CEQA Findings of Fact and Statement of Overriding Considerations

2025 BLUEPRINT

State Clearinghouse No. 2025020168

Sacramento Area Council of Governments
1415 L Street, Suite 300
Sacramento, CA 95814

November 2025

CEQA Findings of Fact and Statement of Overriding Considerations

2025 BLUEPRINT

November 2025

20240038.01

TABLE OF CONTENTS

Attachments

This page is intentionally left blank.

I. INTRODUCTION

The purpose of these findings is to satisfy the requirements of Sections 15091, 15092, and 15093 of the California Environmental Quality Act (CEQA) Guidelines, and relevant statutes associated with approval and implementation of the 2025 Metropolitan Transportation Plan / Sustainable Communities Strategy (2025 MTP/SCS or Blueprint).

The CEQA Statutes (Public Resources Code [PRC] Sections 21000 et seq.) and Guidelines (California Code of Regulations [CCR] Sections 15000 et seq.) state that, if it has been determined that a project may or will have significant impacts on the environment, an Environmental Impact Report (EIR) must be prepared. Prior to approval of the project, the EIR must be certified pursuant to Section 15090 of the CEQA Guidelines. When an EIR identifies one or more significant environmental impacts, the approving agency must make one or more of the following findings, accompanied by a brief explanation of the rationale, pursuant to Section 15091 of the CEQA Guidelines, for each identified significant impact:

a) Changes or alterations have been required in, or incorporated into, such project which avoid or substantially lessen the significant environmental effect as identified in the final environmental impact report.

b) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency, or can and should be adopted by such other agency.

c) Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the environmental impact report.

Section 15092 of the CEQA Guidelines states that, after consideration of an EIR, and in conjunction with making the Section 15091 findings identified above, the lead agency may decide whether or how to approve or carry out the project. A project that would result in a significant environmental impact cannot be approved if feasible mitigation measures or feasible alternatives can avoid or substantially lessen the impact. However, in the absence of feasible mitigation, an agency may approve a project with significant and unavoidable impacts, if there are specific economic, legal, social, technological, or other considerations that outweigh the unavoidable adverse environmental effects. Section 15093 of the CEQA Guidelines requires the lead agency to document and substantiate any such determination in "statements of overriding considerations" as a part of the record. The requirements of Sections 15091, 15092, and 15093 of the CEQA Guidelines as summarized above are all addressed herein. This document is intended to serve as the findings of fact and statement of overriding considerations authorized by those provisions of the CEQA Guidelines.

II. TERMINOLOGY OF FINDINGS

These findings use the same definitions and acronyms set forth in the EIR. In addition, for purposes of these findings, the terms listed below will have the following definitions:

- The term "mitigation measures" shall constitute the "changes or alterations" discussed above.
- The term "avoid or substantially lessen" will refer to the effectiveness of one or more of the mitigation measures or alternatives to reduce an otherwise significant environmental effect to a less than significant level.
- The term "feasible," pursuant to the CEQA Guidelines, means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors.

When the Sacramento Area Council of Governments (SACOG) Board of Directors (also referred to as "the Board") finds a measure is not feasible, it must provide evidence for its decision and may adopt substitute mitigation that is feasible, or may decide to modify the proposed mitigation. Modifications generally update, clarify, streamline, or revise the measure to comport with current industry practices, budget conditions, market conditions or existing SACOG policies, practices, and/or goals. Modifications achieve the intent of the proposed mitigation without reducing the level of protection.

III. PROJECT DESCRIPTION

A. PROJECT OVERVIEW

An MTP is a long-range (at least 20-year) comprehensive plan that is required for the region to qualify for some federal and state transportation funding for public transit, streets/roads, and bicycle and pedestrian improvements. Preparing the MTP is one of SACOG's primary statutory responsibilities under federal and state law. Under California's Sustainable Communities and Climate Protection Act, or Senate Bill (SB) 375 (Statutes of 2008, Chapter 728), SACOG is required to adopt an SCS as part of every MTP. The SCS must align transportation, housing, and land use decisions to help achieve the per-capita reduction targets for greenhouse gas (GHG) emissions from passenger vehicles that are set by the California Air Resources Board (CARB). The 2025 Blueprint aims to achieve various federal, state, regional, and local policy objectives related to sustainable development, transportation, and GHG emission reduction while considering financial, growth, and regulatory constraints. The plan is built on extensive data analysis, public outreach, and collaboration with local agencies and experts while being grounded in the board-adopted Triple Bottom Line framework, emphasizing a balanced approach to equity, economy, and environment.

B. PROJECT LOCATION

The plan area for the 2025 Blueprint includes El Dorado, Placer, Sacramento, Sutter, Yolo, and Yuba counties, exclusive of the Tahoe Basin. The SACOG region also includes 22 incorporated cities within its boundaries: Auburn, Citrus Heights, Colfax, Davis, Elk Grove, Folsom, Galt, Isleton, Lincoln, Live Oak, Loomis, Marysville, Placerville, Rancho Cordova, Rocklin, Roseville, Sacramento, West Sacramento, Wheatland, Winters, Woodland, and Yuba City. The plan area is approximately 6,000 square miles (3,846,837 acres) and is bounded by Colusa, Lake, Napa, and Solano counties to the west; Butte, Sierra, and Nevada counties to the north; the Lake Tahoe Basin, Plumas, and Alpine counties to the east; and Amador, San Joaquin, and Contra Costa counties to the south.

The bulk of the plan area is located in the Sacramento Valley, a basin generally bounded by the Sierra Nevada mountain range to the east and the coastal ranges to the west. The eastern portion of the region – Placer County, El Dorado County, and Eastern Yuba County – is located in the Sierra Nevada mountains and foothills. The western portion of the region, in Yolo County, marks the eastern edge of the coastal mountain ranges. North to south, the plan area spans from the lower Sacramento Valley in northern Sutter and Yuba counties to the Sacramento River Delta in southern Sacramento County. In the valley portion of the plan area – Sacramento County, western Placer County, western Yuba County, Sutter County, and eastern Yolo County – the topography is generally flat, with the exception of the Sutter Buttes mountain range in Sutter County.

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

C. PROJECT DETAILS

The 2025 Blueprint aims to achieve various federal, state, regional, and local policy objectives related to sustainable development, transportation, and GHG emission reduction while considering financial, growth, and regulatory constraints. The plan is built on extensive data analysis, public outreach, and collaboration with local agencies and experts. For the 2025 Blueprint, the forecast of growth (called the regional growth projections) was adopted by the SACOG board in 2022 and anticipates that the region will grow by approximately 580,000 people, and will add just over 260,000 new jobs, and 278,000 new homes. The 2025 Blueprint is designed to achieve the regional SB 375 GHG target while prioritizing maintenance and rehabilitation of existing infrastructure. It integrates smart land use planning principles with a diverse and efficient transportation network. The plan identifies targeted transportation investments, including new capital improvements (e.g., highways, roads, bridges, and light rail), policies such as roadway pricing strategies (e.g., tolling and mileage fees), and multimodal benefits aimed at connecting housing to jobs, managing congestion, and addressing forecasted travel volumes.

D. GENERAL PLAN CONSISTENCY

SB 375 does not require "a city's or county's land use policies and regulations, including its general plan, to be consistent with the regional transportation plan or an alternative planning strategy." (Government Code Section 65080[b][2][J].) Such a consistency analysis is not required because the goals and purposes of an MTP/SCS and of local governmental land use plans are intentionally and fundamentally distinct. As explained in the EIR, local government land use planning may be driven by a vision for a community that is not required to be constrained by specific economic or population forecasts, or by a mandated horizon date. The MTP/SCS must be a fiscally and time constrained plan, with a forecasted growth pattern that is consistent with—i.e., not exceeding—the amount of forecasted population, employment, and housing growth for the region. Further, SB 375 requires that an SCS utilize the most recent planning assumptions in consideration of general plans for local municipalities within SACOG's jurisdiction. (Government Code section 65080[b][2][B].)

Within this context, the Draft EIR describes the land use forecasting process, including analysis of local land use plans. Appendix D of the plan, which is cross-referenced in Chapter 2 of the Draft EIR, provides additional detail on the jurisdictional growth allocation methodology that relies upon local land use plans and a detailed summary, by jurisdiction, of the regional growth pattern.

E. PROJECT OBJECTIVES

The primary purpose of the 2025 Blueprint is to meet federal and state requirements. Within this framework, the objectives of the plan are to:

- Create opportunities for residents to live and work in equitable, environmentally healthy, and economically vibrant communities.
- Provide a mix of housing types in walkable places that are affordable, that have access to economic opportunity, and that allow people to spend less time driving.
- Revitalize commercial corridors, rural main streets, and green zones.[1]
- Create complete communities by bringing housing to the jobs and jobs to the housing.
- Protect agricultural and natural lands.
- Identify policies and strategies that reduce per capita, passenger vehicle-generated GHG emissions by 19 percent to achieve the target set by the California Air Resources Board (CARB) under SB 375.
- Implement innovative mobility projects, invest in high-capacity corridors and high-frequency bus service, prioritize lower cost transit solutions, and improve the responsiveness of the transportation system.
- Reduce per capita vehicle miles traveled (VMT).
- Build and maintain a safe, reliable, and multimodal transportation system.
- Find new and innovative ways to finance the costs of building and maintaining the transportation system in both the near- and long-term.
- Plan for natural disasters and extreme weather, including the need to evacuate or provide emergency services during natural disasters.

1 Established by local jurisdictions as part of a SACOG program known as Green Means Go, Green Zones are areas that have capacity for infill growth, but face market or other barriers that have prevented development from occurring.

F. DISCRETIONARY ACTIONS

EIR Certification. Before SACOG can adopt the 2025 Blueprint, it must certify that the EIR was completed in compliance with the requirements of CEQA, that the decision-making body has reviewed and considered the information in the EIR, and that the EIR reflects the independent judgment of the Board of Directors.

Certification of the EIR also requires adoption of (1) Mitigation Monitoring and Reporting Program (MMRP), which specifies the methods for monitoring mitigation measures required to eliminate or reduce the project's significant effects on the environment, (2) these Findings of Fact, and (3) a Statement of Overriding Considerations.

MTP/SCS Approval. The SACOG Board of Directors must adopt the MTP/SCS in order to satisfy various state and federal regulatory requirements and to implement the plan. The EIR analyzes the environmental impacts associated with implementation of the 2025 Blueprint for purposes of state law requirements; federal law exempts approval of a transportation plan from environmental review. (23 USC section 134[j].) The MTP/SCS also requires a conformity determination under the federal Clean Air Act Section 176(c). The Federal Highway Administration and the Federal Transit Administration make the final determination of conformity.

IV. TYPE OF EIR

SACOG prepared a program-level EIR as a first-tier document that addresses the environmental impacts that may result from adoption and implementation of the 2025 Blueprint. An advantage of a program EIR is that it allows the lead agency to consider broad policy alternatives and "program wide mitigation measures" at a time when the agency has greater flexibility to deal with basic problems or cumulative impacts. (CEQA Guidelines Section 15168[b][4].) The program EIR can serve as a first-tier document for later CEQA review of individual projects included in the program. These project-specific CEQA reviews will focus on project-specific impacts and mitigation measures and need not repeat the broad analyses contained in the program EIR. As discussed by the California Supreme Court, "it is proper for a lead agency to use its discretion to focus a first-tier EIR on only the…program, leaving project-specific details to subsequent EIRs when specific projects are considered." (In re Bay Delta (2008) 43 Cal. 4th 1143, 1174.)

A. ENVIRONMENTAL REVIEW PROCESS

In accordance with Section 15082 of the CEQA Guidelines, SACOG released a notice of preparation (NOP) on February 4, 2025. SACOG circulated the NOP to public, local, state, and federal agencies, and other interested parties for a 30-day review period to solicit comments on the scope of the EIR. SACOG also held two virtual scoping meetings on February 26 and February 27, 2025. Concerns raised in response to the NOP were considered during preparation of the Draft EIR.

SACOG published the Draft EIR for review by the public, local agencies, state agencies, federal agencies, and other interested parties for a 63-day period. The comment period closed on August 8, 2025. Nine comment letters were submitted on the Draft EIR from agencies and tribal organizations during the comment period. No comments were made on the Draft EIR by the general public.

On November 10, SACOG provided proposed written responses to all public agencies that submitted comments on the Draft EIR, pursuant to Public Resources Code section 21092.5 and CEQA Guidelines section 15088, 10 days prior to certification of the EIR. On November 3, 2025, SACOG published responses to all comments received on the Draft EIR in a Final EIR. This volume includes comments received on the Draft EIR, responses to significant environmental issues raised in the comments, and revisions to the text of the Draft EIR. On November 20, 2025, the SACOG Board of Directors will hold a public meeting to consider certifying the Final EIR and approving the 2025 Blueprint.

B. RECORD OF PROCEEDINGS

For the purposes of CEQA, and the findings herein set forth, the administrative record for the 2025 Blueprint consists of those items listed in PRC Section 21167.6, subdivision (e), and all documents cited or referenced in the 2025 Blueprint, the Draft EIR, and the Final EIR. Specifically, the record of proceedings for the Board of Director's decision on the plan consists of the following documents, at a minimum (Pub. Resources Code, Section 21167.6, subd. [e]):

- all NOP and other public notices issued by SACOG in conjunction with the plan;
- the Draft EIR (SCH# 2025020168), dated June 2025, and all appendices thereto;
- the Final EIR dated November 2025;
- documents cited or referenced in the Draft EIR and the Final EIR;
- all comments and correspondence submitted to SACOG and the Board of Directors on the Draft EIR and Final EIR with respect to the plan;
- the MMRP for the plan;
- all findings and resolutions adopted by the Board of Directors in connection with the plan, and all documents cited or referred to therein;
- all final reports, memoranda, maps, staff reports, or other planning documents relating to the plan prepared by SACOG, consultants to SACOG, or responsible or trustee agencies with respect to SACOG's compliance with the requirements of CEQA and with respect to SACOG's action on the plan;
- any minutes and/or verbatim transcripts of all information sessions, public meetings, and public hearings held in connection with the plan;
- any documentary or other evidence submitted at information sessions, public meetings and public hearings held in connection with the plan;
- matters of common knowledge to the Board of Directors, including, but not limited to, federal, state, and local laws and regulations;
- any documents expressly cited in these findings, in addition to those cited above; and
- any other materials required for the record of proceedings by PRC section 21167.6, subdivision (e).

C. CUSTODIAN OF THE RECORD

Pursuant to CEQA Guidelines Section 15091(e), the location and custodian of the documents and other materials which constitute the record of proceedings upon which these decisions are based is as follows:

Lanette Espinoza, Custodian of Records
1415 L Street, Floor 300
Sacramento, CA 95814
Telephone: (916) 321-9000
E-mail: lespinoza@sacog.org

The administrative record, including the EIR, is hereby incorporated by reference into these findings.

V. Findings Required Under CEQA

PRC Section 21002 provides that "public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects." The same statute provides that the procedures required by CEQA "are intended to assist public agencies in systematically identifying both the significant effects of projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects." For the purposes of CEQA, a mitigation measure is "feasible" if it is capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social and technological factors. (PRC Section 21061.1.) CEQA Guidelines Section 15364 adds another factor: "legal" considerations. (See also *Citizens of Goleta Valley v. Bd. of Supervisors* ("Goleta II") (1990) 52 Cal.3d 553, 565.) The concept of "feasibility" also encompasses the question of whether a particular alternative or mitigation measure promotes the underlying goals and objectives of a project. (*City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 410, 417.) Moreover, "'feasibility' under CEQA encompasses 'desirability' to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, legal, and technological factors." (***Ibid***.; see also *Sequoyah Hills Homeowners Assn. v. City of Oakland* (1993) 23 Cal.App.4th 704, 715.) SACOG, however, is not required to implement project modification or alternatives where such changes are infeasible or where the responsibility for modifying the project lies with some other agency. (CEQA Guidelines Section 15091(a) and (b).)

To comply with SB 375 and CEQA, the EIR proposes, and the MMRP identifies, potentially feasible mitigation to substantially lessen or avoid potentially significant environmental impacts of the 2025 Blueprint at the program level. Many of the mitigation measures identified in the EIR cannot be implemented by SACOG because undertaking "[s]uch changes or alternations are within the responsibility and jurisdiction of another public agency." (CEQA Guidelines Section 15091[a][2].) As described above, where SACOG does not have the discretion to implement mitigation measures identified in the EIR, SACOG must either find that "[s]uch changes have been adopted by such other agency or can and should be adopted by such other agency" or determine that "specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR." (CEQA Guidelines Sections 15091[a][2] and [a][3])

The Board of Directors cannot determine whether an agency with responsibility and jurisdiction over a future project contemplated in the 2025 Blueprint can feasibly adopt mitigation measures identified within the EIR at the programmatic level. Where SACOG lacks such responsibility and jurisdiction, it is the responsibility of the lead agency during future project-level environmental analysis to determine and adopt mitigation based on a local determination of feasibility. Because at this programmatic level SACOG cannot determine that every mitigation measure identified in the EIR can be implemented at the project level, SACOG cannot make the findings required under CEQA Guidelines Section 15091(a)(1) or (a)(2), for a number of significant effects identified in the EIR. In these instances, to approve the 2025 Blueprint, SACOG must make the findings required by CEQA Guidelines Section 15091(a)(3) which requires SACOG to "describe the specific reasons for rejecting identified mitigation measures…." (CEQA Guidelines Section 15091(c); see also *City of Marina v. Board of Trustees of California State University* (2006) 39 Cal. 4th 341, 366 [CEQA "does not require a public agency to undertake identified mitigation measures, even if those measures are necessary to address the project's significant environmental effects, if the agency finds that the measures "are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency"].) These findings constitute SACOG's best efforts to set forth the evidentiary and policy bases for its decision to approve the 2025 Blueprint in a manner consistent with the requirements of CEQA. To the extent that these findings conclude that various mitigation measures outlined in the EIR are feasible, are within SACOG's responsibility and jurisdiction, and have not been modified, superseded or withdrawn, SACOG hereby binds itself to implement these measures. These findings, in other words, are not merely informational, but rather constitute a binding set of obligations that are effectuated by SACOG's approval of a resolution adopting the 2025 Blueprint.

With respect to a project for which significant effects are not avoided or substantially lessened, a public agency, after adopting proper findings, may nevertheless approve the project if the agency first adopts a statement of overriding considerations setting forth the specific reasons why the agency finds that the project's benefits outweigh its unavoidable adverse environmental effects (Public Resources Code Section 21081[b]; CEQA Guidelines, Section 15093 and Section 15043[b]). The Board of Directors finds that the EIR has been compiled in compliance with CEQA and was presented to the Board, who reviewed and considered the information therein before approving the plan. The EIR reflects SACOG's independent judgment and analysis. These Findings constitute SACOG's evidentiary and policy bases for its decision to approve the 2025 Blueprint in a manner consistent with the requirements of CEQA.

A. FINDINGS REGARDING RECIRCULATION OF THE DRAFT EIR

The Draft EIR analyzed impacts associated with the June 2025 public review draft of the MTP/SCS for 2020-2050. Since the release of the Draft EIR, in response to public comments, Board of Directors considerations, and continued staff analysis, changes have been incorporated into the final MTP/SCS. There have also been some modifications to the Draft EIR, as documented in the Final EIR.

Under Section 15088.5 of the CEQA Guidelines, recirculation of an EIR is required when "significant new information" is added to the EIR after public notice is given of the availability of the Draft EIR for public review but prior to certification of the Final EIR. The term "information" can include changes in the project or environmental setting, as well as additional data or other information. New information added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement. "Significant new information" requiring recirculation includes, for example, a disclosure showing that:

> (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
>
> (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
>
> (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it.
>
> (4) The Draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR. The above standard is "not intend[ed] to promote endless rounds of revision and recirculation of EIRs." (*Laurel Heights Improvement Assn. v. Regents of the University of California* (1993) 6 Cal. 4th 1112, 1132.) "Recirculation was intended to be an exception, rather than the general rule." (*Ibid*.)

CEQA case law emphasizes that "'[t]he CEQA reporting process is not designed to freeze the ultimate proposal in the precise mold of the initial project; indeed, new and unforeseen insights may emerge during investigation, evoking revision of the original proposal.'" (*Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 736-737; see also *River Valley Preservation Project v. Metropolitan Transit Development Bd.* (1995) 37 Cal.App.4th 154, 168, fn. 11.) "'CEQA compels an interactive process of assessment of environmental impacts and responsive project modification which must be genuine. It must be open to the public, premised upon a full and meaningful disclosure of the scope, purposes, and effect of a consistently described project, with flexibility to respond to unforeseen insights that emerge from the process.' [Citation] In short, a project must be open for public discussion and subject to agency modification during the CEQA process." (*Concerned Citizens of Costa Mesa, Inc. v. 33rd Dist. Agricultural Assn.* (1986) 42 Cal.3d 929, 936; *Citizens for East Shore Parks v. State Lands Com.* (2011) 202 Cal.App.4th 549, 563 ["Administrative agencies not only can, but should, make appropriate adjustments… as the environmental review process unfolds."].)

The Board of Directors hereby finds that the potential impacts from the 2025 Blueprint fit within the range of impact analysis contained in the EIR. There are no substantial changes in the project or the circumstances under which the project is being undertaken, that necessitate revisions of the EIR. Nor has new information become available. The changes described in the Final EIR supplement or clarify the existing language. The circumstances, impacts, and mitigation requirements identified in the EIR remain applicable to the 2025 Blueprint, and support the finding that the final 2025 Blueprint does not raise any new issues and does not cause the levels of impacts identified in the EIR to be exceeded.

