programs, etc.). Each action item should have a short timeline horizon (1-3 years) to allow for progress assessment between RTP/SCS updates.

**Prioritize affordable infill over greenfield development**

As we stated previously, we are excited to see the draft RTP/SCS plan for more multi-family homes; however, we are concerned that the 2018 draft does not adequately plan for affordable infill development. According to the 2018 draft performance measures, 15.2% of new

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environmental justice (income/race combined) households will be built within a half-mile of a transit stop. But 32.4% of all new households will be built within a half-mile of a transit stop. Research has shown that higher income household drive more than twice as many miles and own twice the number of vehicles as extremely low-income households living within ¼ mile of transit stops\(^4\); in addition, low-income households are more likely to ride transit than higher income households. We recommend the plan prioritize placing low-income communities closer to transit to ensure they are able to travel to work, school, and other places.

**Develop grants program to support active transportation and climate goals**

We also recommend the development of a grants program to improve active transportation and help meet SCS goals. Other Northern California MPOs, including Fresno COG and the Metropolitan Transportation Commission (MTC) have developed grant programs to promote sustainable infrastructure and non-infrastructure such as Safe Routes to School. The Fresno COG’s Sustainable Infrastructure Grant Program was approved in 2014 but only recently funded. In the Bay Area, the One Bay Area Grant (OBAG) program began in 2012 and resulted in an increase in active transportation investments, and resulted in 64 new Complete Streets policy resolutions\(^5\) in the Bay Area. Regional investments in these grants programs can also result in a stronger pipeline of projects that can successfully compete for state funding programs such as the state Active Transportation Program and the Affordable Housing and Sustainable Communities program.

We’re excited to continue to partner with you in this work, and we appreciate staff efforts to meet with advocates and concerned residents. The nature of the RTP/SCS is both highly technical and abstract. This format can make it challenging for residents and advocates to participate in the process. We would like to partner with you in future RTP/SCS updates to ensure that all residents fully understand the plan and how it will shape their regions. Also, we urge staff to present the complete draft and final plans in Spanish as well as English.

In closing, we believe that Stanislaus COG can be a leader in sustainable, equitable, and economically beneficial transportation and land use planning and can set an ambitious but achievable standard for similar regions. We welcome the opportunity to meet with staff to discuss these comments and recommendations as you work towards the final 2018 RTP/SCS plan.

Respectfully submitted,

Yolanda Park
*Program Manager, Catholic Charities Diocese of Stockton*

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\(^5\) [https://escholarship.org/uc/item/49w1v7wz#main](https://escholarship.org/uc/item/49w1v7wz#main). Accessed 30 April 2018.
Christopher Escárcega  
*Regional Engagement Coordinator, ClimatePlan*

Shivaugn M. Alves  
*Co-Founder, Patterson Progressive Alliance*

Martin Martinez  
*Northern California Regional Policy Manager, Safe Routes to School National Partnership*

Thomas Helme  
*Social and Environmental Justice Advocate, Valley Improvement Projects*

The Reverend Misael Avila  
*Saint Frances of Rome Catholic Church, Riverbank*

Elizabeth Claes  
*Member, Stanislaus Sustainable Communities Collaborative*

Edgar Garibay  
*Resident, City of Modesto*

CC:  
Elisabeth Hahn, Principal Planner, StanCOG  
Isael Ojeda, Associate Planner, StanCOG  
Lezlie Kimura Szeto, Manager - Sustainable Communities Policy and Planning, CARB  
Nesamani Kalandiyur, Manager - Transportation Analysis Section, CARB
Letter 12

COMMENTER: Yolanda Park

DATE: July 5, 2018

RESPONSE:

Response 12.1

The commenter commends StanCOG for addressing transportation needs of the communities in the region along with some positive trends in transit funding within the draft 2018 RTP/SCS. In addition, the commenter applauds StanCOG for the decrease in share of transportation funding for roadways, an increase in multi-family housing with less land conversion, and an expanded public participation effort prioritizing social equity.

Comment noted.

Response 12.2

The commenter would like clarity and transparency in GHG emissions reductions and VMT projections within the draft 2018 RTP/SCS.

