



2045 Metropolitan Transportation Plan/ Sustainable Communities Strategy and Regional Transportation Plans for Monterey, San Benito and Santa Cruz Counties

Partially Recirculated Draft Environmental Impact Report

SCH#2020010204

prepared by

Association of Monterey Bay Area Governments

24580 Silver Cloud Court

Monterey, California 93940

Contact: Heather Adamson, Director of Planning

prepared with the assistance of

Rincon Consultants, Inc.

2511 Garden Road, Suite C-250

Monterey, California 93940

April 2022



RINCON CONSULTANTS, INC.

Environmental Scientists | Planners | Engineers

rinconconsultants.com

2045 Metropolitan Transportation Plan/ Sustainable Communities Strategy and Regional Transportation Plans for Monterey, San Benito and Santa Cruz Counties

Partially Recirculated Draft Environmental Impact Report

SCH#2020010204

prepared by

Association of Monterey Bay Area Governments

24580 Silver Cloud Court

Monterey, California 93940

Contact: Heather Adamson, Director of Planning

prepared with the assistance of

Rincon Consultants, Inc.

2511 Garden Road, Suite C-250

Monterey, California 93940

April 2022



RINCON CONSULTANTS, INC.

Environmental Scientists | Planners | Engineers

rinconconsultants.com

This report prepared on 50% recycled paper with 50% post-consumer content.

Table of Contents

- 1 Background Information and Summary of 2045 MTP/SCS Draft EIR Partially Recirculated Portion1-1
 - 1.1 Background1-1
 - 1.2 Summary of Revisions to the Draft EIR.....1-1
 - 1.2.1 Revised Section 6.4.2(h), Greenhouse Gas Emissions, Impact GHG-C-1.....1-1
 - 1.3 Partially Recirculated Draft EIR Process.....1-2
- 2 Revisions to the Draft EIR.....2-1
- 3 List of Preparers3-1

Association of Monterey Bay Area Governments
2045 MTP/SCS and Regional Transportation Plans for Monterey, San Benito, and Santa Cruz Counties

This page intentionally left blank.

1 Background Information and Summary of 2045 MTP/SCS Draft EIR Partially Recirculated Portion

1.1 Background

In accordance with Public Resources Code Section 21092.1 and CEQA Guidelines Section 15088.5, the Association of Monterey Bay Area Governments (AMBAG) has elected to recirculate a portion of the 2045 Metropolitan Transportation Plan/Sustainable Communities Strategy and Regional Transportation Plans for Monterey, San Benito, and Santa Cruz Counties (2045 MTP/SCS) Draft Environmental Impact Report (Draft EIR) (SCH #2020010204).

The California Environmental Quality Act (CEQA) requires a lead agency to issue new notice and to recirculate a revised EIR, or portions thereof, for additional commentary and consultation if, subsequent to the commencement of public review and interagency consultation but prior to final EIR certification, the lead agency adds “significant new information” to an EIR (see Pub. Resources Code, Section 21092.1; CEQA Guidelines, Section 15088.5; *Laurel Heights Improvement Association of San Francisco, Inc. v. Regents of the University of California* (1993) 6 Cal.4th 1112 (*Laurel Heights II*)).

Recirculation of a Draft EIR requires notice pursuant to CEQA Guidelines Section 15087, and consultation with responsible agencies, trustee agencies, agencies with jurisdiction by law over the project, and other entities pursuant to Section 15086 (see CEQA Guidelines, Section 15088.5, subd. (d)). Where an agency determines that recirculation is required, the agency can satisfy its obligation by reissuing only the revised part or parts of the EIR, rather than a whole new document. “If the revision is limited to a few chapters or portions of the EIR, the lead agency need only recirculate the chapters or portions that have been modified” (see CEQA Guidelines, Section 15088.5, subd. (c)).

1.2 Summary of Revisions to the Draft EIR

The CEQA Guidelines state that “[w]hen recirculating a revised EIR, either in whole or in part, the lead agency shall, in the revised EIR or by an attachment to the revised EIR, summarize the revisions made to the previously circulated draft EIR” (see CEQA Guidelines, Section 15088.5, subd. (g)).