The final 2025 Blueprint does not result in any new impacts, nor does it cause the level of significance for any previously identified impacts to change. No new mitigation measures are required as a result of changes to the final 2025 Blueprint. Thus, no changes made since release of the Draft EIR involve "significant new information" triggering recirculation because the changes do not result in any new significant environmental effects, any substantial increase in the severity of any previously identified significant effects, or otherwise trigger recirculation. Instead, the modifications to the 2025 Blueprint and the EIR are either environmentally benign or environmentally neutral and, thus, represent the kinds of changes that commonly occur as the environmental review process works towards its conclusion. The Board of Directors hereby determines, based on the standards provided in Section 15088.5 of the CEQA Guidelines, that recirculation of the Draft EIR is not required.

B. MITIGATION MONITORING AND REPORTING PROGRAM

As required by PRC Section 21081.6, and Sections 15091(d) and 15097 of the CEQA Guidelines, SACOG, in adopting these findings, also adopts an MMRP. The MMRP is designed to ensure that, during all phases of implementation of the project, SACOG, and any other responsible parties where feasible, implement the adopted mitigation measures. This plan is contained in Exhibit A and is approved in conjunction with certification of the Final EIR and adoption of these Findings of Fact.

C. SIGNIFICANT EFFECTS AND MITIGATION MEASURES

The EIR identifies a number of significant and potentially significant environmental effects (or impacts) that may be caused in whole or in part by the 2025 Blueprint. Some of these significant effects can be fully avoided or substantially lessened through the adoption of the mitigation measures identified in this EIR. SB 375 makes clear that the legislation shall not be interpreted as superseding the land use authority of cities and counties. This mandate prohibits SACOG from compelling future lead agencies to adopt specific mitigation measures in approving specific land use projects. It is, therefore, the responsibility of each subsequent lead agency to independently review the identified mitigation measures and make a determination of the feasibility of each measure for a specific project.

As discussed in further detail below, some environmental effects cannot be fully avoided or substantially lessened through the adoption of feasible mitigation measures and thus may be significant and unavoidable. For reasons set forth in Section IX, "Statement of Overriding Considerations," however, the Board of Directors has determined that overriding economic, social, and other considerations outweigh the significant, unavoidable effects of the 2025 Blueprint.

The findings of the Board of Directors with respect to the project's significant effects and mitigation measures are set forth in the EIR and summarized below. This discussion does not attempt to describe the full analysis of each environmental impact contained in the EIR. Rather, the following information is provided: the impact statement, a summary of the analytical conclusions, summary of mitigation measures deemed potentially feasible by SACOG, and the findings of the Board. A full documentation of the environmental analysis and conclusions can be found in the EIR and associated record (described herein), both of which are incorporated by reference. The Board of Directors hereby ratifies, adopts and incorporates the analysis and explanation in the record into these findings, and ratifies, adopts and incorporates in these findings the determinations and conclusions of the EIR relating to environmental impacts and potential mitigation measures, except to the extent any such determinations and conclusions are specifically and expressly modified by these findings.

In the course of finalizing the EIR and 2025 Blueprint, SACOG has modified the proposed wording of a few mitigation measures presented in the EIR. The modifications are for purposes of clarification of the measure and implementation. These clarifications are not found to constitute "significant new information," as that term is defined in CEQA, unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that SACOG declines to implement. As discussed in Section VII.A, "Findings Regarding Recirculation of the Draft EIR," SACOG has determined based on substantial evidence in the record that the changes to the mitigation measure serve to clarify, amplify, or make insignificant modifications to an adequate EIR. Therefore, recirculation is not required because of these changes.

SACOG adopts all of the mitigation measures identified in the EIR. Implementation of most of the measures identified in the EIR is within the jurisdiction and control of other agencies. To the extent mitigation measures are within the jurisdiction of other agencies, and not SACOG, the findings identify whether the proposed mitigation measures would potentially reduce identified impacts to a less than significant level. However, where SACOG lacks the responsibility and jurisdiction to implement proposed mitigation measures and a local determination of feasibility is required to determine whether the agency with jurisdiction can feasibly adopt identified mitigation measures, SACOG finds that the impacts remain significant and unavoidable.

Pursuant to PRC Sections 21155.2(a) and (b)(2) and Section 21159.28(a), in order to take advantage of CEQA streamlining benefits allowed under SB 375, projects that seek to tier from the EIR must incorporate the mitigation measures identified in Exhibit A to these Findings or, if the identified mitigation is found to be infeasible based on substantial evidence, the project must incorporate equivalent measures that avoid or mitigate potential impacts.

In these findings, SACOG discusses each potential environmental impact analyzed in the EIR. Where an impact is less than significant for land use and transportation projects, the discussion of the impact in these findings is brief because PRC Section 21081 and CEQA Guidelines Section 15091 do not require findings of fact for impacts that are less than significant. Where an impact is determined to be significant before mitigation, the findings describe the potential mitigation measure(s) adopted by SACOG to mitigate each potentially significant impact identified in the EIR. For each impact that is significant before mitigation, SACOG also sets forth its conclusions under the heading "Findings" as to whether the identified mitigation measures will reduce the impact to a less than significant level. Where an impact will remain significant and unavoidable, including where SACOG has no jurisdiction to impose a potential mitigation measure, SACOG identifies the specific reasons for why the mitigation measures are unable to reduce the impact to a less-than-significant level.

Based on the discussion of impacts in Chapter 3 of the Draft EIR, as well as relevant responses to comments in the Final EIR and other evidence in the record, the SACOG Board of Directors hereby finds the environmental impacts of the 2025 Blueprint to be as follows:

1. Aesthetics

Impact 3.1-1: Have a Substantial Adverse Effect on a Scenic Vista

This impact is analyzed for adverse effects of Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 3.1-18 through 3.1-20 of the Draft EIR.

Significance before Mitigation

Implementation of the 2025 Blueprint, including regional growth, land use changes, and planned transportation improvements, could result in vertical growth in urbanized areas and some new development and transportation facilities in less urbanized and rural areas that could adversely affect views of scenic vistas. Therefore, impacts would be **potentially significant**.

Mitigation

Mitigation Measure 3.1-1: Protect Public Views of Important Scenic Vistas, Scenic Resources Along State Scenic Highways, and Visual Character and Quality

The implementing agency shall protect public views of important scenic vistas, scenic resources, and visual character and quality by taking the following (or equivalent) actions for projects that would significantly affect such resources:

- require that the design of new development provide appropriate transitions in building height and bulk that are sensitive to the physical and visual character of adjoining neighborhoods that have lower development intensities and building heights;
- ensure building heights stepped back from sensitive adjoining uses to maintain appropriate transitions in scale and to protect scenic vistas;
- avoid siting electric towers, solar power facilities, wind power facilities, communication transmission facilities and/or above ground lines along scenic roadways and routes, to the maximum extent feasible;
- reduce visual effects of projects and activities such that they do not obscure, detract from, or substantially negatively affect the quality of views from designated scenic roadways or scenic highways through project design changes; and
- comply with other local general plan policies and regulations related to the protection of public views of important scenic vistas, scenic resources along a state scenic highway, and visual character and quality.

Mitigation Measure 3.1-2: Design River Crossings to Minimize Aesthetic and Visual Impacts to the Greatest Feasible Extent

The implementing agency shall design river crossings to protect public views of important scenic vistas, scenic resources along a state scenic highway, and visual character and quality. Such design elements could include:

- scale, features, and dimensions that are architecturally pleasing and contextually appropriate for the adjacent neighborhoods;
- sizing that meets but does not exceed the capacity of the approach roadway; and
- design elements that obscure, detract from, or negatively affect the quality of views from public viewing areas shall be prohibited.

Findings after Mitigation

The Board of Directors finds that adoption and implementation of Mitigation Measures 3.1-1 and 3.1-2 will reduce the impacts to a less-than-significant level. SACOG does not have the authority to require the implementing agencies to adopt the identified mitigation measures; the mitigation measures are within the responsibility and jurisdiction of another public agency. SB 743 eliminates the need to evaluate aesthetic impacts of a project if it is 1) a residential, mixed-use residential, or employment center project; 2) located on an infill site within a transit priority area; and 3) does not impact historic or cultural resources. For projects that meet these criteria, the impacts to the aesthetic environment would not be treated as significant environmental impacts (PRC Section 21099[d][1]).

Impact 3.2-1 remains significant and unavoidable for purposes of program-level review. Implementation of the mitigation measures above or other comparable measures identified by the lead agency at a project-level would reduce potential impacts on scenic vistas, and agencies with jurisdiction to adopt these measures can and should do so (PRC Section 21081(a)(1), (2).)

Impact 3.1-2: Substantially Damage Scenic Resources, Including, but Not Limited to, Trees, Rock Outcroppings, and Historic Buildings Along a State Scenic Highway

This impact is analyzed for adverse effects of Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 3.1-20 through 3.1-23 of the Draft EIR.

Significance before Mitigation

Development along officially designated state scenic highway corridors is unlikely to result in changes that would damage scenic resources, such as trees, rock outcroppings, and historic buildings, largely due to Corridor Protection Programs that safeguard scenic corridors from encroaching development. In addition to Caltrans' regulations, many local jurisdictions have their own general plan policies relating to the protection of scenic resources that control the size and scale of land development to maintain visual compatibility with the natural and built environments. These policies may limit the amount or type of development in designated scenic corridors or require special design guidelines when developing in certain areas.

Most of the transportation projects in the 2025 Blueprint would be associated with existing transportation infrastructure. Where the projects either directly affect a scenic highway or could adversely affect views from a scenic highway, the design of the project would typically be subject to a design review to limit the effects in a manner consistent with state and local policies. However, because scenic resources are protected differently among the various jurisdictions in the plan area and because two official scenic highways and five eligible scenic highways are located within the plan area, it is possible that implementation of the 2025 Blueprint could damage scenic resources along state scenic highways. Therefore, impacts would be **potentially significant**.

Mitigation

Implement Mitigation Measure 3.1-1: Protect Public Views of Important Scenic Vistas, Scenic Resources Along State Scenic Highways, and Visual Character and Quality

Findings after Mitigation

The Board of Directors finds that adoption and implementation of Mitigation Measure 3.1-1 will reduce the impacts to a less than significant level. SACOG does not have the authority to require the implementing agencies to adopt the identified mitigation measures; the mitigation measures are within the responsibility and jurisdiction of another public agency. SB 743 eliminates the need to evaluate aesthetic impacts of a project if it is 1) a residential, mixed-use residential, or employment center project; 2) located on an infill site within a transit priority area; and 3) does not impact historic or cultural resources. For projects that meet these criteria, the impacts to the aesthetic environment would not be treated as significant environmental impacts (PRC Section 21099[d][1]).

Impact 3.1-2 remains significant and unavoidable for purposes of program-level review. Implementation of the above mitigation measure or other comparable measure identified by the lead agency at a project-level would reduce potential impacts on scenic resources along state scenic highways, and agencies with jurisdiction to adopt these measures can and should do so (PRC Section 21081(a)(1), (2).)

Impact 3.1-3: Substantially Degrade the Existing Visual Character or Quality of Public Views of the Site and Its Surroundings in Non-Urbanized Areas

This impact is analyzed for adverse effects of Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 3.1-23 through 3.1-25 of the Draft EIR.

Significance before Mitigation

Implementation of the 2025 Blueprint would result in regional growth, land use changes, and transportation improvements that could change the visual character or quality of public views of sites and their surroundings. In Developing Communities specifically, the change from rural or undeveloped views to urban or suburban land uses may be considered a degradation of the visual character or quality of the area. Depending on the nature and scale of the changes, implementation of the 2025 Blueprint would result in a **potentially significant** impact related to visual character or quality of public views.

Mitigation

Mitigation Measure 3.1-3: Design Projects to be Visually Compatible with Surrounding Areas

The implementing agency shall require measures for projects that would significantly affect visual resources that minimize contrasts in scale and massing between the project and surrounding natural forms and developments. Strategies to achieve this may include:

- to the extent feasible, avoiding large cuts and fills when the visual environment would be substantially disrupted; disrupted;
- siting or designing projects to minimize their intrusion into important viewsheds;
- using contour grading to match surrounding terrain;
- developing transportation systems to be compatible with the surrounding environments (e.g., colors and materials of construction material; scale of improvements);
- avoiding the use of non-native landscaping; if exotic vegetation is used, it should be used as screening and landscaping that blends in and complements the natural landscape;
- protecting or replacing aesthetically significant trees in the project area;
- using grading that blends with the adjacent landforms and topography;
- landscaping new slopes and embankments with compatible grasses, shrubs, and trees to soften cuts and edges; and
- designing new structures to be compatible in scale, mass, character, and architecture with existing structures.

Findings after Mitigation

SB 743 eliminates the need to evaluate aesthetic impacts of a project if it is 1) a residential, mixed-use residential, or employment center project; 2) located on an infill site within a transit priority area; and 3) does not impact historic or cultural resources. For projects that meet these criteria, the impacts to the aesthetic environment would not be treated as significant environmental impacts (PRC Section 21099[d][1]).

Impact 3.1-3 remains significant and unavoidable for purposes of program-level review. Implementation of the above mitigation measure or other comparable measure identified by the lead agency at a project level would reduce impacts related to visual character or quality of public views, and agencies with jurisdiction to adopt these measures can and should do so (PRC Section 21081 (a)(1), (2).) Moreover, specific economic, legal, social, technological, or other considerations, make identification of additional mitigation measures infeasible at the plan level.

Impact 3.1-4: Conflict with Applicable Zoning and Other Regulations Governing Scenic Quality in Urban Areas

This impact is analyzed for adverse effects of Regional Growth and Land Use Change and Transportation Network Improvements and Programs on page 3.1-25 of the Draft EIR.

Significance before Mitigation

The land use changes and transportation improvements associated with the implementation of the 2025 Blueprint would not conflict with existing zoning laws or other regulations because local agencies would require compliance with applicable regulations, including those governing scenic quality, before issuing permits for land use projects. Therefore, impacts would be **less than significant.**

The less-than-significant impact determination is confirmed by the Board of Directors based on the evidence and analysis provided in the record.

Impact 3.1-5: Create a New Source of Substantial Light or Glare Which Would Adversely Affect Day or Nighttime Views in the Area

This impact is analyzed for adverse effects of Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 3.1-26 through 3.1-28 of the Draft EIR.

Significance before Mitigation

In less developed areas of the region, where existing sources of light and glare are not as prevalent, new housing and employment projects could create new sources of light and glare. Any substantial new sources of light or glare could affect existing nighttime views. Lighting requirements are guided by standards set by local jurisdictions. In addition, many jurisdictions have general plan policies and other relevant regulations relating to the protection of night skies and the prevention of obtrusive lighting. Typical measures include the use of downward-directed and shielded lighting. New development would be required to comply with the applicable lighting standards, and the location, type, and direction of the lighting. A lighting plan is typically required to be submitted to planning departments during the development review process. However, adherence to lighting standards may not be applicable to all types of development projects, and light and glare impacts may occur in some areas. In addition, where new transportation facilities are constructed, there is a potential that these projects could create a new source of substantial light or glare. Impacts of light and glare from the implementation of the 2025 Blueprint would be **potentially significant**.

Mitigation

Mitigation Measure 3.1-4: Reduce Sun Glare Resulting from Implementation of Planned Transportation Improvements

The implementing agency shall require measures that would minimize and control glare from planned transportation improvements that would result in significant glare impacts through the adoption of project design features that reduce glare. These features include:

- planting trees along transportation corridors to reduce glare from the sun;
- creating tree wells in existing sidewalks;
- adding trees in new curb extensions and traffic circles;
- adding trees to public parks and greenways; and
- landscaping off-street parking areas, loading areas, and service areas.

Tree species planted to comply with this measure shall provide significant shade cover when mature. Utilities shall be installed underground along these routes wherever feasible to allow trees to grow and provide shade without need for severe pruning.

Mitigation Measure 3.1-5: Design Structures to Avoid or Reduce Impacts Resulting from Sun Glare

The implementing agency shall require measures that would minimize and control glare from implementation of the projected land use pattern and planned transportation improvements through the adoption of project design features that reduce glare for projects that would cause significant glare impacts. These features include:

- limiting the use of reflective materials, such as metal;
- using non-reflective material, such as paint, vegetative screening, matte finish coatings, and masonry;
- screening parking areas by using vegetation or trees;
- using low-reflective glass; and
- complying with applicable general plan policies or local controls related to glare.

Mitigation Measure 3.1-6: Design Structures to Avoid or Reduce Impacts Resulting from Nighttime Light and Glare

The implementing agency shall impose lighting standards on projects that would cause significant nighttime light and glare impacts that ensure that minimum safety and security needs are addressed and minimize light trespass and glare. These standards include the following:

- minimizing incidental spillover of light onto adjacent private properties and undeveloped open space,
- directing luminaries away from habitat and open space areas adjacent to the project sites,
- installing luminaries with a minimum Color Rendering Index rating of 90 which provides good color rendering and natural light qualities, and
- minimizing the potential for back scatter into the nighttime sky and for incidental spillover of light onto adjacent private properties and undeveloped open space.

Findings after Mitigation

The Board of Directors finds that adoption and implementation of Mitigation Measures 3.1-4, 3.1-5, and 3.1-6 will reduce the impacts to a less-than-significant level. SACOG does not have the authority to require the implementing agencies to adopt the identified mitigation measures; the mitigation measures are within the responsibility and jurisdiction of another public agency. SB 743 eliminates the need to evaluate aesthetic impacts of a project if it is 1) a residential, mixed-use residential, or employment center project; 2) located on an infill site within a transit priority area; and 3) does not impact historic or cultural resources. For projects that meet these criteria, the impacts to the aesthetic environment would not be treated as significant environmental impacts (PRC Section 21099[d][1]).

Impact 3.1-5 remains significant and unavoidable for purposes of program-level review. Implementation of the above mitigation measures or other comparable measures identified by the lead agency at a project level would reduce potential impacts related to glare and light, and agencies with jurisdiction to adopt these measures should do so (PRC Section 21081(a)(1), (2).)

2. Agriculture and Forestry Resources

Impact 3.2-1: Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to Non-Agricultural Use

This impact is analyzed for adverse effects of Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 3.2-17 through 3.2-18 of the Draft EIR.

Significance before Mitigation

Together, the projected land use pattern and planned transportation improvements have the potential to impact 1,008 acres of Prime Farmland, 415 acres of Unique Farmland, and 1,329 acres of Farmland of Statewide Importance for a combined potential impact to 2,752 acres of Farmland. The 2,752 acres of FMMP-designated farmland that may be impacted represents approximately 4.8 percent of the total 56,810 acres of new development anticipated under the 2025 Blueprint and approximately 0.3 percent of all existing FMMP-designated farmland in the region. The impact of the 2025 Blueprint to farmland conversion would be **potentially significant**.

Mitigation

Mitigation Measure 3.2-1: Provide for Permanent Protection of Farmland

The implementing agency shall mitigate loss of such farmland by adopting measures that may include but are not limited to the following:

- Provide permanent protection of in-kind farmland at a minimum 1:1 ratio of comparable quality land, in the form of easements, fees, or elimination of development rights/potential.

- Locate the easement within the same city or community or city in which the conversion occurs; if easements within the same community or city are not available or otherwise feasible to obtain, the easement shall be in as close proximity as possible to the same city or community in which the conversion occurs.

Findings after Mitigation

Due to the importance of the region's agricultural resources, impacts on Farmland are found to be significant and unavoidable. If the implementing agency adopts this mitigation measure, Impact 3.2-1 may be reduced, but not to a less than significant level, because net loss of agricultural land would still occur. Additionally, SACOG cannot require the implementing agency to adopt this mitigation measure, and it is ultimately the responsibility of the implementing agency to determine and adopt project-specific mitigation.

Impact 3.2-1 remains significant and unavoidable for purposes of this program-level review. Implementation of the above mitigation measure or other comparable measures identified by the lead agency at a project-level would reduce the impacts to FMMP farmland, and agencies with jurisdiction to adopt these measures can and should do so (PRC Section 21081(a)(1), (2).) Moreover, specific economic, legal, social, technological, or other considerations, make identification of additional mitigation measures infeasible at the plan level.

Impact 3.2-2: Conflict with Existing Zoning or General Plan Land Use Designations for Agricultural Use, or with a Williamson Act Contract

This impact is analyzed for adverse effects of Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 3.2-19 through 3.2-20 of the Draft EIR.

Significance before Mitigation

Together, the projected land use pattern and planned transportation improvements have the potential to convert 762 acres of land designated for agriculture and Williamson Act contracted lands. Because the non-agricultural uses and infrastructure may result in conflicts with these plans and contracts, the impact of the 2025 Blueprint would be **potentially significant**.

Mitigation

No feasible mitigation measures exist to reduce the impact.

Findings after Mitigation

Due to the importance of the region's agricultural resources, impacts on zoned or general plan designated agricultural lands and Williamson Act lands are found to be significant and unavoidable. The regional development pattern could result in the conversion of land zoned or designated for agriculture, which would conflict with these existing designations. Mitigation would not eliminate the potential for conflict with protective land use designations to occur. At the project level, implementing agencies may require the evaluation of alternative development locations that avoid agricultural land conversion. Implementing agencies may also approve plan amendments and rezones to bring any conflicting development or transportation infrastructure into compliance with plans and zoning, such that no significant impact would occur.