While there is a relationship between GHG emission reductions and VMT projections, the two metrics are not directly comparable due to differences in baselines and methodology:

- Baseline: total VMT has been compared to existing conditions in 2015. GHG emissions are compared to a 2005 baseline as is required by SB375.
- Total VMT includes all travel within the county; GHG reductions exclude through-county trips (those that begin and end outside of Stanislaus County) as defined in CARB's technical methodology.
- SB375 specifies GHG reductions from passenger cars and light duty trucks only, while total VMT includes all vehicles traveling within Stanislaus County.

Based on differences in methodology between the two metrics, the relationship between total VMT reduction and GHG reductions as calculated for SB375 will be different depending on the mix of vehicles traveling in the area and the magnitude of trips that travel completely through the region.

The VMT per capita values requested can be calculated by dividing the total VMT over the projected population figures. Table 2-2 on page 29 in the draft Conformity Analysis of the 2019 FTIP and 2018 RTP contain projected population numbers and VMT data. Appendix C of the Draft Conformity Analysis contains documentation on how VMT and GHG emissions are calculated. Off model strategies and calculations for VMT reduction are explained in Appendix W (Off Model Adjustments) of the draft 2018 RTP/SCS.

The method of calculating VMT reduction is found in Appendix M (CARB SB 375 Methodology) of the Draft 2018 RTP/SCS. The GHG emissions are calculated using the Emissions Factor Model 2014 (EMFAC2014) model developed by the California Air Resources Board (CARB). EMFAC2014 uses
transportation data produced from the three county travel demand model outputs and converts those values to CO₂ emissions using VMT and speed distributions specific to the region.

Response 12.3

The commenter would like to see an increase in active transportation (ATP) funding within the plan. Between the adopted 2014 RTP/SCS and the draft 2018 RTP/SCS, there has been an increase in ATP funding from $225 million to $340 million; therefore, an additional $115 million in funding is dedicated to active transportation projects.

Response 12.4

The commenter would like to see a standardization of performance targets and the development of an implementation action plan for the draft 2018 RTP/SCS.

Comment noted.

Response 12.5

Commenter would like to see the draft 2018 RTP/SCS prioritize affordable infill over greenfield development. Commenter also noted a difference between percentage new environmental justice households (income/race combined) within half a mile of a transit stop compared to all new households within half a mile of a transit stop.

Comment noted.

Response 12.6

Commenter would like StanCOG to develop regional grants program to support active transportation and climate goals.

Comment noted.
STANISLAUS COUNTY ENVIRONMENTAL REVIEW COMMITTEE

July 5, 2018

Elisabeth Hahn, Valley Vision Stanislaus Project Manager
Stanislaus Council of Governments (StanCOG)
1111 “I” Street, Suite 308
Modesto, CA 95354

SUBJECT: ENVIRONMENTAL REFERRAL – STANCOG – DRAFT 2018 REGIONAL TRANSPORTATION PLAN (RTP)/SUSTAINABLE COMMUNITIES STRATEGY (SCS) AND DRAFT ENVIRONMENTAL IMPACT REPORT – NOTICE OF AVAILABILITY

Ms. Hahn:

Thank you for the opportunity to review the above-referenced project.

The Stanislaus County Environmental Review Committee (ERC) has reviewed the subject project and has no comments at this time.

The ERC appreciates the opportunity to review and comment on this project.

Sincerely,

Patrick Cavanah
Sr. Management Consultant
Environmental Review Committee

PC:ss

cc: ERC Members
Letter 13

COMMENTS:

Patrick Cavanah, Stanislaus County Environmental Review Committee  

DATE:  
July 5, 2018  

RESPONSE:

Response 13.1

The commenter states that they have reviewed the project and have no comments at this time.

Comment noted.
July 6, 2018

Elisabeth Hahn
Stanislaus Council of Governments
1111 I St., Suite 308
Modesto, CA 95354

Subject: 2018 regional Transportation Plan / Sustainable Communities Strategy
SCH#: 2017122057

Dear Elisabeth Hahn:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on July 5, 2018, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse
The proposed 2018 RTP/SCs is a long range planning document required by both state and federal law that will guide the development of transportation improvements throughout Stanislaus County. The 2018 RTP/SCS contains a compilation of the transportation system improvement projects proposed by StanCOG, as the state-designated RTPA for the county. The 2018 RTP/SCS includes the SCS pursuant to the requirements of SB 375. Accordingly, the 2018 RTP/SCS identifies transportation improvement projects and a land use scenario that would effectively meet SB 375 GHGe requirements.