1.2.1 Revised Section 6.4.2(h), Greenhouse Gas Emissions, Impact GHG-C-1

AMBAG has decided to recirculate a part of Section 6, *Other Statutory Considerations*, of the Draft EIR, specifically Section 6.4.2(h) (Greenhouse Gas Emissions), Impact GHG-C-1. This decision was made based on the fact that, after completion of the Draft EIR, AMBAG identified a clerical error indicating that the 2045 MTP/SCS would not have a cumulatively considerable contribution to a significant cumulative greenhouse gas (GHG) impact related

2045 MTP/SCS and Regional Transportation Plans for Monterey, San Benito, and Santa Cruz Counties

to exceeding state GHG reduction targets, when in actuality it would. As described in Section 4.8, *Greenhouse Gas Emissions/Climate Change*, of the Draft EIR, the 2045 MTP/SCS would have direct GHG impacts that conflict with state goals and impacts would be significant and unavoidable. Emissions of GHGs are inherently cumulative because the direct and indirect GHG emissions of a project combine with the GHG emissions of all other land uses and activities to cause global climate change impacts. Therefore, because the 2045 MTP/SCS would result in GHG emissions that have direct significant and unavoidable impacts related to exceeding state GHG reduction targets, the 2045 MTP/SCS must also contribute considerably to this significant cumulative impact of GHG emissions.

Accordingly, Impact GHG-C-1, set forth in Section 6.4.2(h) (Greenhouse Gas Emissions) of the Draft EIR, has been revised to identify the contribution of the 2045 MTP/SCS to the cumulative impact related to exceeding state GHG reduction targets as cumulatively considerable. Because GHG impacts are inherently cumulative and Section 4.8 of the Draft EIR already identified significant and unavoidable GHG impacts of the 2045 MTP/SCS related to exceeding state GHG reduction targets, the revisions to Impact GHG-C-1 in Section 6 are minor clarifications; they do not represent a new or substantially revised impact, nor include any new data or impact analysis not already included in the Draft EIR. The revisions to Impact GHG-C-1 set forth in revised Section 6.4.2(h) also make minor clarifications to the cumulative construction and operational emissions significance conclusions to make them more clearly consistent with Draft EIR Section 4.8.

Minor clarifications do not require recirculation or partial recirculation of a Draft EIR pursuant to CEQA Guidelines Section 15088.5. However, in the interests of full public disclosure and involvement, AMBAG has elected to recirculate the portion of Section 6 that includes Impact GHG-C-1 for additional public review and comment.

1.3 Partially Recirculated Draft EIR Process

When a lead agency chooses to recirculate only “portions” of a draft EIR, the lead agency may require commenters to limit their new comments to the new material in the recirculated portions of the prior document and preclude the commenters from commenting anew on topics or text not subject to a partial recirculation. CEQA Guidelines section 15088.5, subdivision (f)(2), provides: “When the EIR is revised only in part and the lead agency is recirculating only the revised chapters or portions of the EIR, the lead agency may request that reviewers limit their comments to the revised chapters or portions of the recirculated EIR.”

Please note that consistent with the CEQA Guidelines, AMBAG is requesting a that commenters limit their new comments to the partially recirculated portion of the Draft EIR, which is Section 6.4.2(h) (Greenhouse Gas Emissions) that pertains to Impact GHG-C-1. This recirculated text is provided in Section 2 of this Partially Recirculated Draft EIR. Reviewers should not resubmit comments on the Draft EIR. In the Final EIR, **AMBAG will only be responding to comments on the Partially Recirculated Draft EIR that comment on the recirculated text.**

Background Information and Summary of 2045 MTP/SCS Draft EIR Partially Recirculated Portion

In response to this Partially Recirculated Draft EIR, and to meet the consultation requirements of CEQA Guidelines § 15086, AMBAG is also posting a Notice of Availability of the Draft EIR. Posting of the Notice of Availability initiates a minimum 45-day comment period for the public to provide comments on the Partially Recirculated Draft EIR. The Notice of Availability of the Partially Recirculated Draft EIR was posted on the AMBAG website and local newspapers. The Partially Recirculated Draft EIR is available for review during normal business hours at the AMBAG offices at 24580 Silver Cloud Court, Monterey, CA 93940. The Partially Recirculated Draft EIR is also available online at: <https://ambag.org/plans/2045-metropolitan-transportation-plan-sustainable-communities-strategy>. Hard copies are available by request.

Following the close of the comment period, AMBAG will prepare a Final EIR. The Final EIR will include all comments received in writing during both comment periods (the original comment period and the comment period for the Partially Recirculated Draft EIR) along with responses to all of these comments. However, AMBAG will not be responding to comments on the Partially Recirculated Draft EIR that do not pertain to the recirculated text.