Impact 3.2-2 would be significant and unavoidable for purposes of this program-level review. The plan cannot maintain consistency will all adopted agricultural zoning and Williamson Act contracts while achieving the regulatory obligations of an MTP/SCS. Moreover, SACOG does not have land use authority and cannot change local zoning or negotiate Williamson Act contracts. Therefore, specific considerations make mitigation infeasible. Moreover, specific economic, legal, social, technological, or other considerations, make identification of additional mitigation measures infeasible at the plan level. (PRC Section 21081(a)(3).)

Impact 3.2-3: Conflict with Existing Zoning or Land Use Designation for, or Cause Rezoning of, Forest Land, Timberland, or Timberland Zoned Timberland Production

This impact is analyzed for adverse effects of Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 3.2-20 through 3.2-21 of the Draft EIR.

Significance before Mitigation

By focusing on providing small-lot and attached housing, maximizing infill and redevelopment opportunities, and planning for communities with a mix of uses, the 2025 Blueprint would create a compact land use pattern that would minimize impacts on forest land and timberland. The regional growth pattern of the 2025 Blueprint does not overlap with any land designated by an existing general plan for forest land or timberland.

The planned transportation improvements of the 2025 Blueprint would potentially affect 223 acres of land designated for forest land, timberland, or timberland production in a local land use plan but would not affect any areas zoned for these uses. The planned transportation improvements of the 2025 Blueprint would potentially conflict with or cause general plan amendments for 6 acres of land designated as forest land or timberland. In rural residential communities and 217 acres in lands not identified for development in the 2025 Blueprint planning period.

Together, the projected land use pattern and planned transportation improvements have the potential to impact land designated as forest land, timberland, or timberland production. The potential for the 2025 Blueprint to conflict with existing zoning or land use designations or cause rezoning of forest land, timberland, or timberland production would be **potentially significant**.

Mitigation

No feasible mitigation measures exist to reduce the impact.

Findings after Mitigation

The conversion of land that is zoned or designated forest land or timberland cannot be feasibly mitigated. However, individual agencies may require the evaluation of alternative development locations that avoid forest land conversion or approve plan amendments and rezones to bring any conflicting development or transportation infrastructure into compliance with plans and zoning, such that no significant impact would occur.

Impact 3.2-3 would be significant and unavoidable for purposes of this program-level review. The plan cannot maintain consistency will all adopted land use and zoning designations while achieving all of the regulatory obligations of an MTP/SCS. Moreover, SACOG does not have land use authority and cannot change local zoning. Therefore, specific considerations make mitigation infeasible. (PRC Section 21081(a)(3).)

Impact 3.2-4: Result in the Loss of Forest Land or Conversion of Forest Land to Non-Forest Use

This impact is analyzed for adverse effects of Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 3.2-21 through 3.2-23 of the Draft EIR.

Significance before Mitigation

Together, the projected land use pattern and planned transportation improvements have the potential to impact 584 acres of conifer forest and 2,132 acres of hardwood forest for a total of 2,716 acres. As a total of all state-designated forest land within the region, forest land that has the potential to be impacted by the projected land use pattern and planned transportation improvements associated with implementation of the 2025 Blueprint includes approximately 0.2 percent of total forest area in the plan area. While these impacts appear relatively small from a regional perspective, due to the importance of the region's forestry resources, these impacts are considered **potentially significant**.

Mitigation

Mitigation Measure 3.2-2: Provide for Permanent Protection of Forest Land and Timberland

The implementing agency shall mitigate for loss of forest land or timberland by providing permanent protection of in-kind forest land or timberland at a minimum 1:1 ratio of comparable quality land, in the form of easements, fees, or elimination of development rights/potential. If feasible, the easement should be located within or in proximity to the land that is converted.

Findings after Mitigation

If the implementing agency adopts this mitigation measure, Impact 3.2-4 would help protect existing forest and timberland in the region from conversion; however, it would not reduce the significant impact associated with conversion of these resources. Additionally, because SACOG cannot require the implementing agency to adopt this mitigation measure, it is ultimately the responsibility of the implementing agency to determine and adopt project-specific mitigation. Therefore, due to the importance of the region’s forestry resources, these impacts on forest land remain significant and unavoidable for purposes of this program-level review. SACOG does not have the authority to require implementing agencies to adopt identified mitigation measures; the mitigation measures are within the responsibility and jurisdiction of another public agency. However, implementation of the measure above or other comparable measures identified by the lead agency at a project level would reduce impacts to forest land, and agencies with jurisdiction to adopt these measures can and should do so (PRC Section 21081(a)(1),(2).)

Impact 3.2-5: Involve Other Changes in the Existing Environment that could Result in Conversion of Farmland to Non-Agricultural

This impact is analyzed for adverse effects of Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 3.2-23 through 3.2-25 of the Draft EIR.

Significance before Mitigation

The 2025 Blueprint is designed to improve transportation options and increase development within Center and Corridor Communities and Established Communities, limiting the rural-urban interface and associated development pressures. Nonetheless, because the 2025 Blueprint would result in conversion of farmland to non-agricultural use, the plan could indirectly result in the conversion of farmland to non-agricultural use related to the edge effects at the rural-urban interface. This impact would be **potentially significant**.

Mitigation

Mitigation Measure 3.2-3: Minimize Indirect Conversion of Farmland to Non-Agricultural Use

Implementing agencies shall require project proponents to:

- Design proposed projects to minimize, to the greatest extent feasible, the loss of the highest valued farmland.
- Redesign project features to minimize fragmenting or isolating farmland. Where a project involves acquiring land or easements, ensure that the remaining farmland is of a size sufficient to allow economically viable farming operations. This would avoid the fragmentation or isolation of farmland in a way that would not allow for economically viable farming operations which could increase the risk of it being indirectly converted to non-agricultural uses. The project proponents shall be responsible for acquiring easements, making lot line adjustments, and merging affected land parcels into units suitable for continued commercial agricultural management.
- Reconnect utilities or infrastructure that serve agricultural uses if these are disturbed by project construction. If a project temporarily or permanently cuts off roadway access or removes utility lines, irrigation features, or other infrastructure, the project proponents shall be responsible for restoring access as necessary to ensure that economically viable farming operations are not interrupted.

- Manage project operations to minimize the introduction of invasive species or weeds that may affect agricultural production on adjacent agricultural land. Where a project has the potential to introduce sensitive species or habitats or have other spill-over effects on nearby agricultural lands, the project proponents shall be responsible for acquiring easements on nearby agricultural land and/or financially compensating for indirect effects on nearby agricultural land. Easements (e.g., flowage easements) shall be required for temporary or intermittent interruption in farming activities (e.g., because of seasonal flooding or groundwater seepage). Acquisition or compensation would be required for permanent or significant loss of economically viable operations.
- Align corridors, incorporate buffer zones and setbacks, and integrate berms and fencing to avoid agricultural lands and to reduce conflicts with agricultural lands.
- Minimize severance and fragmentation of agricultural land by constructing underpasses and overpasses at reasonable intervals to provide property access.
- Provide buffers, berms, setbacks, fencing, or other project design measures to protect surrounding agriculture, and to reduce conflict with farming that could result from implementation of transportation improvements and/or projected land use pattern included as a part of the 2025 Blueprint.
- Implement other feasible conservation tools, such as those recommended by the California Department of Conservation Division of Land Resource Protection.
- Require project applicants to agree to provide real estate disclosures explaining farmers' rights to purchasers or lessees as a condition of project approval for projects located in active farming areas.
- Incorporate the use of agricultural buffers, as appropriate, to reduce land use conflicts with farming operations.

Mitigation Measure 3.2-4: Manage Growth at the Rural-Urban Interface to Support the Long-Term Viability of Agriculture

The implementing agency shall avoid or minimize pressure to convert agriculture land at the urban edge to non-agricultural uses by adopting regulations that enforce the innovations and best practices identified to minimize conversion pressures on farmland. Examples include but are not limited to:

- **Agriculture Buffers:** Buffers, generally imposed on new development, can assist in reducing urban land use conflicts with farming operations. Invest in urban edge agricultural operations that reinforce the effectiveness and permanence of buffers, create education and training opportunities, and generate a revenue stream that supports buffer acquisition and maintenance.
- **Right-to-Farm Ordinances:** These ordinances require project applicants to agree to provide real estate disclosures explaining farmers' rights to purchasers or lessees as a condition of project approval for projects located in active farming areas. The intent of such an ordinance is to protect farmers from nuisance complaints and enforcement actions.
- **Infill and Redevelopment Policies:** These policies, which are supportive of infill and redevelopment and consistent with the policy objectives of the 2025 Blueprint and SB 375, would direct population growth to urban communities, or in established rural communities, thereby reducing pressure to convert agricultural land to development.

Findings after Mitigation

If the implementing agency adopts Mitigation Measures 3.2-3 and 3.2-4, impacts to agricultural lands would be reduced because these measures would require that projects be designed to minimize the indirect conversion of farmland to non-agricultural use and would require local jurisdictions to implement growth management strategies to minimize the pressure to convert agriculture lands. With the implementation of these measures, Impact 3.2-5 may be reduced, but not necessarily to a less-than-significant level, because development pressure at the urban interface would still occur. Additionally, SACOG cannot require implementing agencies to adopt this mitigation measure, and it is ultimately the responsibility of a lead agency to determine and adopt project-specific mitigation. Therefore, due to the importance of the region's agricultural resources, impacts on farmland would be significant and unavoidable.

SACOG does not have the authority to require implementing agencies to adopt identified mitigation measures; the mitigation measures are within the responsibility and jurisdiction of another public agency. However, implementation of the measures identified above or other comparable measures identified by the lead agency at a project-level would reduce the potential conversion of agricultural land to non-agricultural uses, and agencies with jurisdiction to adopt these measures can and should do so (PRC Section 21081(a)(1), (2).) Specific economic, legal, social, technological, or other considerations make additional mitigation measures infeasible.

3. Air Quality

Impact 3.3-1: Conflict With or Obstruct Implementation of an Applicable Air Quality Plan

This impact is analyzed for adverse effects of Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 3.3-39 through 3.3-40 of the Draft EIR.

Significance before Mitigation

The 2025 Blueprint accommodates the expected population growth and accompanying demand for transportation in the region through a multi-modal approach. The 2025 Blueprint supports continued reduction in criteria air pollutant emissions from on-road mobile sources. The local air districts also report progress in implementing specific programs intended to reduce criteria emissions from on-road sources. The 2025 Blueprint does not conflict with local air district programs and includes programs and strategies that complement and support the local air district programs. The 2025 Blueprint continues to facilitate local air quality planning efforts as part of the implementation of the applicable air quality plans. As a result, the 2025 Blueprint would not conflict with or obstruct the implementation of any applicable air quality plan for air quality plan attainment. The combined impacts related to the projected land use pattern and planned transportation improvements from implementation of the 2025 Blueprint would be **less than significant**.

The less-than-significant impact determination is confirmed by the Board of Directors based on the evidence and analysis provided in the record.

Impact 3.3-2: Be Inconsistent with Or Exceed Applicable Thresholds of Significance Established by The Local Air District for Long-Term Operational Criteria Air Pollutant Emissions and Short-Term Construction Criteria Air Pollutant Emissions

This impact is analyzed for adverse effects of Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 3.3-40 through 3.3-48 of the Draft EIR.

Significance before Mitigation

Although individual projects under the 2025 Blueprint may not generate significant short-term emissions, it is probable that several projects would be under construction simultaneously, generating combined construction emissions that could impact air quality. Regarding long-term operational emissions, at the regional level, there is the potential for the 2025 Blueprint to be inconsistent with, or exceed, applicable thresholds of significance established by the local air district for long-term operational criteria air pollutant emissions. For these reasons, impacts would be **significant**.

Mitigation

- Implement Mitigation Measure 3.16-1: Implement VMT Reduction Strategies

Mitigation Measure 3.3-1: Require Applicable Design Measures

Implementing agencies shall require projects that exceed the long-term operational thresholds to mitigate the air quality impacts to below such thresholds using applicable and feasible mitigation, as defined by the local air district.

Examples of design measures that would reduce criteria pollutant emissions include, but are not limited to:

- use of energy-efficient lighting and process systems (e.g., low-NO_X water heaters and boiler units);
- design streets to maximize pedestrian access to transit stops;
- include bus shelters at transit access points where deemed appropriate by local public transit operator in large residential, commercial, and industrial projects;
- equip residential structures with electric outlets in the front and rear of the structure to facilitate use of electrical lawn and garden equipment;
- provide for, or contribute to, dedication of land for off-site Class I and Class II bicycle facilities linking the project to designated bicycle commuting routes in accordance with the regional bikeway master plan;
- contribute to the provision of synchronized traffic signals on roadways affected by the project and as deemed necessary by the local public works department;
- provide transit-enhancing infrastructure that includes bus turnouts or bulbs, passenger benches, street lighting, route signs and displays, and shelters as demand and service routes warrant, subject to review and approval by local transportation planning agencies;
- provide pedestrian-enhancing infrastructure that includes sidewalks and pedestrian paths, direct pedestrian connections, street trees to shade sidewalks, pedestrian safety designs and infrastructure, street furniture and artwork, street lighting, pedestrian signalization and signage, and/or access between bus service and major transportation points within the project;
- include neighborhood park(s) or other recreational options, such as trails, within the development to minimize vehicle travel to off-site recreational and/or commercial uses;
- install solar water heaters;
- incorporate mixed uses, where permitted by local development regulations, to achieve a balance of commercial, employment, and housing options on the project site;
- contribute to traffic-flow improvements (e.g., right-of-way, capital improvements) that reduce traffic congestion and do not substantially increase roadway capacity;
- provide preferential parking spaces for carpool and vanpool vehicles, implement parking fees for single-occupancy vehicle commuters, and implement parking cash-out program for employees;
- use clean fuel vehicles in the vehicle fleet;
- require all employment centers to include an adequate number of on-site shower/locker facilities for bicycling and pedestrian commuters (typically one shower and three lockers for every 25 employees per shift);
- construct/contribute to bicycle and pedestrian facility improvements;
- provide ancillary services (e.g., cafeterias, health clubs, automatic tellers, and post offices) within walking distance of proposed development (no further than 1,500 feet) as appropriate and in compliance with local development regulations;
- provide park-and-ride lots as deemed feasible and appropriate by transportation planning agencies;
- employment centers that exceed a designated size, as measured by the number of employees, shall provide on-site child care and after-school facilities or contribute to off-site construction of such facilities within walking distance of employment land uses (for employment centers on or adjacent to industrial land uses, on-site child daycare centers shall be provided only if supported by the findings of a comprehensive health risk assessment (HRA) performed in consultation with the local air district);
- provide on-site pedestrian facility enhancements, such as walkways, benches, proper lighting, vending machines, and building access that are physically separated from parking lot traffic;

- offer alternative work schedules, where practical, that allow for work hours that are compressed into fewer than 5 days (e.g., 9/80, 4/40, or 3/36 schedules), or allow flextime schedules;
- provide transit amenities (e.g., on-site and off-site bus turnouts, passenger benches, or shelters) where deemed appropriate by local transportation planning agencies;
- contribute to the provision of synchronized traffic signals on roadways affected by the proposed project and as deemed necessary by the local public works department;
- provide video conferencing facilities;
- commit to support programs that include guaranteed ride home, subsidized transit passes, and rideshare matching;
- provide transportation (e.g., shuttles) to major transit stations and multimodal centers;
- require each employer employment center (more than 25 employees) to assign a transportation coordinator for the applicable Transportation Management Association (TMA);
- require all employers to install a permanent display in employee common areas of alternate transit information, as determined by the requirements of the TMA;
- require employers or employment centers (more than 25 employees) to implement a guaranteed ride home program;
- require employers or employment centers (more than 25 employees) to implement an incentive program for riding transit, carpooling, vanpooling, biking, and walking instead of driving a single-occupancy vehicle to work, and design and locate buildings to facilitate transit access;
- install Energy Star (or equivalent) cool roofing systems on all buildings;
- design shuttle and transit exits to adjoining streets to reduce time to reenter traffic from the project site;
- increase wall and attic insulation to 20 percent above Title 24 requirements (residential and commercial);
- orient buildings to take advantage of solar heating and natural cooling, and use passive solar designs (residential, commercial, and industrial);
- provide energy-efficient windows (double pane and/or Low-E) and awnings or other shading mechanisms for windows, porches, patios, and walkways;
- include passive solar cooling and heating features in designs, as well as ceiling and whole house fans;
- include programmable thermostats in the design of heating and cooling systems; and
- use day lighting systems, such as skylights, light shelves, and interior transom windows.

See also Chapter 3, "Measures to Reduce GHG Emissions," in CAPCOA's *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity* (CAPCOA Handbook) for additional reduction measures (CAPCOA 2024). Although the CAPCOA Handbook focuses on GHG reduction measures, co-benefits of many measures include criteria pollutant emission reductions. Future project proponents shall use the CAPCOA Handbook to develop measures to reduce emissions to below thresholds if significant impacts are identified.

Mitigation Measure 3.3-2: Require Applicable Construction Measures

Lead agencies shall require project applicants, prior to and during construction, to implement construction mitigation measures that, at a minimum, meet the requirements of the applicable air district with jurisdiction over the area in which construction activity would occur if the project is anticipated to exceed thresholds of significance for short-term criteria air pollutant emissions. Projects that exceed these thresholds shall mitigate the air quality impacts using all applicable and feasible mitigation. For construction activity on the project site that is anticipated to exceed thresholds of significance, the project applicant(s) shall require construction contractors to implement both Standard Mitigation Measures and Best Available Mitigation Measures for Construction Activity to reduce emissions for all construction activity performed in the plan area.

Examples of mitigation measures could include, but not limited to, the following:

- The project proponent or their primary contractor shall implement a Fugitive Dust Control Plan.
- All grading operations on a project shall be suspended when winds exceed 20 mph or when winds carry dust beyond the property line despite implementation of all feasible dust control measures.
- Construction sites shall be watered as directed by the local air district and as necessary to prevent fugitive dust violations.
- An operational water truck shall be on-site at all times. Water shall be applied to control dust as needed to prevent visible emissions violations and off-site dust impacts.
- On-site dirt piles or other stockpiled particulate matter shall be covered, wind breaks installed, and water and/or soil stabilizers employed to reduce wind-blown dust emissions. The use of approved nontoxic soil stabilizers shall be incorporated according to manufacturers' specifications to all inactive construction areas.
- All transfer processes involving a free fall of soil or other particulate matter shall be operated in such a manner as to minimize the free fall distance and fugitive dust emissions.
- Approved chemical soil stabilizers shall be applied according to the manufacturers' specifications to all inactive construction areas (previously graded areas that remain inactive for 96 hours), including unpaved roads and employee/equipment parking areas.
- To prevent track-out, wheel washers shall be installed where project vehicles and/or equipment exit onto paved streets from unpaved roads. Vehicles and/or equipment shall be washed before each trip. Alternatively, a gravel bed may be installed as appropriate at vehicle/equipment site exit points to effectively remove soil buildup on tires and tracks and prevent/diminish track-out.
- Paved streets shall be swept frequently (water sweeper with reclaimed water recommended; wet broom permitted) if soil material has been carried onto adjacent paved, public thoroughfares from the project site.
- Temporary traffic control shall be provided as needed during all phases of construction to improve traffic flow, as deemed appropriate by the applicable department of public works and/or California Department of Transportation (Caltrans), and to reduce vehicle dust emissions. An effective measure is to enforce vehicle traffic speeds at or below 15 mph.
- Traffic speeds on all unpaved surfaces shall be reduced to 15 mph or less, and unnecessary vehicle traffic shall be reduced by restricting access. Appropriate training for truck and equipment drivers, on-site enforcement, and signage shall be provided.
- Ground cover shall be reestablished on the construction site as soon as possible and before final occupancy through seeding and watering.
- Open burning shall be prohibited at the project site. No open burning of vegetative waste (natural plant growth wastes) or other legal or illegal burn materials (e.g., trash, demolition debris) may be conducted at the project site. Vegetative waste shall be chipped or delivered to waste-to-energy facilities (permitted biomass facilities), mulched, composted, or used for firewood. It is unlawful to haul waste materials off-site for disposal by open burning.
- The primary contractor shall be responsible for ensuring that all construction equipment is properly tuned and maintained before and for the duration of on-site operation.
- Existing power sources (e.g., power poles) or clean-fuel generators shall be used rather than temporary power generators.
- A traffic plan shall be developed to minimize traffic flow interference from construction activities. The plan may include advance public notice of routing, use of public transportation, and satellite parking areas with a shuttle service. Operations that affect traffic shall be scheduled for off-peak hours. Obstruction of through-traffic lanes shall be minimized. A flag person shall be provided to guide traffic properly and ensure safety at construction sites.

- The project proponent or their primary contractor shall assemble a comprehensive initial inventory (i.e., make, model, engine year, horsepower, emission rates) of all heavy-duty off-road (portable and mobile) equipment (50 horsepower and greater) that would be used an aggregate of 40 or more hours for the construction project and provide a plan for approval by the local air district demonstrating that the heavy-duty (equal to or greater than 50 horsepower) off-road equipment to be used for construction, including owned, leased, and subcontractor vehicles, shall achieve a project-wide fleet-average 10 percent NO_X reduction compared to the most recent CARB fleet average at the time of construction. These equipment emission reductions can be demonstrated using the most recent version of the Construction Mitigation Calculator developed by the SMAQMD. Acceptable options for reducing emissions may include use of late-model engines, low-emission diesel products, alternative fuels, engine retrofit technology (Carl Moyer Guidelines), after-treatment products, voluntary off-site mitigation projects, the provision of funds for air district off-site mitigation projects, and/or other options as they become available. In addition, implementation of these measures would also result in a 5 percent reduction in ROG emissions from heavy-duty diesel equipment. The local air district shall be contacted to discuss alternative measures.