Project Location

- County: Stanislaus
- City: Ceres, Hughson, Modesto, Newman, Oakdale, Riverbank, ...
- Region: Multiple
- Lat/Long: Multiple

Proximity to:

- Airports: Multiple
- Railways: Multiple
- Waterways: Multiple
- Schools: Multiple
- Land Use: Multiple as this project is an update of the 2014 RTP/SCS and includes various land use and zoning designations

Project Issues:

- Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Septic System; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Growth Inducing; Landuse; Cumulative Effects; Aesthetic/Visual; Other Issues

Reviewing Agencies:

- Resources Agency; Central Valley Flood Protection Board; Department of Fish and Wildlife, Region 4; Department of Parks and Recreation; Department of Water Resources; Caltrans, Division of Aeronautics; California Highway Patrol; Caltrans, District 10; Regional Water Quality Control Bd., Region 5 (Sacramento); Air Resources Board, Transportation Projects; Department of Toxic Substances Control; Native American Heritage Commission; California Energy Commission; Public Utilities Commission; State Lands Commission

Note: Blanks in data fields result from insufficient information provided by lead agency.
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Note: Blanks in data fields result from insufficient information provided by lead agency.
Letter 14

COMMENTER: Scott Morgan, Governor’s Office of Planning and Research, State Clearinghouse

DATE: July 6, 2018

RESPONSE:

Response 14.1

The commenter states that the State Clearinghouse submitted the Draft EIR to State agencies for review and provides a list of the agencies it provided with the Draft EIR. The commenter states that no State agencies submitted comments, and that compliance with State Clearinghouse review requirements has been completed.

Comment noted.
1. Miguel Donoso, Patterson Action Committee
   a. Made a statement on how the public participation process on the plan is inadequate.
   b. Believes that there has not been enough outreach to low income and minority members in the community.
   c. Requested that all the materials be translated into Spanish.
   d. Believes that the RTP/SCS is too technical and that very few people fully understand it.
   e. Believes that the county and cities in Stanislaus do not dedicate enough land for low income housing.
   f. Believes that the transit system does not reach enough low income or minority areas of the county.
   g. Stated that the meeting minutes for another Policy Board meeting reflects that MOVE received a check but the amount was not reported.
Letter 15

COMMENTER: Public Hearing #2 Comments
DATE: July 18, 2018

RESPONSE:

Response 15.1

Commenter stated that the public participation process in the RTP/SCS is inadequate.

Please refer to response 4.5.

Response 15.2

Commenter stated that there has not been enough outreach to low income and minority members in the community.

Please refer to response 4.5.

Response 15.3

Commenter would like to see all RTP/SCS materials translated into Spanish.

Comment noted.

Response 15.4

Commenter stated that the RTP/SCS is too technical and that very few people fully understand it.

Comment noted.

Response 15.5

Commenter stated that cities and county in the Stanislaus region do not dedicate enough land for low income housing.

StanCOG is a Regional Transportation Agency with no land use authority. Land use authority is the responsibility of the local incorporated areas or the county government.

Response 15.6

Commenter states that the transit system does not reach enough low income or minority areas of the county.

Comment noted.
Response 15.7

The commenter states that the meeting minutes for another Policy Board meeting reflects that MOVE received a check but the amount was not reported.

Comment noted.
To: StanCOG Policy Board Meeting, July 18, 2018

From: Miguel B. dos Santos

Subject: Public Hearing, Draft 2019 Regional Transportation Plan

I have a few issues:

1. Complaint of discrimination for the violation in the Federal and State
   Plans and a request for investigation on the StanCOG for many
   years against the low-income and minorities, especially the Hispanic communities.
   Under the public participation Plan in all the areas, from Public Notes, outreach, document
   and the reports and the committee, especially the reports
   that is so difficult to read and understanding for few people from
   Board and committee of StanCOG, Recommended Executive is in Spanish.