Association of Monterey Bay Area Governments
2045 MTP/SCS and Regional Transportation Plans for Monterey, San Benito, and Santa Cruz Counties

This page intentionally left blank.

2 Revisions to the Draft EIR

h. Greenhouse Gas Emissions

The impacts of GHG emissions described in Section 4.8 are, by definition, cumulative impacts, as they add to the global accumulation of greenhouse gases in the atmosphere. The cumulative impact analysis area for GHG emissions consists of the AMBAG region, adjoining counties, and the entire State of California. The entire state is included in the analysis area because GHG emissions from the AMBAG region and adjoining counties would influence the ability for the State to achieve its GHG reduction targets.

IMPACT GHG-C-1 DEVELOPMENT IN THE CUMULATIVE IMPACTS ANALYSIS AREA, AS WELL AS PROJECTS IMPLEMENTING THE 2045 MTP/SCS, WOULD GENERATE TEMPORARY SHORT-TERM GHG EMISSIONS WHICH WOULD RESULT IN A SIGNIFICANT CUMULATIVE IMPACT, AND THE 2045 MTP/SCS CONTRIBUTION WOULD BE CUMULATIVELY CONSIDERABLE. TOTAL OPERATIONAL GHG EMISSIONS WOULD NOT RESULT IN A SIGNIFICANT CUMULATIVE IMPACT, AND GENERATE A SIGNIFICANT INCREASE IN TOTAL GHG EMISSIONS FROM MOBILE AND LAND-USE SOURCES WHICH WOULD RESULT IN A SIGNIFICANT CUMULATIVE IMPACT. IMPLEMENTATION OF THE 2045 MTP/SCS WOULD NOT HAVE A CUMULATIVELY CONSIDERABLE CONTRIBUTION TO A SIGNIFICANT CUMULATIVE IMPACT RELATED TO EXCEEDING STATE GHG REDUCTION TARGETS TO THIS SIGNIFICANT CUMULATIVE IMPACT.

As discussed in Section 4.8, *Greenhouse Gas Emissions/Climate Change*, construction activities associated with transportation improvement projects and future land use projects envisioned by the 2045 MTP/SCS would generate temporary GHG emissions. The temporary construction GHG emissions would occur concurrent with ongoing GHG emissions in the cumulative impact analysis area, such as GHG emissions ongoing agricultural activities in Fresno County, an adjoining county to the east. As described in Section 4.8, *Greenhouse Gas Emissions/Climate Change*, construction-related GHG emissions of the 2045 MTP/SCS would be significant, even after implementation of Mitigation Measure GHG-1. Therefore, when construction emissions are combined with other ongoing emissions, the cumulative impact would be significant and the contribution of the 2045 MTP/SCS would be cumulatively considerable.

The transportation projects and land use scenario envisioned in the 2045 MTP/SCS would also generate operational GHG emissions. Implementation of Mitigation Measure GHG-~~24(a)~~24(a), transportation-related greenhouse gas reduction measures, and Mitigation Measures GHG-~~34(b)~~34(b), project level energy consumption and water use reduction, would reduce impacts related to GHG emissions. Overall, implementation of the 2045 MTP/SCS would reduce total region wide mobile and land use emissions compared to existing conditions, so the cumulative impact of total operational GHG emissions would not be significant. Other ongoing land uses and operation of future development in the cumulative impact analysis area would also generate GHG emissions. Combined, the GHG emissions from operational activities in the cumulative impact analysis area could exceed State reduction targets and the resulting cumulative impact would be significant, and tThe 2045 MTP/SCS would ~~not~~ have a

Association of Monterey Bay Area Governments

2045 MTP/SCS and Regional Transportation Plans for Monterey, San Benito, and Santa Cruz Counties

cumulatively considerable contribution to this cumulative impact, both pre- and post-mitigation.

3 List of Preparers

This Partially Recirculated Draft EIR was prepared by AMBAG, with the assistance of Rincon Consultants, Inc. AMBAG and consultant staff involved in the preparation of the EIR are listed below.

AMBAG

Maura F. Twomey, Executive Director
Heather Adamson, Director of Planning

RINCON CONSULTANTS, INC.

Megan Jones, MPP, Principal/Project Manager
George Dix, Assistant Project Manager

Association of Monterey Bay Area Governments
2045 MTP/SCS and Regional Transportation Plans for Monterey, San Benito, and Santa Cruz Counties

This page intentionally left blank.