Findings after Mitigation

Mitigation Measure 3.3-1 provides multiple methods to reduce operational emissions. Mitigation Measure 3.3-2 also provides multiple emissions reduction methods, specifically focused on reducing construction-related pollutants. At the plan level, the effectiveness of these measures in reducing potential impacts to a less-than-significant level for individual projects that would occur under the 2025 Blueprint cannot be guaranteed, as the possibility remains for projects, despite implementing all feasible mitigation measures, to result in emissions above local thresholds of significance. Project-level environmental analysis would be required to ensure that the mitigation measures above would reduce impacts to a less-than-significant level for individual projects.

Projects taking advantage of CEQA Streamlining provisions of SB 375 (PRC Sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measure described above to address site-specific conditions, resulting in impacts that are less than significant. However, SACOG cannot require the implementing agency to adopt these mitigation measures, and it is ultimately the responsibility of a lead agency to determine and adopt project-specific mitigation. Therefore, it is conservatively assumed that construction– and operations-related emissions would exceed an applied threshold of significance related to exposure to emissions and could cause adverse health outcomes.

This impact would be significant and unavoidable for purposes of this program-level review because SACOG does not have authority to require the implementing agencies to adopt the identified mitigation measures; the mitigation measures are within the responsibility and jurisdiction of another public agency. However, implementation of the measures identified above or other comparable measures identified by the lead agency at a project-level would reduce impacts related to criteria pollutant emissions and agencies with jurisdiction to adopt these measures can and should do so (PRC Section 21081(a)(1), (2).) Moreover, specific economic, legal, social, technological, or other considerations, make identification of additional mitigation measures infeasible at the plan level.

Impact 3.3-3: Expose Sensitive Receptors to Substantial TAC Concentrations, Including Those from Construction and Operational Emissions

This impact is analyzed for adverse effects of Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 3.3-48 through 3.3-59 of the Draft EIR.

Significance before Mitigation

Regional growth and land use change as well as transportation network improvements under the 2025 Blueprint could result in exposure of sensitive receptors to construction-related TACs. Because individual project details such as the timing, duration, magnitude of construction activities; as well as other details such as haul truck routes, and types of equipment are unknown at this level of analysis, a project-specific HRA cannot be conducted. Therefore, it is assumed that future construction activities related to regional growth and land use change, as well as transportation network improvements proposed under the 2025 Blueprint, could generate TACs exceeding local thresholds for cancer risk.

Regarding operational activities related to regional growth and land use change, exact future locations of new sensitive receptors cannot be known at this time and it is therefore assumed that regional growth and land use changes under the 2025 Blueprint would result in new sensitive receptors within the distance buffers identified by CARB to TAC sources and that new stationary and non-stationary sources of TACs to be sited near sensitive receptors throughout the region, potentially resulting in exposure to substantial TAC concentrations.

Regarding operational activities related to the transportation network, the site-specific TAC source conditions and the sensitive receptor conditions are unknown at this time. While improvements to existing facilities may be beneficial on a regional scale, these improvements also have the potential to increase the amount of locally generated TAC emissions in an area where the transportation infrastructure capacity is increased. Thus, operations of transportation network improvements have the potential to expose sensitive receptors to substantial TAC concentrations. For these reasons, impacts related to TACs would be **significant.** (Draft EIR pages 3.3-56 and 3.3-57)

Mitigation

- Implement Mitigation Measure 3.3-2: Require Applicable Construction Measures

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

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

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

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

Mitigation Measure 3.3-4: Implement the Strategies Contained in the CARB Technical Advisory

The implementing agency shall implement the strategies identified in the CARB Technical Advisory to reduce air pollution exposure near high-volume roadways to less-than-significant levels, where feasible. Examples of effective strategies include (CARB 2017):

- use of speed reduction mechanisms such as roundabouts to reduce the frequency of stop-and-go driving common among streets that support stop signs;
- use of traffic signal management to limit the frequency of stop-and-go driving and vehicle idling;
- enforcement and establishment of speed limit reductions of high-speed roadways;
- use of design elements that promote air flow and pollutant dispersion along street corridors to optimize air flow, building downwash, and pollution dispersal;
- incorporate bike lanes and sidewalks to promote alternative, zero-pollution modes of transportation; and
- construct solid barriers directly adjacent to high-volume roadways such as sound walls to improve downwash.

Mitigation Measure 3.3-5: Require Construction Health Risk Assessment

A site-specific HRA shall be required for all construction projects anticipated to last more than six months and located within 1,000 feet of sensitive receptors (as defined in California Health and Safety Code Section 42705.5[a][5]) regardless of intensity of construction. All recommendations from the HRA shall be enforced as conditions of approval of the development and the implementing agency shall require implementation of all feasible measures to reduce impacts to a less than significant level.

Findings after Mitigation

Due to uncertainty in individual project conditions (e.g., location of receptor in relation to source [upwind versus downwind], the effectiveness of filtering systems depending on the TACs present) the extent to which this measure would reduce emissions is unknown at this time. Construction is a substantial source of TACs (e.g., DPM exhaust, NOA), although standard construction mitigation measures eliminate, avoid, or minimize the risk of adverse health effects from exposure from TACs. Thus, Mitigation Measure 3.3-2 is required to minimize potential construction-related TACs. There is also a possibility that individual projects, despite implementing all feasible measures recommended in a site-specific HRA, to continue to result TAC emissions and health risks above local thresholds of significance. In addition, lead agencies can only require preparation of HRAs through mitigation where there is reason to presume that the project would create or exacerbate impacts associated with TACs. Where no such evidence exists, this element of the mitigation measure may not be enforceable, although approval of the project may still be conditioned on a similar requirement. For projects proposing to streamline environmental review, where the project would either create or exacerbate impacts associated with TACs, lead agencies must conduct project-level analysis for each project to analyze whether, based on substantial evidence in the record, the proposed mitigation would reduce the impact to less than significant.

If an implementing agency adopts these mitigation measures, Impact 3.3-3 may be reduced. However, at the plan level, the effectiveness of these measures in reducing potential impacts to a less-than-significant level for individual projects that would occur under the 2025 Blueprint cannot be guaranteed. Therefore, this impact would be significant and unavoidable. SACOG does not have authority to require the implementing agencies to adopt the identified mitigation measures; the mitigation measures are within the responsibility and jurisdiction of another public agency. However, implementation of the identified measures or other comparable measures identified by the lead agency at a project-level would reduce the impacts from potential exposure of sensitive receptors to substantial TAC concentrations and agencies with jurisdiction to adopt these measures can and should do so (PRC Section 21081(a)(1), (2).) Moreover, specific economic, legal, social, technological, or other considerations, make identification of additional mitigation measures infeasible at the plan level.

Impact 3.3-4: Result in Other Emissions (Such as Those Leading to Odors) Adversely Affecting a Substantial Number of People

This impact is analyzed for adverse effects of Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 3.3-59 through 3.3-62 of the Draft EIR.

Significance before Mitigation

Given the temporary nature of construction activities and the dispersion properties of diesel PM, construction related to regional growth and land use change projects as well as transportation network improvement projects under the 2025 Blueprint are not anticipated to result in an odor-related impact during construction. Operation of transportation infrastructure projects may result in odorous diesel PM emissions, however these odors dissipate quickly and have a small dispersion area. Additionally, diesel PM is not considered to be a major odor source and thus not considered to be a public nuisance.

Regarding operation of the proposed 2025 Blueprint land use growth pattern, operation-related activities at facilities such as composting or recycling operations, manufacturing, painting/coating operations (e.g., auto body shops), and coffee roasters could generate odors, exposing existing sensitive receptors that are not currently affected. Specific uses are not known at this level of analysis, and detailed site and grading plans have not yet been developed. Thus, new facilities could result in the exposure of existing sensitive receptors to odor sources. Implementation of the 2025 Blueprint could also result in the development of new sensitive receptors near existing odor sources. This impact would be **significant**. (Draft EIR page 3.3-61)

Mitigation

Mitigation Measure 3.3-6: Require Applicable Local Air District Measures and Best Practices Related to Odors

Implementing agencies shall require assessment of new and existing odor sources for individual non-agricultural land use projects to determine whether sensitive receptors would be exposed to objectionable odors and apply recommended applicable mitigation measures as defined by the applicable local air district and best practices.

Examples of mitigation measures that may be applied where feasible and necessary to address site-specific impacts, include but are not limited to:

- Proposed industrial, commercial, or convenience land uses (e.g., fast-food restaurants, painting operations) that have the potential to emit objectionable odors shall be located as far away as feasibly possible from existing and proposed sensitive receptors and oriented where possible to place buildings or other obstructions between the odor source and downwind receptors.
- The odor-producing potential of land uses shall be considered when the type of facility that would occupy industrial, commercial, or convenience areas is considered.
- If an odor-emitting facility is to occupy space in the industrial, commercial, or convenience area, the odor-producing potential of the source and potential control devices shall be determined in coordination with the local air district and shall be based on the number of complaints associated with existing sources of the same nature. Odor-control devices (e.g., wet chemical scrubbers, HVAC filters, activated carbon scrubbers, biologically active filters, enclosures) shall be identified in the improvement plans before the approval of building permits. The odor-control devices shall be installed before the issuance of certificates of occupancy for the potentially odor-producing use.
- Require notification to incoming property owners (e.g., real estate disclosures) regarding the existence of pre-existing odor-emitting facilities or operations (e.g., similar to avigation easements for noise).

Also, see specifically SMAQMD's Guide to Air Quality Assessment in Sacramento County, which.an extensive list of technology- and design-based odor reduction measures in its Technology- and Design-Based Odor Reduction Measures appendix.

Findings after Mitigation

While Mitigation Measure 3.3-6 would not eliminate sources of odor, it would aid in reducing exposure to odors as a result of implementation of the 2025 Blueprint and ensure disclosure of pre-existing conditions. If an implementing agency adopts Mitigation Measure 3.3-6, the impact would be reduced to less than significant. Projects under the 2025 Blueprint taking advantage of CEQA Streamlining provisions of SB 375 (PRC Sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measure described above to address site-specific conditions, resulting in impacts that are less than significant. However, SACOG cannot require the implementing agency to adopt these mitigation measures, and it is ultimately the responsibility of a lead agency to determine and adopt project-specific mitigation.

Therefore, this impact would be significant and unavoidable for purposes of this program-level review because SACOG does not have authority to require the implementing agencies to adopt the identified mitigation measures. The mitigation measure is within the responsibility and jurisdiction of another public agency. because implementation of the mitigation measure above or other comparable measure identified by the lead agency at a project-level would reduce the impacts from objectionable odors with the potential to affect a substantial number of people, and agencies with jurisdiction to adopt these measures can and should do so (PRC Section 21081(a)(1), (2).

4. Biological Resources

Impact 3.4-1: Have a Substantial Adverse Effect, Either Directly or Through Habitat Modification, on Any Species Identified as a Candidate, Sensitive, or Special-Status in Local or Regional Plans, Policies, or Regulations by CDFW OR USFWS

This impact is analyzed for adverse effects of Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 3.4-31 through 3.4-52 of the Draft EIR.

Significance before Mitigation

Implementation of the Development Pattern and planned transportation network improvements and programs in the 2025 Blueprint at the regional level would result in conversion of habitats that support or have the potential to contain special-status plants and wildlife. This may result in a substantial adverse effect on special-status species identified by the California Department of Fish and Wildlife (CDFW) or US Fish and Wildlife Service (USFWS). Impact 3.4-1 would be **potentially significant**.

Mitigation

Mitigation Measure 3.4-1: Conduct a Biological Resources Assessment

Prior to initiation of construction or other ground disturbing activities the implementing agency will conduct, or require an applicant to conduct, a preliminary biological analysis for the project site that will include review of Section 3.4.2, "Environmental Setting," Appendix C-2, Appendix C-3, and any relevant HCP, NCCP, CARP, or ILF Program as well as current queries of CNDDB, CNPS Inventory, and USFWS IPaC, and a reconnaissance-level survey of the project site. If it is determined during the preliminary biological analysis that the project may have adverse impacts on habitats that could support special-status species or other sensitive biological resources (e.g., wetlands, nursery sites, sensitive natural communities) and these habitats cannot be avoided, the implementing agency will require a qualified biologist to conduct project specific land cover and habitat mapping (including delineation of aquatic resources if any are present), and a habitat assessment of the area of impact to identify whether any special-status plant or wildlife species habitat, sensitive natural communities, riparian habitat, or other sensitive habitats, wetlands, wildlife movement corridors, or wildlife nursery sites could be affected by construction activities. If it is determined during the preliminary biological analysis that sensitive natural communities have potential to occur in the project impact area, the implementing agency will identify and map on-site vegetation to the alliance level following standards described in the most current edition of *A Manual of California Vegetation* (including updated natural communities data at http://vegetation.cnps.org/). Additionally, the biologist will determine whether any local policies or ordinances intended to protect biological resources (e.g., tree removal policies) would apply, and whether construction activities would result in conflicts with these policies or ordinances. The data reviewed will include the Biological Resources setting of this Draft EIR (see Section 3.4.2, "Environmental Setting"), and the best available current data for the area, including vegetation mapping data, species distribution information, CNDDB, CNPS Inventory of Rare and Endangered Plants of California, and relevant general plans, HCPs, and NCCPs. The biological resources assessment will be completed at a time of year that is appropriate for identifying habitat and no more than 1 year prior to initiation of construction activities. A qualified biologist will:

- hold a wildlife biology, botany, ecology, forestry, or other relevant degree from an accredited university,
- be knowledgeable in relevant species life histories and ecology,
- be able to correctly identify relevant species and habitats,
- be knowledgeable about survey protocols,
- be knowledgeable about state and federal laws regarding the protection of special-status species, and
- have experience with CDFW's CNDDB and Biogeographic Information and Observation System (BIOS).

If the qualified biologist determines that the land within and in the vicinity of the area of impact does not contain habitat potentially suitable for special-status plant or wildlife species, sensitive natural communities, riparian habitat, or other sensitive habitats, wetlands, wildlife movement corridors, or native wildlife nursery sites, construction activities would not result in adverse effects on these resources and project implementation would not result in conflict with a local policy or ordinance or an adopted HCP or NCCP. The biologist will document these findings in a letter report to the implementing agency, and no further mitigation is required.

Mitigation Measure 3.4-2: Identify Special-Status Plant Species, and Avoid, Minimize, and Mitigate Impacts

If the qualified biologist, after implementation of Mitigation Measure 3.4-1, determines that habitat potentially suitable for special-status plants is present within the area of impact and could be adversely affected by construction activities, then the following measures will be implemented:

- Eleven special-status plant species (one of which constitutes two subspecies) are covered under adopted HCPs or NCCPs within the plan area (Natomas Basin HCP, South Sacramento HCP, Western Placer County HCP/NCCP, and Yolo HCP/NCCP; Appendix C-2). If a project is within the plan area of an adopted HCP or NCCP, and the project qualifies as a covered activity under the HCP or NCCP, then the implementing agency may seek coverage under the plan. If permitting through an adopted HCP or NCCP is pursued, the implementing agency will be required to meet the permit conditions and other requirements established in the plan's Implementing Agreement, which often includes (depending on the plan) submitting a complete application package, paying required fees, fulfilling any appropriate survey requirements, and complying with all applicable conservation measures.
- For projects that are not within the plan area of an adopted HCP or NCCP or if special-status plant species that are not covered under an adopted HCP or NCCP may be present within the area of impact, the following measures will apply:
    - Prior to project initiation and during the blooming period for special-status plant species with potential to occur in the area of impact, a qualified botanist will conduct protocol-level surveys for special-status plants in accordance with *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (CDFW 2018 or current version). A qualified botanist will:
        - be knowledgeable about plant taxonomy,
        - be familiar with plants of the region, including special-status plants and sensitive natural communities,
        - have experience conducting floristic botanical field surveys as described in the CDFW *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities*,
        - be familiar with *The Manual of California Vegetation* (Sawyer et al. 2009 or current version, including updated natural communities data at http://vegetation.cnps.org/), and
        - be familiar with federal, state, and local statutes and regulations related to plants and plant collecting.

- If no special-status plants are found during the protocol-level survey, the botanist will document the findings in a letter report to USFWS or CDFW, as appropriate depending on species status, and the implementing agency and no further mitigation will be required.
- If special-status plant species are found that cannot be avoided during construction, the implementing agency will consult with CDFW or USFWS to determine the appropriate mitigation measures for direct and indirect impacts that could occur as a result of project construction. The implementing agency will implement the agreed-upon mitigation measures to compensate for the loss of occupied habitat or individuals. Mitigation measures may include preserving and enhancing existing populations, creation of off-site populations on project mitigation sites through seed collection or transplantation, and/or restoring occupied habitat in sufficient quantities to offset the loss of occupied habitat and/or individuals.

Mitigation Measure 3.4-3: Identify Special-Status Wildlife and Avoid, Minimize, and Mitigate Impacts

If the qualified biologist, after implementation of Mitigation Measure 3.4-1, determines that habitat potentially suitable for special-status wildlife is present within the area of impact and could be adversely affected by construction activities, then the following measures will be implemented:

- Thirty- two special-status wildlife species are covered under adopted HCPs or NCCPs within the plan area (Natomas Basin HCP, South Sacramento HCP, Western Placer County HCP/NCCP, and Yolo HCP/NCCP; Appendix C-2). If a project is within the plan area of an adopted HCP or NCCP, and the project qualifies as a covered activity under the HCP or NCCP, then the implementing agency may seek coverage under the plan. If permitting through an adopted HCP or NCCP is pursued, the implementing agency will be required to meet the permit conditions and other requirements established in the plan's Implementing Agreement, which often includes (depending on the plan) submitting a complete application package, paying required fees, fulfilling any appropriate survey requirements, and complying with all applicable conservation measures.
- For projects that are not within the plan area of an adopted HCP or NCCP or if special-status wildlife species that are not covered under an adopted HCP or NCCP may be present within the area of impact due to the presence of habitat potentially suitable for the species, protocol-level surveys (where applicable), preconstruction surveys, and avoidance and minimization measures will be required. Surveys will be conducted by a qualified biologist with the proper handling permits, as applicable. Acceptable species-specific survey procedures will be developed in consultation with CDFW or USFWS, as appropriate depending on species status. Alternatively, if habitat potentially suitable for the special-status species is determined to be present within the area of impact, presence of special-status species may be assumed instead of confirmed with surveys. Consultation with CDFW, USFWS, and/or NOAA Fisheries may also be required, depending on the type of impact and the species involved. Refer to the Avoidance and Minimization Measures below for each special-status wildlife species with potential to occur in the plan area and apply to the project as applicable and feasible.

<u>Avoidance and Minimization Measures</u>

California Red-Legged Frog

- If habitat potentially suitable for California red-legged frog is determined to be present within or in the vicinity of the area of impact, the implementing agency will retain a USFWS-approved biologist to conduct a pre-construction survey for California red-legged frog within the area of impact, which will be conducted in accordance with the *Revised Guidance on Site Assessments and Field Surveys for the California Red-legged Frog* (USFWS 2005) protocol no more than one year prior to the commencement of project construction activities. Consultation with USFWS should be conducted as soon as possible during the early planning stages of an individual project.
- If no California red-legged frogs are found, further mitigation will not be required.
- If California red-legged frog adults, tadpoles, or eggs are found, the biologist will contact USFWS and CDFW to determine whether relocating the species is appropriate. If the agencies approve of relocation, a USFWS-approved biologist will be allowed sufficient time to move the species from the work site before work activities begin.