2. this report do not reflect the reality in the communities from the low-income and minorities in this county

3. the other issue is the Land use, is that Land in this county is so expensive
   that no developer want to do construction of Housing for low-income and minorities; one example in the city of Patterson that under 12 yrs for
   more right, because they will make Housing and apartments in Patterson, the land
   today is very expensive.

4. The Regional Plan Housing in this county is not real, because cities like
   Patterson; the cities and County are in violation of the Housing Element,
   every cities and the county council finish the Housing Element Review from the
   State, the city of Patterson is one example that in the 12 yrs, the only
   development were the construction of House at the price of $250,000
   250,000 and 300,000 $, the same is for the other cities and County.
   We have families living on garbage and the backyard of many homes.
   We have families living in one House, 2 or 3 families.

5. The Transportation Plan, in this county and cities do not doing what the
   Report saying; traffic in the city of Modesto, the buses have 0, 2 or 3
   persons with person, many stop buses, only the Mall especially in the
   Summer have 12 of the bus with persons, many stop buses do not
   have route on site for person, in camps, also all the information
   are bilingual, Bi-lingual, especially in the low-income and minorities.
We have many areas where the buses stay, do not have space for the buses, to stay. Especially in Brentwood area, the space how you get there, is a home.

The committees from StanCOG do not have low-income persons and for

the committees from StanCOG, do not have low-income persons and for

The minorities, only 1-2 members if. the county have 57 or 62% population are Hispanic, many committee do not have concern for the regular meetings, and many committee miss 3 to 4 months; the question is how this committee can't report to the report a Board, the State and Federal agencies, especially in the minority. From June 20, 2018, one consulting firm, Kenly Horn and Associates, have two contracts, one for the StanCOG and MOVE, that is in conflict of interest and not ethical. On other meeting of the Policy Board, the firm, Kenly Horn, was not report, and that minutes when R-Resolution is 17-41 professional agreement with Kenly Horn as, do not mention the cost for that agreement. Also this consulting do not understand the language and the culture, especially the Mexican and Mexican American. For the outreach and the Public meeting, how is possible that city of Patterson that have 62% Hispanic population go to a Public meeting, I have participated of 6 persons, we send a letter from 6/20/18 to the StanCOG Policy Board on the Draft 2018 Public Participation Plan (our att). We are here and continue doing the outreach and the participation of the low-income and minorities do not work, it's way we ask for investigation on Civil Rights have that are conduct or not understood.

Attn. J.B. Douglas
MIGUEL B. DOSO

cc. State Department Transportation
U.S. Department of Transportation
Congressman for District 10
State Senate
State Assembly
Letter 16

COMMENTER: Miguel Donosso, Patterson Action Committee

DATE: July 18, 2018

RESPONSE:

Response 16.1

The commenter has a complaint about discrimination from StanCOG regarding minority populations. In addition, commenter feels that the Public Participation Plan and other documents need to be translated in Spanish. Commenter also stated that the RTP/SCS does not reflect the reality of low income communities in the region.

In regards to the public participation process in the RTP/SCS, please refer to response 4.5. The StanCOG Public Participation Plan has been translated into Spanish.

Response 16.2

The commenter stated that the land use planning in the region does not dedicate enough land for low income housing.

StanCOG is a Regional Transportation Agency with no land use authority. Land use authority and zoning decisions are made by our local member jurisdictions (the nine cities and the county).

Response 16.3

The commenter states that the distribution of housing in the region is unfair, and gave an example of his hometown of Patterson not building enough low income housing.

StanCOG is a Regional Transportation Agency with no land use authority. Land use authority and zoning decisions are made by our local member jurisdictions (the nine cities and the county).

Response 16.4

The commenter states that the transit system does not reach enough low income or minority areas of the county.

Comment noted.

Response 16.5

The commenter states that the StanCOG standing committees do not have enough low-income persons or minorities.

Comment noted.
Response 16.6

The commenter refers to minutes from the June 20, 2018 Policy Board meeting and states that the consultant Kimley Horn & Associates has two contracts, one for StanCOG and one for MOVE that is a conflict of interest and is unethical.

Comment noted.

Response 16.7

The commenter states that the meeting minutes for another Policy Board meeting reflects that MOVE received a check but the amount was not reported and that Resolution 17-41 regarding a service agreement with Kimley Horn & Associates does not mention the cost for that agreement.

Comment noted.