- The biologist will conduct environmental awareness training for all construction personnel on required avoidance procedures and protocols if a California red-legged frog enters an active construction zone.
- To the extent practicable, construction will not occur during the wet season, when California red-legged frogs are more likely to disperse through upland habitats. Work within all waters, wetlands, and the riparian corridor will be limited to the period from April 15 to October 15, except for vegetation clearing.
- For work conducted during the California red-legged frog migration season (November 1 through May 31), the following will apply:
  - Flagging will be placed around the area of impact during ground-disturbing activities after hand excavation of burrows has been completed. Flagging will also be placed around all spoils and stockpiles. No project activities will occur in the flagged area. A qualified biologist will visit the site weekly to ensure that the flagging is in good working condition. Flagging design will be subject to the approval of USFWS. If flagging is not used, a qualified biological monitor will be on-site during all ground disturbance activities.
  - A qualified biologist will survey the area of impact (including access roads) in mornings following measurable precipitation events. Construction may commence once the biologist has confirmed that no California red-legged frogs are in the work area.
- Each day that work is conducted, the following will apply:
  - Prior to beginning work each day, underneath equipment and stored pipes greater than 1.2 inches in diameter will be inspected for California red-legged frogs. If any are found, they will be allowed to move out of the construction area.
  - Trenches and holes within the area of impact will be covered and inspected daily for stranded individuals. Trenches and holes deeper than 1 foot will contain escape ramps (maximum slope of 2:1) to allow trapped individuals to escape uncovered holes or trenches. Holes and trenches will be inspected prior to filling.
  - All food and food-related trash will be enclosed in sealed trash containers at the end of each workday and removed completely from the area of impact once every three days to avoid attracting wildlife.
  - A speed limit of 15 mph will be maintained on dirt roads.
  - All equipment will be maintained such that there are no leaks of automotive fluids such as fuels, oils, and solvents. Any fuel or oil leaks will be cleaned up immediately and disposed of properly.
  - Plastic monofilament netting (erosion control matting) or similar material will not be used within the area of impact because California red-legged frogs may become entangled or trapped. Acceptable substitutes include coconut coir matting or tackified hydroseeding compounds.
  - Hazardous materials (e.g., such as fuels, oils, solvents) will be stored in sealable containers in a designated location that is at least 100 feet from aquatic habitat. If it is not feasible to store hazardous materials 100 feet from wetlands and river and stream channels, then spill containment measures will be implemented to prevent the possibility of accidental discharges to wetlands and waters.
- Prior to commencement of ground-disturbing activities (including vegetation disturbance activities) that would result in permanent loss of habitat for California red-legged frog, the implementing agency will implement the following measures to compensate for loss of California red-legged frog habitat:
  - The implementing agency will provide suitable in-kind habitat that will be created, restored, and/or set aside in perpetuity at a ratio of 3:1. Alternatively, credits will be purchased at a USFWS-approved conservation bank. Compensation plans will be subject to review and approval by USFWS.
  - In-kind habitat compensation will occur prior to the initiation of ground or vegetation disturbance activities. Aquatic habitat will be provided for damage or loss of aquatic habitat and upland habitat will be provided for damage or loss of upland habitat. Compensation will be accomplished through the following options: 1) acquire land, by itself, or possibly in conjunction with a conservation organization, State park, State Wildlife

Area, National Wildlife Refuge, or local regional park that provides occupied habitat; 2) purchase the appropriate credit units at a USFWS-approved conservation bank; 3) restore habitat to support California red-legged frog; or 4) other method as determined by USFWS

- If the final rule regarding the interpretation of the definition of take (Federal Register Vol. 90 No. 73, USFWS 2025) is approved and published prior to implementation of projects under the 2025 Blueprint EIR, instead of being required to follow the mitigation measures listed above, the project proponent will comply with the legal requirements of ESA as amended by the final rule and will provide mitigation as directed by USFWS or NOAA Fisheries (which could include the above, if directed).

California Tiger Salamander

- If habitat potentially suitable for California tiger salamander is determined to be present within or in the vicinity of the area of impact, the implementing agency will retain a USFWS-approved biologist to conduct a pre-construction survey for California tiger salamander within the area of impact, which will be conducted in accordance with the Interim Guidance on Site Assessment and Field Surveys for Determining Presence or a Negative Finding of the California Tiger Salamander (USFWS and CDFG 2003) protocol no more than one year prior to the commencement of project construction activities. Consultation with USFWS and CDFW should be conducted as soon as possible during the early planning stages of an individual project.
- If California tiger salamander is found during surveys:
  - When feasible, a 50-foot no-disturbance buffer will be constructed around burrows that provide suitable upland habitat for California tiger salamander. Burrows considered suitable for California tiger salamander will be determined by the USFWS-approved qualified biologist.
  - All suitable burrows directly affected by construction will be hand excavated under the supervision of a qualified wildlife biologist. If California tiger salamanders are found, the biologist will relocate individuals to the nearest burrow that is outside of the area of impact.
  - The biologist will conduct environmental awareness training for all construction personnel on required avoidance procedures and protocols if a California tiger salamander enters an active construction zone.
  - For work conducted during the California tiger salamander migration season (November 1 to May 31):
    - Flagging will be placed around the area of impact during ground-disturbing activities after hand excavation of burrows has been completed. Flagging will also be placed around all spoils and stockpiles. No project activities will occur in the flagged area. A qualified biologist will visit the site weekly to ensure that the flagging is properly placed. Flagging design will be subject to the approval of USFWS. If flagging is not used, a qualified biological monitor will be on-site during all ground disturbance activities.
    - A qualified biologist will survey the area of impact (including access roads) in mornings following measurable precipitation events. Construction may commence once the biologist has confirmed that no California tiger salamanders are in the work area.
  - Each day that work is conducted, the following will apply:
    - Prior to beginning work each day, underneath equipment and stored pipes greater than 1.2 inches in diameter will be inspected for California tiger salamander. If any are found, they will be allowed to move out of the construction area.
    - Trenches and holes within the area of impact will be covered and inspected daily for stranded individuals. Trenches and holes deeper than 1 foot will contain escape ramps (maximum slope of 2:1) to allow trapped individuals to escape uncovered holes or trenches. Holes and trenches will be inspected prior to filling.
    - All food and food-related trash will be enclosed in sealed trash containers at the end of each workday and removed completely from the area of impact once every three days to avoid attracting wildlife.

- A speed limit of 15 mph will be maintained on dirt roads.
- All equipment will be maintained such that there are no leaks of automotive fluids such as fuels, oils, and solvents. Any fuel or oil leaks will be cleaned up immediately and disposed of properly.
- Plastic monofilament netting (erosion control matting) or similar material will not be used within the area of impact because California tiger salamander may become entangled or trapped. Acceptable substitutes include coconut coir matting or tackified hydroseeding compounds.
- Hazardous materials (e.g., fuels, oils, solvents) will be stored in sealable containers in a designated location that is at least 100 feet from aquatic habitat. If it is not feasible to store hazardous materials 100 feet from wetlands and river and stream channels, then spill containment measures will be implemented to prevent the possibility of accidental discharges to wetlands and waters.

- Prior to commencement of ground-disturbing activities (including vegetation disturbance activities) that would result in permanent loss of habitat for California tiger salamander, the implementing agency will implement the following measures to compensate for loss of California tiger salamander habitat:
  - The implementing agency will provide suitable in-kind habitat that will be created, restored, and/or set aside in perpetuity at a ratio of 3:1. Alternatively, credits will be purchased at a USFWS-approved conservation bank. Compensation plans will be subject to review and approval by USFWS.
  - In-kind habitat compensation will occur prior to initiation of ground or vegetation disturbance activities. Aquatic habitat will be provided for damage or loss of aquatic habitat and upland habitat will be provided for damage or loss of upland habitat. Compensation will be accomplished through the following options: 1) acquire land, by itself, or possibly in conjunction with a conservation organization, State park, State Wildlife Area, National Wildlife Refuge, or local regional park that provides occupied habitat; 2) purchase the appropriate credit units at a USFWS-approved conservation bank; 3) restore habitat to support the Central California tiger salamander; or 4) other method as determined by USFWS.

- If the final rule regarding the interpretation of the definition of take (Federal Register Vol. 90 No. 73, USFWS 2025) is approved and published prior to implementation of projects under the 2025 Blueprint EIR, instead of being required to follow the mitigation measures listed above, the project proponent will comply with the legal requirements of ESA as amended by the final rule and will provide mitigation as directed by USFWS or NOAA Fisheries (which could include the above, if directed).

Sierra Nevada Yellow-Legged Frog, Foothill Yellow-Legged Frog, Northern Leopard Frog, Southern Long-Toed Salamander, Western Spadefoot, and Yosemite Toad

- If habitat potentially suitable for other special-status amphibians is determined to be present within or in the vicinity of the area of impact, the implementing agency will retain a qualified biologist familiar with the life cycle of special-status amphibians with potential to occur in the area of impact (e.g., Sierra Nevada yellow-legged frog, foothill yellow-legged frog, northern leopard frog, southern long-toed salamander, western spadefoot, Yosemite toad) to conduct a pre-construction survey prior to commencement of construction activities, including land clearing, within the area of impact and a 400-foot buffer around the area of impact. Surveys will consist of "walk and turn" surveys of areas beneath surface objects (e.g., rocks, leaf litter, moss mats, coarse woody debris) for salamanders and visual searches for frogs within upland and aquatic habitat. Surveys will be conducted within the appropriate season to maximize potential for observation for each species, and appropriate surveys will be conducted for the applicable life stages (i.e., eggs, larvae, adults).
- If no special-status amphibians are found, then no further mitigation will be required.
- If special-status amphibians are found during the protocol-level survey, then the implementing agency will consult with CDFW or USFWS, as appropriate. Mitigation measures will be approved by CDFW or USFWS and may include relocating individuals, placement of flagging for avoidance, and construction monitoring by a qualified biologist. No project activities will occur in the flagged area. The implementing agency will implement the agreed-upon mitigation measures to offset the loss of occupied habitat or individuals.

- A qualified biologist will be present during the grubbing and clearing activities in riparian and aquatic habitats in the area of impact.
- For projects that include water work, egg and tadpole surveys will be conducted. If Sierra Nevada yellow-legged frog, foothill yellow-legged frog, or Yosemite toad eggs or tadpoles are identified in the work area, or within 250 feet downstream of the work area, work will stop, USFWS and CDFW will be notified to determine appropriate measures to avoid take of the species before work resumes, and water quality will be monitored so that the activity does not directly or indirectly harm eggs or tadpoles.
- If western spadefoot, which is currently proposed for listing, is listed under ESA by the time of implementation, the project proponent will implement the above measures in consultation with and with approval from USFWS.
- For federally listed species, if the final rule regarding the interpretation of the definition of take (Federal Register Vol. 90 No. 73, USFWS 2025) is approved and published prior to implementation of projects under the 2025 Blueprint EIR, instead of being required to follow the mitigation measures listed above, the project proponent will comply with the legal requirements of ESA as amended by the final rule and will provide mitigation as directed by USFWS or NOAA Fisheries (which could include the above, if directed).

Giant Garter Snake

- If habitat potentially suitable for giant garter snake is determined to be present within or in the vicinity of the area of impact, the implementing agency will retain a qualified biologist to conduct a field investigation to delineate giant garter snake aquatic habitat within the area of impact and adjacent areas within 300 feet of the area of impact. Giant garter snake aquatic habitat includes agricultural ditches. Consultation with USFWS and CDFW should be conducted as soon as possible during the early planning stages of an individual project.
- The qualified biologist will conduct environmental awareness training for all construction personnel working on the project site on required avoidance procedures and protocols to implement if a giant garter snake enters an active construction zone.
- All construction activities within giant garter snake aquatic and upland habitat in and around the site will be conducted between May 1 and September 15, the active period for giant garter snakes. This would reduce direct impacts on the species because the snakes would be active and respond to construction activities by moving out of the way.
- If construction activities occur in giant garter snake aquatic habitat, aquatic habitat will be dewatered and then remain dry and absent of aquatic prey (e.g., fish and tadpoles) for 15 days prior to initiation of construction activities. If complete dewatering is not possible, the implementing agency will consult with CDFW and USFWS to determine what additional measures may be necessary to minimize effects to giant garter snake. After aquatic habitat has been dewatered 15 days prior to construction activities, flagging will be placed a minimum of 300 feet into adjacent uplands to isolate both the aquatic and adjacent upland habitat and the area will be avoided (i.e., no project activities will occur in the flagged area). In addition, high-visibility flagging will be erected to identify the construction limits and to protect adjacent habitat from encroachment of personnel and equipment, which will include all other giant garter snake habitat not described above, and the flagged area will be avoided by all construction personnel. The flagging and work area will be inspected by the approved biologist to ensure that fencing is intact and no snakes have entered the work area before the start of each workday. The flagging will be maintained by the contractor until completion of the project.
- Each day that work is conducted, the following will apply:
  - During construction, an approved biologist experienced with giant garter snake identification and behavior will be on-site daily when construction activities within aquatic habitat or within 300 feet of aquatic habitat are taking place. The biologist will inspect the project site daily for giant garter snakes prior to that day's start of construction activities.
  - If a giant garter snake is observed, the biologist will notify CDFW and USFWS immediately. Construction activities will be suspended in a 100-foot radius of the garter snake until the snake leaves the site on its own.

If necessary, the biologist will consult with CDFW and USFWS regarding appropriate procedures for relocation. If the individual is handled, a report will be submitted, including date(s), location(s), habitat description, and any corrective measures taken to protect giant garter snake within 1 business day to CDFW and USFWS. The biologist will report any take of listed species to USFWS immediately. Any worker who inadvertently injures or kills a giant garter snake or who finds one dead, injured, or entrapped must immediately report the incident to the approved biologist.

- All excavated steep-walled holes and trenches more than 6 inches deep will be covered with plywood (or similar material) or provided with one or more escape ramps constructed of earth fill or wooden planks at the end of each workday or 30 minutes prior to sunset, whichever occurs first. All steep-walled holes and trenches will be inspected by the approved biologist each morning to ensure that no wildlife has become entrapped. All construction pipes, culverts, similar structures, construction equipment, and construction debris left overnight within habitat suitable for giant garter snake will be inspected for giant garter snake by the approved biologist prior to being moved.
- If erosion control is implemented within the area of impact, non-entangling erosion control material will be used to reduce the potential for entrapment. Tightly woven fiber netting (mesh size less than 0.25 inch) or similar material will be used to ensure snakes are not trapped (no monofilament). Coconut coir matting and fiber rolls containing burlap are examples of acceptable erosion control materials.

- The applicant will ensure that there is no-net-loss of giant garter snake habitat by compensating for loss of habitat at a ratio of 1:1, by purchasing credits from a USFWS-approved conservation bank.
- If the final rule regarding the interpretation of the definition of take (Federal Register Vol. 90 No. 73, USFWS 2025) is approved and published prior to implementation of projects under the 2025 Blueprint EIR, instead of being required to follow the mitigation measures listed above, the project proponent will comply with the legal requirements of ESA as amended by the final rule and will provide mitigation as directed by USFWS or NOAA Fisheries (which could include the above, if directed).

Northwestern Pond Turtle

- If habitat potentially suitable for northwestern pond turtle is identified within or in the vicinity of the area of impact, the implementing agency will retain a qualified biologist familiar with the species to conduct a preconstruction survey in the area of impact 24 hours before initiation of ground-disturbing construction activities in habitat potentially suitable for the species. Surveys for northwestern pond turtle will be conducted throughout the area of impact and within approximately 1,500 feet of suitable aquatic habitat within or adjacent to the area of impact.
- If no northwestern pond turtles are found, then further mitigation will not be required.
- If northwestern pond turtles or their nest sites are found, the biologist will contact CDFW to determine whether relocation and/or avoidance buffers and nest enclosures are appropriate. If CDFW approves of moving the individual, the biologist will be allowed sufficient time to move the northwestern pond turtle from the work site before work activities begin.
- If northwestern pond turtle, which is currently proposed for listing, is listed under ESA by the time of implementation, the applicant will implement the above measures in consultation with and with approval from USFWS.

Coast Horned Lizard

- If habitat potentially suitable for coast horned lizard is determined to be present within or in the vicinity of the area of impact, the implementing agency will retain a qualified biologist familiar with coast horned lizard.
- Within 14 days before the initiation of construction activities or off-site improvements, a qualified biologist familiar with the life history of coast horned lizard shall conduct a preconstruction survey of habitat suitable for this species on the project site, which shall include walking linear transects of the site.

- If coast horned lizards are not detected during the preconstruction survey, the qualified biologist shall submit a report summarizing the results of the survey to the applicant and El Dorado County, and further mitigation shall not be required.
- If coast horned lizards are detected, a qualified biologist with an appropriate CDFW Scientific Collecting Permit that allows handling of reptiles shall be present during initial ground disturbance activities and shall inspect the project site before initiation of project activities. If coast horned lizards are detected, the qualified biologist shall move individuals into nearby suitable habitat that will not be disturbed by project activities

California Spotted Owl

- If habitat potentially suitable for California spotted owl is determined to be present within the area of impact, the implementing agency will retain a qualified biologist to conduct protocol-level surveys for the species in suitable nesting habitat within 0.25 miles of the area of impact prior to initiation of construction activities. Surveys for California spotted owl will follow the *Protocol for Surveying for Spotted Owl in Proposed Management Activity Areas and Habitat Conservation Areas* (USFS 1993) or any protocol subsequently developed by USFWS should the species be listed. If applicable to location of project, US Forest Service biologists from either the Plumas National Forest, Tahoe National Forest, or El Dorado National Forest will be contacted to determine if they have any recent survey and occurrence data for California spotted owl that have not been made publicly available to determine presence within 0.25 miles of the project site. This can include other US Forest Service designated habitat for California spotted owl, such as protected activity centers or core areas.
- If California spotted owl is determined to not be present within 0.25 miles of the project site, then further mitigation will not be required.
- If nesting California spotted owl or other California spotted owl habitat designated by the US Forest Service are identified within the area of impact or within 0.25 miles of the area of impact, project activities will be delayed within 0.25 miles of the area of impact between March 1 and August 31 to avoid disturbances to or loss of the active nest site until the nest is no longer active. Project activities include vegetation removal, earth moving, and construction. This buffer may be reduced through consultation with CDFW or USFWS if this species is listed under ESA by the time of implementation. The following will also apply:
  - The project applicant will not remove any trees between September 1 and February 28 that contain active nest sites for California spotted owl during the breeding season. Once a qualified biologist has deemed a nest site inactive for 2 consecutive years, the restriction to protect the nest tree will be lifted.
  - If California spotted owl, which is currently proposed for listing, is listed under ESA by the time of implementation, the applicant will implement the above measures in consultation with and approval from USFWS.
- If avoiding work between March 1 and August 31 is not feasible, a no disturbance buffer of 0.25 mile will be established around active California spotted owl nests and any other US Forest Service California spotted owl designated habitat (e.g., protected activity center) and no construction activities will occur within this buffer until the chicks have fledged as determined by a qualified Registered Professional Forester or biologist.

American Goshawk

- If habitat potentially suitable for American goshawk (previously northern goshawk) is determined to be present within the area of impact, the implementing agency will retain a qualified biologist to conduct protocol-level surveys for the species in suitable nesting habitat within 0.25 miles of the area of impact prior to initiation of construction activities. Surveys for American goshawk will follow the *Northern Goshawk Inventory and Monitoring Technical Guide* (Woodbridge and Hargis 2006), or another appropriate method determined by the appropriate regulatory agency. If applicable to location of project, US Forest Service biologists from either the Plumas National Forest, Tahoe National Forest, or El Dorado National Forest will be contacted to determine if they have any recent survey and occurrence data for American goshawk that have not been made publicly available to determine presence within 0.25 miles of the project site. This can include other US Forest Service designated habitat for American goshawk, such as protected activity centers.

- If no American goshawk nests are found, then further mitigation will not be required.
- If nesting American goshawk or other American goshawk habitat designated by the US Forest Service are identified within the area of impact or within 0.25 miles of the area of impact, project activities will be delayed within 0.25 miles of the area of impact between March 15 and August 15 to avoid disturbances to or loss of an active nest site, until the nest is no longer active. Project activities include vegetation removal, earth moving, and construction. This buffer may be reduced through consultation with CDFW.
- If avoiding work between March 15 and August 15 is not feasible, a no disturbance buffer of 0.25 mile will be established around active American goshawk nests and any other US Forest Service American goshawk designated habitat (e.g., protected activity center) and no construction activities will occur within this buffer until the chicks have fledged as determined by a qualified Registered Professional Forester or biologist.

Great Gray Owl

- If habitat potentially suitable for great gray owl is determined to be present within the area of impact, the implementing agency will retain a qualified biologist to conduct protocol-level surveys for the species in suitable nesting habitat within 0.25 miles of the area of impact prior to initiation of construction activities. Surveys for great gray owl will follow the *Survey Protocol for Great Gray Owl (*Strix nebulosa*) within the Northwest Forest Plan Area* (Huff and Goodwin 2016), or another appropriate method determined by the appropriate regulatory agency.
- If no great gray owl nests are found, then further mitigation will not be required.
- If great gray owl nests are identified in the area of impact or within 0.25 miles of the area of impact, project activities will be delayed within 0.25 miles of the area of impact between March 15 and July 15 to avoid disturbances to or loss of an active nest site, until the nest is no longer active. Project activities include vegetation removal, ground disturbance, and construction. This buffer may be reduced through consultation with CDFW.

Swainson's Hawk

- If habitat potentially suitable for Swainson's hawk is identified within or in the vicinity of the area of impact, and if construction activities occur between February 1 and August 31, the implementing agency will retain a qualified biologist to conduct surveys for Swainson's hawk in accordance with the Swainson's Hawk Technical Advisory Committee 2000 guidelines (SHTAC 2000), or current guidance. Surveys will cover a minimum of a 0.5-mile radius around the construction area.
- If no Swainson's hawk nests are detected, then further mitigation will not be required.
- If nesting Swainson's hawks are detected, a no disturbance buffer of between 0.25-miles and 0.5-miles will be established around nest occurrences, depending on the level of existing human disturbance in the vicinity of the nest site. Buffers will be maintained until a qualified biologist has determined that the young have fledged.
    - The buffer may be adjusted if, in consultation with CDFW, a qualified biologist determines that an alternative buffer will not result in take of Swainson's hawks adults, young, or eggs because of particular site features (e.g., topography, natural line-of-sight barriers), level of project disturbance, or other considerations. If the buffer is reduced, a qualified biologist will monitor the behavior of the Swainson's hawks during all project activities within 0.25 miles or 0.5 miles (depending on the level of existing human disturbance in the vicinity of the nest site) of the nesting Swainson's hawk. If the Swainson's hawks are disturbed or agitated (e.g., vocalizations, fluffing feathers to increase body size appearance) by the project activities, the biologist will have the authority to halt the activities and re-establish a buffer consistent with the bullet directly above until the agitated behavior ceases and normal behavior resumes.
- If potential nesting trees are to be removed during construction activities, removal will take place outside of Swainson's hawk nesting season and the implementing agencies will develop a plan, in consultation with CDFW, to replace known nest trees at a ratio of 3:1. If replacement planting is implemented, monitoring will be conducted annually for 5 years to assess the mitigation's effectiveness. The plan will include a performance standard for the mitigation that results in a no net loss of nesting habitat.

- If foraging habitat (e.g., annual grassland, agricultural land) is removed as a result of the project, mitigation will occur at a 1:1 ratio, which may be achieved through the dedication of a conservation easement, purchasing appropriate mitigation bank credits, or another CDFW approved action.

Burrowing Owl

- If proposed activities are implemented in habitat suitable for burrowing owls, a qualified biologist will conduct surveys for burrowing owls in areas of habitat suitable for the species on and within 1,640 feet (500 meters) of the project site. Inaccessible areas (e.g., adjacent private property) will not be surveyed directly, but the biologist may use binoculars or a spotting scope to survey these areas. A minimum of four surveys will be conducted to determine whether burrowing owls occupy the site. Surveys will be conducted according to Appendix D of the 2012 *Staff Report on Burrowing Owl Mitigation* prepared by the California Department of Fish and Game (now CDFW) (CDFG 2012), or any subsequent updated guidance. If feasible, at least one survey should be conducted between February 15 and April 15 and the remaining surveys should be conducted between April 15 and July 15, at least three weeks apart. Because burrowing owls may recolonize a site after only a few days, one of the surveys, or an additional survey, will be conducted no less than 14 days before initiating ground disturbance activities to verify that take of burrowing owl would not occur.
- If no burrowing owls are found, the qualified biologist will submit a report documenting the survey methods and results to the lead agency, and no further mitigation will be required.
- If a burrow occupied by a burrowing owl is found during the surveys, the project applicant will establish and maintain a buffer around the occupied burrow and any identified satellite burrows (i.e., non-nesting burrows that burrowing owls use to escape predators or move young into after hatching) to prevent take of the burrowing owls.
  - During the non-breeding season (September 1 through January 31), the minimum buffer distance will be 164 feet (50 meters). During the breeding season (February 1 through August 31), the minimum buffer distance will be increased to 1,640 feet (500 meters).
  - The buffer may be adjusted if, in consultation with CDFW, a qualified biologist determines that an alternative buffer will not result in take of burrowing owl adults, young, or eggs because of particular site features (e.g., topography, natural line-of-sight barriers), level of project disturbance, or other considerations. If the buffer is reduced, a qualified biologist will monitor the behavior of the burrowing owls during all project activities within 1,640 feet of the burrow. If the owls are disturbed or agitated (e.g., vocalizations, bill snaps, fluffing feathers to increase body size appearance, drooping wings and rotating them forward, crouching and weaving back and forth) by the project activities, the biologist will have the authority to halt the activities and re-establish a buffer consistent with the bullet directly above until the agitated behavior ceases and normal behavior resumes.
  - The buffer will remain in place around the occupied burrow and associated satellite burrows until a qualified biologist has determined through noninvasive methods that the burrows are no longer occupied by burrowing owl. A previously occupied burrow will be considered unoccupied if surveys demonstrate that no owls have used the burrow for seven consecutive days.
  - Locations of burrowing owls detected during surveys will be reported to the CNDDB.
- If implementation of a buffer to prevent take of burrowing owl is not feasible, the project applicant will consult with CDFW.
- The project applicant will compensate for the loss of burrowing owl by establishing permanent protection and perpetual management on land that provides burrowing owl habitat. Habitat management lands for burrowing owl may be established by conservation easement or fee title or credits may be purchased from a CDFW-approved conservation or mitigation bank

Other Special-Status Raptors

- If habitat potentially suitable for other nesting special-status raptors (e.g., ferruginous hawk [*Buteo regalis*], golden eagle, bald eagle, northern harrier) or common raptors protected under California Fish and Game Code (e.g., red-tailed hawk, red-shouldered hawk) is identified within the area of impact or within 0.5 miles of the area of impact for golden eagle, 0.25 miles of the area of impact for bald eagle and American peregrine falcon, and 500 feet of the area of impact for all other raptors, all tree removal activities and construction activities will occur during the nonbreeding season (September 1 through January 31), if feasible.

- If tree removal or other construction activities must occur between February 1 and August 31, the implementing agency will retain a qualified biologist to conduct a preconstruction survey for nesting raptors within 0.5 miles, 0.25 miles, or 500 feet, depending on the species (see bullet above) of the area of impact no more than 7 days prior to initiation of construction.
- If no nests are detected, then further mitigation will not be required.
- If nests are detected, impacts on nesting raptors, including direct impacts and indirect impacts (e.g., noise, presence of construction crews) will be avoided by establishing appropriate buffers around active nest sites identified during preconstruction nest surveys. Factors to be considered for determining buffer size will include the presence of natural buffers provided by vegetation or topography; nest height; locations of foraging territory; and baseline levels of noise and human activity. Buffer size may be adjusted if the qualified biologist, in consultation with CDFW, determines that such an adjustment will not be likely to adversely affect the nest. The buffer areas will be flagged for avoidance, and no activity will occur within the buffer areas until the qualified biologist has determined, in coordination with CDFW, that the young have fledged, the nest is no longer active, or reducing the buffer would not likely result in nest abandonment. Monitoring of the nest by a qualified biologist during and after construction activities will be required if the activity has potential to adversely affect the nest.
- If bald or golden eagle nests are found during preconstruction surveys, then the nest tree will not be removed.
- Disturbance, injury, or mortality of bald eagle, California condor, golden eagle, and white-tailed kite will be completely avoided.

Western Yellow-Billed Cuckoo, Least Bell's Vireo, and Willow Flycatcher

- If habitat potentially suitable for western yellow-billed cuckoo, least Bell's vireo, or willow flycatcher is determined to be present within or in the vicinity of the area of impact, the implementing agency will retain a qualified biologist to conduct protocol-level surveys for these species following the guidance offered in *A Natural History Summary and Survey Protocol for the Western Distinct Population Segment of the Yellow-billed Cuckoo* (Halterman et al. 2016); *Least Bell's Vireo Survey Guidelines* (USFWS 2001); *A Survey Protocol for Willow Flycatcher in California* (Bombay et al. 2003) and/or current industry standards, and the implementing agencies will initiate consultation with USFWS and CDFW.
- If no nests or territories are detected, then further mitigation will not be required.
- If nests are detected, the implementing agency will establish buffers around nests that are sufficient to ensure that breeding is not likely to be disrupted or adversely affected by construction. No-disturbance buffers around active nests will be a minimum of 250 feet, unless a qualified biologist determines that smaller buffers would be sufficient to avoid impacts on nesting birds in consultation with CDFW or USFWS. Factors to be considered for determining buffer size will include: the presence of natural buffers provided by vegetation or topography; nest height; locations of foraging territory; and baseline levels of noise and human activity. Buffers will be maintained until a qualified biologist has determined that young have fledged and are no longer reliant upon the nest or parental care for survival.

Other Special-Status Birds

- If habitat potentially suitable for other special-status nesting birds (e.g., bank swallow [*Riparia riparia*], black swift [*Cypseloides niger*], grasshopper sparrow [*Ammodramus savannarum*], loggerhead shrike; see Appendix C-2 for full list) or other native nesting birds protected under section 3503 of the California Fish and Game Code is identified within the area of impact or within 100 feet of the area of impact, all tree removal activities and construction activities will occur during the nonbreeding season (September 1–January 31), if feasible. If tree removal or other construction activities must occur between February 1 and August 31, the implementing agency will retain a qualified biologist to conduct protocol-level nest surveys within 500 feet of the area of impact no more than 7 days prior to initiation of construction.

- If no nests are detected, then further mitigation will not be required.
- If nests are detected, direct impacts and indirect impacts (e.g., noise, presence of construction crews) will be avoided by establishing appropriate buffers around active nest sites. Factors to be considered for determining buffer size will include the presence of natural buffers provided by vegetation or topography; nest height; locations of foraging territory; and baseline levels of noise and human activity. Buffer size may be adjusted if the qualified biologist, in consultation with CDFW or USFWS, determines that such an adjustment would not be likely to adversely affect the nest. The buffer areas will be flagged, and no activity will occur within the buffer areas until the qualified biologist has determined, in coordination with CDFW or USFWS, that the young have fledged, the nest is no longer active, or reducing the buffer would not likely result in nest abandonment. Monitoring of the nest by a qualified biologist during and after construction activities will be required if the activity has potential to adversely affect the nest.
- Disturbance, injury, or mortality of California black rail, greater sandhill crane will be completely avoided.

Special-Status Fish

- If aquatic habitat potentially suitable for special-status fish is identified within the area of impact, and construction activities could result in adverse effects on this habitat, impacts on these species will be avoided by implementing the following measures:
  - All work within waters where there is potential for Delta smelt (*Hypomesus transpacificus*) to occur, as defined in the most recent USFWS guidance, will be confined to a seasonal work window of August 1 through November 30 when Delta smelt are least likely to be present. Because this species does not regulate its movement strictly within this time frame, modification to the work windows may be approved by USFWS prior to project implementation based on information from the various in-Delta monitoring programs.
  - In-water construction activities where there is potential for steelhead and/or Chinook salmon to occur will be limited to the low-flow period between June 1 and October 1 to minimize the potential of adverse effects on federally listed anadromous salmonids during their emigration period.
  - In-channel construction activities that could affect habitat for listed anadromous salmonids will be limited to daylight hours during weekdays, leaving a nighttime and weekend period of passage for these fish species.
  - Construction best management practices for off-channel staging and storage of equipment and vehicles will be implemented to minimize the risk of contamination of streams and rivers by spilled materials. Best management practices will also include minimization of erosion and stormwater runoff, as appropriate.
  - If bank stabilization activities are necessary, then such stabilization will be constructed to minimize predator habitat, minimize erosion potential, and contain material suitable for supporting riparian vegetation.
- For federally listed species, if the final rule regarding the interpretation of the definition of take (Federal Register Vol. 90 No. 73, USFWS 2025) is approved and published prior to implementation of projects under the 2025 Blueprint EIR, instead of being required to follow the mitigation measures listed above, the project proponent will comply with the legal requirements of ESA as amended by the final rule and will provide mitigation as directed by USFWS or NOAA Fisheries (which could include the above, if directed).

Crotch's Bumble Bee

- If habitat potentially suitable for Crotch's bumble bee is identified within the area of impact, and this habitat cannot be avoided, the applicant will retain a qualified biologist familiar with bumble bees of California, and with experience using survey methods for bumble bees, to conduct focused surveys of habitat potentially suitable for Crotch's bumble bee within the project site. *Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species* (CDFW 2023) will be used to guide surveys.

- If no Crotch's bumble bees are not detected during focused surveys, the survey results will be submitted to the appropriate County, and no further mitigation will be required.
- If Crotch's bumble bees are detected during focused surveys, the survey results will be submitted to the lead agency, and appropriate avoidance measures will be implemented in consultation with and with approval from CDFW. Avoidance measures may include the following, if feasible:
  - Protective buffers will be implemented around active overwintering or breeding colonies until the colonies are no longer active.
  - Construction activities will occur from October through February to avoid the bumble bee flight season.
  - Construction activities, including ground disturbance, will be conducted using a phased approach, such that the entirety of the habitat is not removed at once; the objective of this measure is to provide refuge for bumble bees during project activities and temporary retention of suitable floral resources proximate to the active construction areas.

Monarch

- If habitat potentially suitable for monarch is identified in the area of impact, and this habitat cannot be avoided, the following will apply:
  - If construction activities (e.g., ground disturbance, vegetation removal, staging) on the project site occur during the period when milkweed plants may host monarch eggs or caterpillars (approximately mid-March through late September, depending on elevation and other factors) a qualified biologist will survey the project site for milkweed plants.
  - If milkweed plants are found, a qualified biologist will inspect the milkweed plants for the presence of monarch eggs or caterpillars no more than 14 days before plant removal. If monarch eggs or caterpillars are detected, the milkweed plants will be avoided until they are no longer being used by monarch caterpillars, as confirmed by a qualified biologist, if feasible.
  - If no eggs or caterpillars are detected, no additional protection measures are necessary
- If monarch, which is currently proposed for listing, is listed under ESA, the applicant will implement the above measures in consultation with and with approval from USFWS.

Special-Status Vernal Pool Invertebrates

- If habitat potentially suitable for vernal pool invertebrate species (i.e., Conservancy fairy shrimp, midvalley fairy shrimp [*Branchinecta mesovallensis*], vernal pool fairy shrimp, vernal pool tadpole shrimp, Ricksecker's water scavenger beetle [*Hydrochara rickseckeri*]) is identified within the area of impact, and this habitat cannot be avoided, the implementing agency will retain a qualified biologist to conduct vernal pool invertebrate surveys in the area of impact and within 250 feet from the edge of the area of impact to evaluate direct and indirect effects on vernal pools in accordance with the *Programmatic Formal Endangered Species Act Consultation on Issuance of 404 Permits for Projects with Relatively Small Effects on Listed Vernal Pool Crustaceans within the Jurisdiction of the Sacramento Field Office, California* (USFWS 1996).
- Habitat Preservation: The implementing agencies will compensate for indirect effects of the project on habitat for vernal pool invertebrates at a sufficient ratio for no net loss of habitat function or acreage, by purchasing vernal pool preservation credits from a USFWS-approved conservation bank, or from another USFWS-approved conservation bank. Compensation credits will be purchased prior to any ground-disturbing activities.
- Habitat Creation: The implementing agencies will compensate for the direct effects of the project on habitat for vernal pool invertebrates at a sufficient ratio for no net loss of habitat function or acreage, by purchasing vernal pool creation credits from a USFWS-approved conservation bank, or from another USFWS-approved conservation bank.

- For seasonal wetlands and drainages that will be retained in the area of impact (i.e., those not proposed to be filled), a minimum no-disturbance buffer of at least 50 feet from these features will be implemented in the project area. The buffer area will be flagged with high visibility construction flagging prior to commencement of ground-disturbing activities and will be maintained for the duration of construction activities. All flagged areas will be avoided.
- For federally listed species, if the final rule regarding the interpretation of the definition of take (Federal Register Vol. 90 No. 73, USFWS 2025) is approved and published prior to implementation of projects under the 2025 Blueprint EIR, instead of being required to follow the mitigation measures listed above, the project proponent will comply with the legal requirements of ESA as amended by the final rule and will provide mitigation as directed by USFWS or NOAA Fisheries (which could include the above, if directed).

Valley Elderberry Longhorn Beetle

- If elderberry shrub habitat suitable for valley elderberry longhorn beetle is identified in the area of impact, the implementing agency will retain a qualified biologist to conduct surveys for valley elderberry longhorn beetle according to the protocol outlined in USFWS *Framework for Assessing Impacts to the Valley Elderberry Longhorn Beetle* (USFWS 2017). The biologist will determine if there is a riparian area or known valley elderberry longhorn beetle records within 2,526 feet (800 meters) of the project site, and whether the project site is continuous with a historical riparian corridor.
- If the project site does not contain riparian habitat, but does contain elderberry shrubs, then the elderberry shrubs will be inspected for valley elderberry longhorn beetle exit holes. If exit holes are not present the implementing agency will consult with USFWS and will consider additional information, including occurrences of valley elderberry longhorn beetle within 800 meters of the project site, and proximity of the project site to existing and historic riparian corridors.
- If riparian habitat is present within the project site and elderberry shrubs are present within 165 feet, then it is likely that the site is occupied by valley elderberry longhorn beetle. If the project site contains riparian habitat and elderberry shrubs are not present within 165 feet, the implementing agency will consult with USFWS, as presence of riparian habitat is indicative of historic valley elderberry longhorn beetle occupancy.
- Impacts on valley elderberry longhorn beetle will be avoided and minimized by following the Conservation Measures outlined in the USFWS 2017 Framework for cases where elderberry shrubs can be retained and protected within 165 feet of the project footprint.
- If elderberry shrubs are 165 feet or more from project activities, direct or indirect impacts are not expected. Shrubs will be protected during construction by establishing and maintaining high visibility flagging at least 165 feet from the drip line of each elderberry shrub. Flagged areas will be avoided.
- If elderberry shrubs can be retained within the project footprint, project activities may occur up to 20 feet from the dripline of elderberry shrubs if precautions are implemented to minimize the potential for indirect impacts. Specifically, these minimization measures include:
  - All areas to be avoided during construction activities will be flagged as close to construction limits as possible.
  - A minimum avoidance area of at least 20 feet from the dripline of each elderberry plant will be maintained to avoid direct impacts that could damage or kill the plant.
  - A qualified biologist will provide training for all contractors, work crews, and any onsite personnel on the status of valley elderberry longhorn beetle, its host plant and habitat, the need to avoid damaging the elderberry shrubs, and the possible penalties for non-compliance.
  - A qualified biologist will monitor the work area at project-appropriate intervals to assure that all avoidance and minimization measures are implemented. The amount and duration of monitoring will depend on the project specifics and will be discussed with a USFWS biologist.

- As much as feasible, all activities that could occur within 165 feet of an elderberry shrub will be conducted outside of the flight season of the valley elderberry longhorn beetle (March–July).
- Trimming of elderberry shrubs will occur between November and February and will avoid removal of any branches or stems that are greater than or equal to 1 inch in diameter to avoid and minimize adverse effects to valley elderberry longhorn beetle.
- Project activities, such as truck traffic or other use of machinery, will not create excessive dust on the project site, such that the growth or vigor of elderberry shrubs is adversely affected. Enforcement of a speed limit and watering dirt roadways are potential methods to minimize excessive dust creation.
- Herbicides will not be used within the dripline of any elderberry shrub. Insecticides will not be used within 98 feet of any elderberry shrub. All chemicals will be applied using a backpack sprayer or similar direct application method. Mechanical weed removal within the dripline of any elderberry shrub will be limited to the season when adults are not active (August–February) and will avoid damaging the elderberry.
- Erosion control will be implemented, and the affected area will be re-vegetated with appropriate native plants.

- If elderberry shrubs cannot be avoided, consultation with USFWS will be required. Conservation and minimization measures are likely to include preparation of supporting documentation that describes methods for relocation of existing shrubs and maintaining existing shrubs and other vegetation in a conservation area. All elderberry shrubs with stems greater than 1 inch in diameter that cannot be avoided or have been adversely affected by indirect damage to stems of the entire shrub will be transplanted.
- Relocation of existing elderberry shrubs and planting of new elderberry seedlings and associated riparian species will be implemented according to the Framework (USFWS 2017). The Framework uses presence or absence of exit holes, and whether the affected elderberry shrubs are located in riparian habitat to determine the number of elderberry seedlings or cuttings and associated riparian vegetation that would need to be planted as compensatory mitigation for affected valley elderberry longhorn beetle habitat. Compensatory mitigation may include purchasing credits at a USFWS-approved conservation bank, providing on-site mitigation, or establishing and protecting habitat for valley elderberry longhorn beetle.
- If the final rule regarding the interpretation of the definition of take (Federal Register Vol. 90 No. 73, USFWS 2025) is approved and published prior to implementation of projects under the 2025 Blueprint EIR, instead of being required to follow the mitigation measures listed above, the project proponent will comply with the legal requirements of ESA as amended by the final rule and will provide mitigation as directed by USFWS or NOAA Fisheries (which could include the above, if directed).

Special-Status Bats

- If habitat suitable for bat roosts or bat colonies is identified in the area of impact that may be adversely affected by construction activities, the implementing agency will retain a qualified biologist to conduct a preconstruction bat survey no more than 14 days prior to the start of construction. The survey may include investigation of habitat for special-status bats (e.g., rocky outcrops, trees, snags, bridges, mines, caves, human-made structures) for bat use (e.g., guano), and/or an evening emergence survey. If evidence of bat use is observed, the species and number of bats using the roost will be determined. Bat detectors may be used to supplement survey efforts.
- If no bat roosts are observed, further mitigation will not be required.
- If surveys confirm bats daytime-roost will be affected by construction activities, a Bat Exclusion Plan will be developed by the implementing agency and submitted to CDFW for review and approval prior to its implementation. No bat exclusion will occur between March 1 and August 15 (depending on location) which coincides with the maternity season in California.
- If a winter roost, a maternity roost, or any roost of a special-status bat species (i.e., pallid bat, spotted bat, Townsend’s big-eared bat, western mastiff bat, western red bat) is found, a mitigation program addressing mitigation for the specific occurrence will be submitted to CDFW by the implementing agency and qualified

biologist for review and approval to determine whether measures are appropriate. The mitigation plan will establish a buffer area around the colony during hibernation or while females in maternity colonies are nursing young that is large enough to prevent disturbance to the colonies.

American Badger

- If burrow habitat potentially suitable for American badger is identified within the area of impact, the implementing agency will retain a qualified biologist to conduct a preconstruction survey for American badger. The survey will be conducted no more than 30 days prior to initiation of construction and will include visual inspection (e.g., direct observation, monitoring, trail camera) of suitable burrows to determine whether they are occupied.
- If no occupied burrows are found, further mitigation will not be required.
- If occupied burrows are found, impacts on active badger dens will be avoided by flagging exclusion zones around all active badger dens, within which construction activities will be prohibited until denning activities are complete or the den is abandoned. The qualified biologist will monitor each den once per week to track the status of the den and to determine when it is no longer occupied.

Special-Status Forest Carnivores

- If habitat potentially suitable for wolverine, fisher, or Sierra Nevada red fox is identified in the area of impact, the implementing agency will retain a qualified biologist to conduct a preconstruction survey prior to commencement of construction activities (e.g., tree removal, ground disturbance) for these species within the area of impact and a 0.25 miles buffer of the area of impact.
- If individuals or potential or occupied dens are not found, further mitigation will not be required.
- If wolverine, fisher, or Sierra Nevada red fox are identified, or if potential dens of these species are located, an appropriate method will be used by a qualified wildlife biologist to confirm whether the den is occupied. This may involve use of remote field cameras, track plates, or hair snares. Other devices such as fiber optic scope may be utilized to determine occupancy. If the potential den is not occupied, the entrance will be temporarily blocked so that no other animals occupy the area during the construction period but only after it has been fully inspected. The blockage will be removed once construction activities have been completed.
- If a den is found to be occupied by one of these species, a no-disturbance buffer will be placed around the occupied den location. The no-disturbance buffer will include the den tree (or other structure) plus a suitable buffer as determined by the biologist in coordination with USFWS or CDFW, as appropriate depending on species status. Construction activities in the no-disturbance buffer will be avoided until the den is no longer occupied as determined by a qualified wildlife biologist in coordination with USFWS and CDFW.
- Disturbance, injury, or mortality of California wolverine will be avoided.

Northern California Ringtail

- If habitat potentially suitable for northern California ringtail is identified within the area of impact the implementing agency will retain a qualified biologist to conduct preconstruction surveys to identify individual northern California ringtails and potential nests.
- If individuals or potential or occupied nests are not found, further mitigation will not be required.
- If northern California ringtail or potential nests are found, an appropriate method will be used by the qualified biologist to confirm whether a northern California ringtail is occupying the nest (e.g., remote field cameras, track plates, hair snares, fiber optic scope).
- If a nest is determined to be occupied by a northern California ringtail, a buffer will be established around the nest tree (or other nest structure) sufficient to protect the nest from construction disturbance as determined by the qualified biologist in coordination with CDFW. No construction activities will occur within the buffer until the nest is unoccupied as determined by a qualified wildlife biologist in coordination with CDFW.

- Disturbance, injury, or mortality of northern California ringtail will be avoided.

Salt-Marsh Harvest Mouse

- If habitat potentially suitable for salt-marsh harvest mouse is identified within the area of impact or within 100 feet of the area of impact, all habitat for salt-marsh harvest mouse including pickleweed (*Arthrocnemum* spp.) will be avoided, if feasible.
- If avoidance is not feasible, pickleweed and other vegetation in habitat potentially suitable for the species will be removed by hand (i.e., with non-motorized equipment). While removal occurs, a USFWS-approved biologist will monitor in front of the vegetation removal, walking at a safe distance in front of vegetation removal equipment to ensure no salt marsh harvest mice are present. The following will also apply:
  - Prior to initiation of work activities within suitable habitat, the USWFS-approved biologist will survey the work area for the presence of salt marsh harvest mice and their nests.
  - Surveys will be repeated daily prior to the beginning project activities at the proposed project site; one or more USFWS-approved biologists will survey the proposed project site to ensure it is clear of salt marsh harvest mice.
  - Project activities will be restricted to daylight hours 30 minutes after sunrise and 30 minutes before sunset.
  - Project activities will avoid high tides and periods when the marsh plain is inundated.
  - Additional measures for vegetation removal will apply and are as follows:
    - Vegetation removal will move in a direction toward salt marsh harvest mouse habitat and continue in a uniform direction.
    - Vegetation will be removed to bare ground or stubble no higher than 1 inch. Vegetation will be cut in at least two passes: with the first pass cutting vegetation at approximately half of its height above the ground (mid-canopy) and the next pass, or subsequent passes, cutting vegetation to ground-level or no higher than 1 inch.
    - Cut vegetation will not be piled in the area where vegetation removal is taking place (what will be the avoidance area). It will be removed from the avoidance area as it is being cut, so that no standing or cut vegetation remains in the avoidance area when flagging is installed.
  - While work is occurring, flagging will be placed around the defined work area prior to the start of construction or other ground disturbing activities and immediately after vegetation removal. No project activities will occur in the flagged area.
  - The USWFS-approved biologist will conduct daily surveys to ensure that the flagging is intact and that no mice have entered the project area.
- If the final rule regarding the interpretation of the definition of take (Federal Register Vol. 90 No. 73, USFWS 2025) is approved and published prior to implementation of projects under the 2025 Blueprint EIR, instead of being required to follow the mitigation measures listed above, the project proponent will comply with the legal requirements of ESA as amended by the final rule and will provide mitigation as directed by USFWS or NOAA Fisheries (which could include the above, if directed).

Special-Status Rabbits and Sierra Nevada Mountain Beaver

- If habitat potentially suitable for Sierra Nevada snowshoe hare, western white-tailed jackrabbit, and Sierra Nevada mountain beaver is identified within the area of impact, the implementing agency will retain a qualified biologist to conduct preconstruction surveys for these species. Surveys will include visual surveys for individuals and potential nests (e.g., shallow forms, cavities, depressions beneath brush).
- If individuals or potential or occupied nests are not found, further mitigation will not be required.

- If occupied nests are observed, a buffer will be established including the nest plus a suitable buffer as determined by the qualified biologist in coordination with CDFW. No construction activities will occur within the buffer until the nest is unoccupied as determined by a qualified wildlife biologist in coordination with CDFW.

Marysville California Kangaroo Rat

- If habitat potentially suitable for Marysville California kangaroo rat is identified within the area of impact or within 100 feet of the area of impact, the implementing agency will retain a qualified biologist to conduct preconstruction surveys within 60 days prior to ground disturbing construction activities. The survey will include burrow searches within 100 feet of the area of impact.
- If suitable burrows are not found, further mitigation will not be required.
- If suitable burrows for this species are identified, focused live trapping surveys may be conducted by a qualified biologist to determine whether the burrows are being used by Marysville California kangaroo rat. If live trapping is not conducted or if live-trapping survey results are inconclusive, a 50-foot buffer will be established around suitable burrows. No construction activities will occur within the buffer until the burrow is unoccupied as determined by a qualified wildlife biologist in coordination with CDFW.

Findings after Mitigation

With implementation of Mitigation Measures 3.4-1, 3.4-2, and 3.4-3, impacts on special-status species would be reduced to less than significant. If take of special-status species cannot be avoided, then compliance with USFWS or CDFW requirements for mitigation under the federal and state endangered species acts would be required, as determined by USFWS or CDFW. If impacts on special-status species cannot be avoided or reduced to a less-than-significant level with the mitigation provided above, then compensation for the loss of species would be required. Compensatory mitigation for species listed under ESA or CESA would occur at an agency-approved mitigation bank or through individual mitigation locations as approved by USFWS or CDFW, as appropriate depending on species status. A mitigation and monitoring plan would be developed by the resource agencies as part of the permitting process describing how unavoidable losses of special-status wildlife species would be compensated. The mitigation and monitoring plan would include how the site would be monitored and the duration of monitoring until the mitigation is successful.

Projects taking advantage of CEQA Streamlining provisions of SB 375 (PRC Sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measure described above to address site-specific conditions, resulting in impacts that are less than significant. However, SACOG cannot require the implementing agency to adopt this mitigation measure, and it is ultimately the responsibility of the implementing agency to determine and adopt project-specific mitigation. Therefore, Impact 3.4-1 would be significant and unavoidable for purposes of this program-level review because SACOG does not have authority to require the implementing agencies to adopt the identified mitigation measures; the mitigation measures are within the responsibility and jurisdiction of another public agency. However, implementation of the mitigation measures identified above or other comparable measures identified by the lead agency at a project level would reduce impacts on biological resources and agencies with jurisdiction to adopt these measures should do so (Pub. Resources Code Section 21081(a)(1), (2).)

Impact 3.4-2: Have a Substantial Adverse Effect on any Riparian Habitat, Sensitive Natural Community, or Other Sensitive Habitats, Including Those Identified in Local or Regional Plans, Policies, or Regulations by CDFW or USFWS

This impact is analyzed for adverse effects of Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 3.4-52 through 3.4-54 of the Draft EIR.

Significance before Mitigation

Because implementation of the Development Pattern and planned transportation network improvements and programs in the 2025 Blueprint at the regional level could result in conversion of habitats that could support sensitive natural communities, riparian habitat, and other sensitive habitats, Impact 3.4-2 would be **potentially significant**.

Mitigation

- Implement Mitigation Measure 3.4-1: Conduct a Biological Resources Assessment

Mitigation Measure 3.4-4: Avoid, Minimize, and Mitigate Impacts on Riparian Habitat, Sensitive Natural Communities, and Other Sensitive Habitats

If the qualified biologist, after implementation of Mitigation Measure 3.4-1, determines that riparian habitat, sensitive natural communities, or other sensitive habitats are present within the area of impact and could be adversely affected by construction activities, then the following measures will be implemented:

- To the extent practicable, and in consideration of other design requirements and constraints (e.g., meeting primary project objectives and needs, avoidance of other sensitive resources), the implementing agency will attempt to design the proposed projects in a way that minimizes the removal of native riparian habitat, sensitive natural communities, and other sensitive habitats, particularly trees that contribute to the overstory canopy of these communities.
- The implementing agency will compensate for permanent loss of riparian habitat at a sufficient ratio, which may be achieved through a combination of on-site restoration/creation, off-site restoration, preservation, or mitigation credits. If mitigation credits are not available, stream and riparian habitat compensation will include the establishment of riparian vegetation on currently unvegetated bank portions of streams affected by the project and enhancement of existing riparian habitat through removal of nonnative species, where appropriate, and planting additional native riparian plants to increase cover, continuity, and width of the existing riparian corridor along streams on the project site and surrounding areas. Construction activities and compensatory mitigation will l include development of a Compensatory Stream and Riparian Mitigation and Monitoring Plan for creating or restoring in-kind habitat in the surrounding area. The Compensatory Stream and Riparian Mitigation and Monitoring Plan will include the following:
    - identification of compensatory mitigation sites and criteria for selecting these mitigation sites;
    - in-kind reference habitats for comparison with compensatory riparian habitats (using performance and success criteria) to document success;
    - monitoring protocol, including schedule and annual report requirements (compensatory habitat will be monitored for a minimum of 5 years from completion of mitigation, or human intervention [including recontouring and grading], or until the success criteria identified in the approved mitigation plan have been met, whichever is longer);
    - ecological performance standards, based on the best available science and including specifications for native riparian plant densities, species composition, amount of dead woody vegetation gaps and bare ground, and survivorship; at a minimum, compensatory mitigation planting sites must achieve 80 percent survival of planted riparian trees and shrubs by the end of the 5-year maintenance and monitoring period or dead and dying trees will be replaced and monitoring continued until 80 percent survivorship is achieved;
    - corrective measures if performance standards are not met;
    - responsible parties for monitoring and preparing reports; and
    - responsible parties for receiving and reviewing reports and for verifying success or prescribing implementation or corrective actions.
- If oak woodland habitat is removed, the implementing agency will determine if the loss of oak woodland would have a significant impact on the environment. If so, an oak woodland mitigation plan will be developed that to offset the loss of habitat acreage and function, which may be achieved through a combination of restoration/creation, preservation, or mitigation credits. At a minimum, the restoration and monitoring plan will include clear goals and objectives, success criteria, specifics on restoration/creation (e.g., plant palette, soils, irrigation), specific monitoring periods and reporting guidelines, and a maintenance plan. Oak woodland restoration or creation will be monitored for a minimum of 5 years and will be considered successful when at

least 75 percent of all plantings have become successfully established. Such mitigation sites will be dedicated either in fee or as an easement in perpetuity held by a qualified agency. Guaranteed funding for maintenance of the mitigation sites will be established.

- If losses of sensitive natural communities or other habitats recognized as sensitive by CDFW (see Appendix C-3) would be substantial, then additional compensation will be provided through creating, restoring, or preserving in perpetuity in-kind communities to offset the loss of habitat function or acreage.

Findings after Mitigation

With implementation of Mitigation Measures 3.4-1 and 3.4-4, impacts on riparian habitat, sensitive natural communities, and other sensitive habitats would be reduced to less than significant. Projects taking advantage of CEQA Streamlining provisions of SB 375 (PRC Sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measure described above to address site-specific conditions, resulting in impacts that are less than significant. However, SACOG cannot require the implementing agency to adopt this mitigation measure, and it is ultimately the responsibility of the implementing agency to determine and adopt project-specific mitigation.

Therefore, Impact 3.4-2 remains significant and unavoidable for purposes of this program-level review because SACOG does not have authority to require the implementing agencies to adopt the identified mitigation measures; the mitigation measures are within the responsibility and jurisdiction of another public agency. However, implementation of the mitigation measures identified above or other comparable measures identified by the lead agency at a project level would reduce impacts on biological resources and agencies with jurisdiction to adopt these measures should do so (Pub. Resources Code Section 21081(a)(1), (2))

Impact 3.4-3: Have a Substantial Adverse Effect on State or Federally Protected Wetlands (Including but Not Limited to Vernal Pool, Fresh Emergent Wetlands, Saline Emergent Wetlands, and Wet Meadows)

This impact is analyzed for adverse effects of Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 3.4-54 through 3.4-56 of the Draft EIR.

Significance before Mitigation

Since implementation of the projected regional growth and land use change and planned transportation network improvements and programs could result in conversion could result in conversion of aquatic habitats, including wetlands, Impact 3.4-3 would be **potentially significant**.

Mitigation

- Implement Mitigation Measure 3.4-1: Conduct a Biological Resources Assessment

Mitigation Measure 3.4-5: Avoid, Minimize, and Mitigate Impacts on Wetland and Other Waters

If the qualified biologist, after implementation of Mitigation Measure 3.4-1, determines that wetlands or other waters are present in the area of impact and could be adversely affected by construction activities, then the following measures will be implemented:

- The implementing agency will conduct a delineation of state or federally protected wetlands and submit the delineation to appropriate agencies for verification. The delineation will be conducted according to methods established in the USACE Wetlands Delineation Manual (Environmental Laboratory 1987), the Arid West Supplement (Environmental Laboratory 2008), the Western Mountains and Valley Supplement (Environmental Laboratory 2010), and state wetland procedures (California Water Board 2021 or current procedures).
- If state or federally protected wetlands are determined to be present within a project site that can be avoided, the qualified biologist will establish a buffer around wetlands and mark the buffer boundary with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway). The buffer will be a minimum width of 25 feet but may be larger if deemed necessary. The appropriate size and shape of the buffer zone will be determined in coordination with the qualified biologist and will depend on the type of wetland

present (e.g., stream, vernal pool, pond), the timing of project activities (e.g., wet or dry time of year), whether any special-status species may occupy the wetland and the species' vulnerability to the project activities, environmental conditions and terrain, and the project activity being implemented.

- Project activities (e.g., ground disturbance, vegetation removal, staging) will be prohibited within the established buffer. The qualified biologist will periodically inspect the materials demarcating the buffer to confirm that they are intact and visible, and wetland impacts are being avoided.
- If any waters of the United States or waters of the state are lost or degraded by the project, these shall be replaced or restored on a no-net-loss basis in accordance with the applicable USACE and California Water Board mitigation standards in place at the time of construction.

Findings after Mitigation

With implementation of Mitigation Measures 3.4-1 and 3.4-5, impacts on state or federally protected wetlands would be reduced to less than significant. Projects taking advantage of CEQA Streamlining provisions of SB 375 (PRC Sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measure described above to address site-specific conditions, resulting in impacts that are less than significant. However, SACOG cannot require the implementing agency to adopt this mitigation measure, and it is ultimately the responsibility of the implementing agency to determine and adopt project-specific mitigation.

Therefore, Impact 3.4-3 would be significant and unavoidable for purposes of this program-level review because SACOG does not have authority to require the implementing agencies to adopt the identified mitigation measures; the mitigation measures are within the responsibility and jurisdiction of another public agency. However, implementation of the mitigation measures identified above or other comparable measures identified by the lead agency at a project level would reduce impacts on biological resources and agencies with jurisdiction to adopt these measures should do so (Pub. Resources Code Section 21081(a)(1), (2).)

Impact 3.4-4: Interfere Substantially with the Movement of Any Native Resident or Migratory Fish or Wildlife Species or with Established Native Resident or Migratory Wildlife Corridors, or Impede the Use of Native Wildlife Nursery Sites

This impact is analyzed for adverse effects of Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 3.4-56 through 3.4-59 of the Draft EIR.

Significance before Mitigation

The plan area encompasses large areas of wildland that provide habitat for both common and rare plants and wildlife. Corridors between areas of natural habitat serve important ecological functions related to connectivity, such as wildlife movement, species dispersal, genetic exchange, and resilience to habitat effects of climate change. Some of these areas were mapped as Essential Connectivity Areas (ECA) for the California Essential Habitat Connectivity Project, which was commissioned by the California Department of Transportation (Caltrans) and CDFW for the purpose of making transportation and land-use planning more efficient and less costly, while helping reduce dangerous wildlife-vehicle collisions. Because implementation of the projected regional growth and land use change and planned transportation network improvements and programs under the proposed 2025 Blueprint could result in conversion of habitats that contain portions of ECA that could disrupt wildlife movement or dispersal corridors, or disturb native wildlife nursery areas, Impact 3.4-4 would be **potentially significant**. (Draft EIR page 3.4-58)

Mitigation

- Implement Mitigation Measure 3.4-1: Conduct a Biological Resources Assessment

Mitigation Measure 3.4-6: Avoid, Minimize, and Mitigate Impacts on Wildlife Movement Corridors or Native Wildlife Nursery Sites

If the qualified biologist, after implementation of Mitigation Measure 3.4-1, determines that wildlife movement corridors or native wildlife nursery sites are present within the area of impact and could be adversely affected by construction activities, then the following measures will be implemented:

- Implementing agencies will design projects such that they avoid and minimize direct and indirect impacts on wildlife movement corridors and/or native wildlife nursery sites. Design considerations may include but would not be limited to the following:
  - constructing wildlife friendly overpasses, underpasses, bridges and/or culverts that are integrated with appropriate roadside fencing that prevents wildlife from going into the roadway and direct them towards crossing structures;
  - using wildlife friendly fencing;
  - limiting wildland conversions in identified wildlife corridors or native wildlife nursery sites;
  - retaining wildlife friendly vegetation in and around developments; and
  - avoiding the nursery or migration season for common wildlife that have important movement corridors or nursery sites in the project area during construction.
- For projects that cannot avoid significant impacts on wildlife movement corridors or native wildlife nursery areas, implementing agencies will consult with CDFW to determine appropriate measures to minimize direct and indirect impacts that could occur as a result of implementing the 2025 Blueprint and will implement measures to mitigate impacts on wildlife corridors or native wildlife nursery sites.
- For projects that require the placement of stream culverts in a fish spawning stream, the implementing agencies will consult with either USACE, NOAA Fisheries, USFWS, and CDFW, as applicable, to identify measures that will allow fish passage through the culverts.
- For projects in or adjacent to riparian corridors, project design will maximize distance of lighting from riparian corridors and direct light sources away from the riparian corridor. Night lighting of trails along riparian corridors should be avoided.

Findings after Mitigation

With implementation of Mitigation Measures 3.4-1 and 3.4-6, impacts on wildlife movement corridors and native nursery sites would be reduced to less than significant. Projects taking advantage of CEQA Streamlining provisions of SB 375 (PRC Sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measure described above to address site-specific conditions, resulting in impacts that are less than significant. However, SACOG cannot require the implementing agency to adopt this mitigation measure, and it is ultimately the responsibility of the implementing agency to determine and adopt project-specific mitigation.

Therefore, Impact 3.4-4 would be significant and unavoidable for purposes of this program-level review because SACOG does not have authority to require the implementing agencies to adopt the identified mitigation measures; the mitigation measures are within the responsibility and jurisdiction of another public agency. However, implementation of the mitigation measures identified above or other comparable measures identified by the lead agency at a project level would reduce impacts on biological resources and agencies with jurisdiction to adopt these measures should do so (Pub. Resources Code Section 21081(a)(1), (2).)

Impact 3.4-5: Conflict with Local Policies or Ordinances Protecting Biological Resources, Such as a Tree Preservation Policy or Ordinance

This impact is analyzed for adverse effects of Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 3.4-59 through 3.4-60 of the Draft EIR.

Significance before Mitigation

Several counties and cities in the plan areas have local ordinances and policies in place to protect biological resources such as streams, sensitive vegetation communities (e.g., riparian areas), and native trees, as well as nonnative trees in urban landscapes. Implementation of the 2025 Blueprint could result in conflicts with local policies or ordinances protecting biological resources. Impact 3.4-5 would be **potentially significant**.

Mitigation

- Implement Mitigation Measure 3.4-1: Conduct a Biological Resources Assessment

Mitigation Measure 3.4-7: Avoid, Minimize, and Mitigate for Impacts on Protected Trees and Other Biological Resources Protected by Local Ordinances

If the qualified biologist, after implementation of Mitigation Measure 3.4-1, determines that local ordinances or policies intended to protect biological resources will apply and that construction activities may result in conflicts with these ordinances or policies, then the following measures will be implemented:

- Implementing agencies will ensure project designs avoid and minimize direct and indirect impacts on protected trees and other locally protected biological resources where feasible, as defined in Section 15364 of the State CEQA Guidelines.
- At a minimum, qualifying protected trees (or other biological resources) will be replaced at ratios included in the local general plan, local policies, or city or county codes in locally approved mitigation sites.
- As part of project-level environmental review, implementing agencies will ensure that projects comply with the most recent general plans, policies, and ordinances, and conservation plans.

Findings after Mitigation

With the implementation of Mitigation Measures 3.4-1 and 3.4-7, Impact 3.4-5 would be reduced to less than significant. Projects taking advantage of CEQA Streamlining provisions of SB 375 (PRC Sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measure described above to address site-specific conditions, resulting in impacts that are less than significant. However, SACOG cannot require the implementing agency to adopt this mitigation measure, and it is ultimately the responsibility of the implementing agency to determine and adopt project-specific mitigation.

Therefore, Impact 3.4-5 would be significant and unavoidable for purposes of this program-level review because SACOG does not have authority to require the implementing agencies to adopt the identified mitigation measures; the mitigation measures are within the responsibility and jurisdiction of another public agency. However, implementation of the mitigation measures identified above or other comparable measures identified by the lead agency at a project level would reduce impacts on biological resources and agencies with jurisdiction to adopt these measures should do so (Pub. Resources Code Section 21081(a)(1), (2)))

Impact 3.4-6: Conflict with the Provisions of an Adopted Habitat Conservation Plan, Natural Communities Conservation Plan, or Other Approved Local, Regional, or State Habitat Conservation Plan

This impact is analyzed for adverse effects of Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 3.4-60 through 3.4-62 of the Draft EIR.

Significance before Mitigation

Some individual projects either under projected regional growth and land use change or planned transportation network improvements and programs in the 2025 Blueprint could include non-covered activities under an adopted conservation plan. These projects would be required to seek coverage outside of these plans for potential impacts on biological resources. Impacts on biological resources that are not mitigated through an adopted conservation plan may result in conflicts with these plans and would be **potentially significant**.

Mitigation

- Implement Mitigation Measure 3.4-1: Conduct a Biological Resources Assessment
- Implement Mitigation Measure 3.4-2: Identify Special-Status Plant Species, and Avoid, Minimize, and Mitigate Impacts
- Implement Mitigation Measure 3.4-3: Identify Special-Status Wildlife and Avoid, Minimize, and Mitigate Impacts
- Implement Mitigation Measure 3.4-4: Avoid, Minimize, and Mitigate Impacts on Riparian Habitat, Sensitive Natural Communities, and Other Sensitive Habitats
- Implement Mitigation Measure 3.4-5: Avoid, Minimize, and Mitigate Impacts on Wetland and Other Waters

Findings after Mitigation

With implementation of Mitigation Measures 3.4-1 through 3.4-5, Impact 3.4-6 would be reduced to a less-than-significant level. Projects taking advantage of CEQA Streamlining provisions of SB 375 (PRC Sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures described above to address site-specific conditions, resulting in impacts that are less than significant. However, SACOG cannot require the implementing agency to adopt these mitigation measures, and it is ultimately the responsibility of the implementing agency to determine and adopt project-specific mitigation.

Therefore, Impact 3.4-6 would be **significant and unavoidable** for purposes of this program-level review because SACOG does not have authority to require the implementing agencies to adopt the identified mitigation measures; the mitigation measures are within the responsibility and jurisdiction of another public agency. However, implementation of the mitigation measures identified above or other comparable measures identified by the lead agency at a project level would reduce impacts on biological resources and agencies with jurisdiction to adopt these measures should do so (Pub. Resources Code Section 21081(a)(1), (2).)

Impact 3.4-7: Substantially Reduce the Habitat of a Wildlife (Including Fish) Species; Cause a Wildlife (Including Fish) Population to Drop Below Self-Sustaining Levels; Threaten to Eliminate a Plant or Wildlife Community; Or Substantially Reduce the Number or Restrict the Range of an Endangered, Threatened, or Rare Species

This impact is analyzed for adverse effects of Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 3.4-62 through 3.4-63 of the Draft EIR.

Significance before Mitigation

Implementation of the projected regional growth and land use change and planned transportation network improvements and programs under the 2025 Blueprint would result in potential impacts on common wildlife species, including temporary disturbances and displacement. Impact 3.4-7 would be **potentially significant**.

Mitigation

- Implement Mitigation Measure 3.4-1: Conduct a Biological Resources Assessment
- Implement Mitigation Measure 3.4-2: Identify Special-Status Plant Species, and Avoid, Minimize, and Mitigate Impacts
- Implement Mitigation Measure 3.4-3: Identify Special-Status Wildlife and Avoid, Minimize, and Mitigate Impacts
- Implement Mitigation Measure 3.4-4: Avoid, Minimize, and Mitigate Impacts on Riparian Habitat, Sensitive Natural Communities, and Other Sensitive Habitats
- Implement Mitigation Measure 3.4-5: Avoid, Minimize, and Mitigate Impacts on Wetland and Other Waters

Findings after Mitigation

With implementation of Mitigation Measures 3.4-1 through 3.4-5, Impact 3.4-7 would be reduced to less than significant. Projects taking advantage of CEQA Streamlining provisions of SB 375 (PRC Sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measure described above to address site-specific conditions, resulting in impacts that are less than significant. However, SACOG cannot require the implementing agency to adopt this mitigation measure, and it is ultimately the responsibility of the implementing agency to determine and adopt project-specific mitigation.

Therefore, Impact 3.4-7 would be significant and unavoidable for purposes of this program-level review because SACOG does not have authority to require the implementing agencies to adopt the identified mitigation measures; the mitigation measures are within the responsibility and jurisdiction of another public agency. However, implementation of the mitigation measures identified above or other comparable measures identified by the lead agency at a project level would reduce impacts on biological resources and agencies with jurisdiction to adopt these measures should do so (Pub. Resources Code Section 21081(a)(1), (2).)

5. Cultural Resources

Impact 3.5-1: Cause a Substantial Adverse Change in the Significance of a Historical Resource

This impact is analyzed for adverse effects of Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 3.5-27 through 3.5-30 of the Draft EIR.

Significance before Mitigation

The potential impacts on historical built environment resources related to construction of projects that could result in modification or removal of a historical resource, and indirect impacts from new visual elements or from noise and vibration from construction projects and ongoing operations resulting from implementation of the 2025 Blueprint, would be **potentially significant**.

Mitigation

Mitigation Measure 3.5-1: Conduct Project-Specific Historic Built Environment Resource Studies and Identify and Implement Project-Specific Mitigation

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

- As part of the project/environmental review of individual projects, a records search at the appropriate Information Center of the CHRIS and a review of literature and historic maps shall be conducted to determine whether the project area has been previously surveyed and whether historic built environment resources were identified.
- In the event the records indicate that no previous survey has been conducted within the last 5 years, a qualified architectural historian (36 CFR Section 61) shall conduct a study of the project area for the presence of historic built environment resources. The study shall include conducting a field survey, necessary background, archival and historic research, consultation with local historical societies, museums or other interested parties as relevant, and preparation of a historic resource assessment report. The report shall document the results of the survey and the historic context, evaluate the federal, state, or local significance of built environment resources greater than 45 years in age that may potentially be directly or indirectly impacted by project activities, recommend appropriate protection or mitigative treatment, if any, and include recordation of identified built environment resources on appropriate California Department of Parks and Recreation (DPR) series 523 forms. The final report and DPR forms shall be filed by the architectural historian with the CHRIS. Recommended treatment for historical built environment resources identified in the report shall be implemented.
- If no significant historic built environment resources are identified in the Historic Resource Assessment Report or prior survey of the project study area that may be directly or indirectly impacted by project activities, then

mitigation for built environment resources is complete, and there is no adverse change to documented historical built environment resources for the project.

- If significant historic built environment resources are identified in the Historic Resource Assessment Report or prior survey of the project study area, the project sponsor and/or implementing agency should consider avoidance as the primary mitigation measure. If avoidance is possible, mitigation to documented historical built environment resources is complete.
- If avoidance of a significant built environment resource is not feasible, then the maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation, or reconstruction of the historical resource, as recommended by a qualified architectural historian or historic architect (36 CFR Section 61) and conducted in a manner consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitation, Restoring, and Reconstructing Historic Buildings or Historic Landscapes shall generally reduce impacts (Birnbaum and Peters 1996; Grimmer 2017). If adherence to the Secretary of the Interior's Standards cannot avoid materially altering in an adverse manner the physical characteristics or historic character of the surrounding environmental setting that contribute to a resource's historic significance, additional mitigation may be required.
- If avoidance or minimization of substantial adverse effects to a significant built environment resource is not feasible through project design or by adherence to the Secretary of the Interior's Standards, the project sponsor and/or implementing agency should ensure that Historic American Buildings Survey (HABS), Historic American Engineering Record (HAER), or Historic American Landscapes Survey (HALS) documentation is completed prior to demolishment or significant material alteration of the resource's physical characteristics or setting. The HABS, HAER, and HALS programs formally document historical resources through the use of large-format photography, measured drawings, written architectural descriptions, and historical narratives. The level of documentation required as mitigation and preparation of the HABS, HAER, or HALS shall be determined and prepared by a qualified architectural historian or historic architect (36 CFR Section 61). The documentation packages shall be archived in appropriate public and secure repositories. Such documentation would not reduce the impact to a less-than-significant level.

Findings after Mitigation

By implementation of this mitigation measure during project-level planning and design, direct impacts to historical built environment resources may be reduced to a less-than-significant level by avoidance or project redesign, by minimizing physical alterations, or by designing building use while retaining a property's historic character. Indirect impacts to historical built environment resources may also be reduced by project-level planning designed to minimize or reduce permanent visual impacts and significant noise or vibration levels. However, because removal of a historically significant building or structure or the loss of character-defining features could still occur, the impact would be significant and unavoidable. For projects proposing to streamline environmental review, lead agencies must conduct project-level analysis for each project to analyze whether, based on substantial evidence in the record, the proposed mitigation would reduce the impact to less than significant.

Impact 3.5-1 would be significant and unavoidable for purposes of this program-level review because SACOG does not have the authority to require the implementing agencies to adopt the identified mitigation measures; the mitigation measures are within the responsibility and jurisdiction of another public agency. Implementation of the mitigation measure identified above or other comparable measure identified by the lead agency at a project level would reduce the impacts to historical built environment resources, and agencies with jurisdiction to adopt these measures should do so (PRC Section 21081(a)(1), (2).) Moreover, specific economic, legal, social, technological, or other considerations, make identification of additional mitigation measures infeasible at the plan level.

Impact 3.5-2: Cause a Substantial Adverse Change in the Significance of Unique Archaeological Resources

This impact is analyzed for adverse effects of Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 3.5-30 through 3.5-34 of the Draft EIR.

Significance before Mitigation

Together, the potential impacts on archaeological resources that could result in substantial alteration or removal of an archaeological resource, and indirect regional impacts from access-related damage from construction projects and ongoing operations resulting from implementation of the 2025 Blueprint would be **potentially significant**.

Mitigation

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

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

- A records search at the appropriate Information Center of the CHRIS shall be conducted by a qualified archaeologist (36 CFR Section 61) as part of the appropriate project/environmental review of individual projects to determine whether the project area has been previously surveyed and whether archaeological resources were identified.
- In the event the records indicate that no previous survey has been conducted or the survey did not meet current professional standards or regulatory guidelines, the qualified archaeologist (36 CFR Section 61) or the Information Center shall make a recommendation on whether a survey is warranted based on the sensitivity of the project area for archaeological resources and current professional standards or regulatory guidelines.
- If a survey is considered warranted, the archaeological study of the project area by a qualified archaeologist shall include conducting a field survey, necessary background research, a Sacred Lands search by the NAHC and outreach to local Native Americans identified by the NAHC, consultation with local historical societies, museums or other interested parties as relevant, and an archaeological survey report. The confidential report shall document the results of the survey and the cultural context, assess the federal, state, or local significance of precontact or historic-era archaeological resources that may potentially be directly or indirectly impacted by project activities, provide appropriate management recommendations, and include recordation of identified archaeological resources on appropriate California DPR series 523 forms. Management recommendations may include additional studies to evaluate identified sites, treatment for documented historical resources, or archaeological monitoring during ground-disturbing construction activities at locations determined by the archaeologist to be sensitive for subsurface cultural resource deposits, including local Native American monitors if sensitive for precontact resources. The final confidential report and DPR forms would be filed by the archaeologist with the CHRIS. Recommended treatment for resources identified in the report should be implemented.
- If no archeological resources are identified in the Archeological Survey Report that may be directly or indirectly impacted by project activities, mitigation is complete as there would be no adverse change to documented archeological resources.
- When a project would impact a known archaeological site, the project sponsor and/or implementing agency shall determine whether the site is a historical resource or an archaeological nature (State CEQA Guidelines Section 15064.5(c)(1)) or unique archaeological resource (PRC Section 21083.2(g)). If archaeological sites identified in the project area are considered potentially significant, the project sponsor and/or responsible implementing agency shall undertake additional studies overseen by a qualified archaeologist (36 CFR Section 61) to evaluate the resources eligibility for listing in the CRHR, NRHP, local register, or as a unique archaeological resource and to recommend further mitigative treatment. Evaluations shall be based on, but not limited to, surface remains, subsurface testing, or archival and ethnographic resources, on the framework of the historic context and important research questions of the project area, and on the integrity of the resource. If a site to be tested is precontact, local tribal representatives should be afforded the opportunity to monitor the ground-disturbing activities. Appropriate mitigation may include curation of artifacts removed during subsurface testing.
- If significant archaeological resources that meet the definition of historical resources of an archaeological nature or unique archaeological resources are identified in the project area, the preferred mitigation of impacts is preservation in place (State CEQA Guidelines Section 15126.4(b); PRC Section 21083.2). Preservation in place may be accomplished by, but is not limited to, avoidance by project design, incorporation within parks, open space or

conservation easements, covering with a layer of sterile soil, or similar measures. If preservation in place is feasible, mitigation is complete. Additionally, where the implementing agency determines that an alternative mitigation method is superior to in-place preservation, the project sponsor and/or implementing agency may implement such alternative measures.

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

Mitigation Measure 3.5-3: Reduce Visibility or Accessibility of Archaeological Resources

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

Findings after Mitigation

By implementing these mitigation measures, direct impacts to archaeological resources may be reduced to a less-than-significant level by avoiding or preserving in place known archaeological resources through project design, and by avoiding or preserving inadvertent discoveries of significant archaeological resources through project redesign. The destruction or substantial alteration of the contributing physical characteristics or character of the physical setting of an archaeological resource, however, would result in a significant and unavoidable direct impact. Indirect impacts to historical resources of an archaeological nature or unique archaeological resources may be reduced to a less-than-significant level by project-level planning designed to reduce public visibility and accessibility.

For projects proposing to streamline environmental review, lead agencies must conduct project-level analysis for each project to analyze whether, based on substantial evidence in the record, the proposed mitigation would likely reduce the impact to less than significant. Impact 3.5-2 would be significant and unavoidable for purposes of this program-level review because SACOG does not have the authority to require the implementing agencies to adopt the identified mitigation measures; the mitigation measures are within the responsibility and jurisdiction of another public agency. However, implementation of the above mitigation measure or other comparable measure identified by the lead agency and a qualified archaeologist at a project level would reduce the impacts to archaeological resources, and agencies with jurisdiction to adopt these measures should do so (PRC Section 21081(a)(1), (2).) Moreover, specific economic, legal, social, technological, or other considerations, make identification of additional mitigation measures infeasible at the plan level.

Impact 3.5-3: Disturb any Human Remains, including those Interred Outside of Dedicated Cemeteries

This impact is analyzed for adverse effects of Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 3.5-34 through 3.5-35 of the Draft EIR.

Significance before Mitigation

There are existing State regulations and oversight in place that would effectively reduce the potential to disturb human remains to an acceptable level. Therefore, this impact is **less than significant**.

The less-than-significant impact determination is confirmed by the Board of Directors based on the evidence and analysis provided in the record.

6. Geology, Soils, and Paleontological Resources

Impact 3.6-1: Directly or Indirectly Expose People or Structures to Potential Substantial Adverse Impacts, Including the Risk of Loss, Injury, or Death Through the Rupture of a Known Earthquake Fault, Strong Seismic Shaking, Seismic-Related Ground Failure, Soil Liquefaction, or Landslides

This impact is analyzed for adverse effects of Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 3.6-27 through 3.6-28 of the Draft EIR.

Significance before Mitigation

The plan area has a relatively low potential for seismic activity, based on review of published geologic maps from the California Department of Conservation. Compliance with local regulations that require completion of project-level geotechnical studies and consistency with California Building Code requirements would reduce the potential for adverse effects related to strong seismic shaking through design features. In addition, the project area is generally not located on land prone to liquefaction or landslides. The small portions of land within the plan area that have potential for liquefaction or landslides are limited to northern Yolo County, and steep terrain in the foothills of the coast range and Seirra foothills that are largely designated as Rural Residential Communities, Agricultural and Natural Lands, and Lands Not Identified for Development in the MTP/SCS Planning Period. Due to the plan area's underlying geology and slope stability, the potential damage related to liquefaction and landslides would be **less than significant**.

The less-than-significant impact determination is confirmed by the Board of Directors based on the evidence and analysis provided in the record.

Impact 3.6-2: Result in Substantial Soil Erosion or the Loss of Topsoil

This impact is analyzed for adverse effects of Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 3.6-28 through 3.6-29 of the Draft EIR.

Significance before Mitigation

Because of the natural topographical gradients of the plan area and because future construction projects would require grading activities, soil erosion from development of the 2025 Blueprint uses may occur. However, individual projects would be required to be in compliance with National Pollutant Elimination System permits, associated best management practices for erosion control, and would submit a SWPPP or comply with CalGreen erosion prevention best management practices, which are proven methods to limit erosion and topsoil loss. Additionally, geotechnical reports and specific grading ordinances are often required to be completed by local jurisdictions for project approvals.

Based on compliance with federal, state, and local regulations, National Pollutant Elimination System permits, grading ordinances, required geotechnical studies, and typical erosion control measures through the CalGreen requirements, regional growth and transportation network improvement programs of the 2025 Blueprint would not be anticipated to result in substantial erosion or the loss of topsoil. This impact would be **less than significant**.

The less-than-significant impact determination is confirmed by the Board of Directors based on the evidence and analysis provided in the record.

Impact 3.6-3: Be Located on Expansive Soil, Creating Substantial Direct or Indirect Risks to Life and Property or Be Located on a Geologic Unit or Soil That is Unstable or That Would Become Unstable as a Result of the Project, and Potentially Result in On- or Off-Site Landslide, Lateral Spreading, Liquefaction, or Collapse

This impact is analyzed for adverse effects of Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 3.6-29 and 3.6-30 of the Draft EIR.

Significance before Mitigation

There is land within the SACOG region that is susceptible to liquefaction, landslides, and lateral spreading. As part of federal, state, and local project approval and review process, a site-specific, project-specific geotechnical report would be prepared. Any recommendations related to soil compaction or unstable soils would be incorporated into the project through the local permitting and approval process. Land use and planned transportation improvements in the SACOG region are not likely to result in landslide, lateral spreading, subsidence, liquefaction, or collapse because all land use development and transportation improvement are subject to state and local geotechnical requirements. This impact would be **less than significant**.

The less-than-significant impact determination is confirmed by the Board of Directors based on the evidence and analysis provided in the record.

Impact 3.6-4: Locate Project Facilities on Expansive Soil, Creating Substantial Direct or Indirect Risks to Property

This impact is analyzed for adverse effects of Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 3.6-30 through 3.6-31 of the Draft EIR.

Significance before Mitigation

Expansive soils are present in the plan area; however, the majority of the plan area has little to no expansive soil. Northwestern Yolo County is the only place in the SACOG region where expansive soils with high swelling potential exist. There is no development planned for this area. Regulatory compliance on an individual project basis would address the potential that the 2025 Blueprint would result in projects on expansive soils that may create a substantial direct or indirect risk to property. This impact would be **less than significant**.

The less-than-significant impact determination is confirmed by the Board of Directors based on the evidence and analysis provided in the record.

Impact 3.6-5: Have Soils Incapable of Adequately Supporting the Use of Septic Tanks or Alternative Wastewater Disposal Systems Where Sewers Are Not Available for the Disposal of Wastewater

This impact is analyzed for adverse effects of Regional Growth and Land Use Change and Transportation Network Improvements and Programs on page 3.6-31 of the Draft EIR.

Significance before Mitigation

The 2025 Blueprint would not result in the installation of septic systems or alternative wastewater disposal systems in soils that are incapable of supporting these systems. Where the regional growth pattern includes low density growth in areas not served by public sewer systems, onsite wastewater treatment systems may be included in project designs subject to reviews and approval by the county environmental health departments. This impact would be **less than significant**

The less-than-significant impact determination is confirmed by the Board of Directors based on the evidence and analysis provided in the record.

Impact 3.6-6: Directly or Indirectly Destroy a Unique Paleontological Resource or Site or Unique Geologic Feature

This impact is analyzed for adverse effects of Regional Growth and Land Use Change and Transportation Network Improvements and Programs on page 3.6-32 and 3.6-33 of the Draft EIR.

Significance before Mitigation

The 2025 Blueprint proposes to manage the predicted growth in the plan area, and paleontological resource discovery is not correlated to land use type, but rather to sensitive geological units present in a location. Paleontological resources and unique geological features exist in El Dorado, Placer, Sacramento, Sutter, Yolo, and Yuba counties. Where development occurs in these sensitive areas, the substantial alteration or removal of a significant paleontological resource could occur during construction. Therefore, implementation of the 2025 Blueprint could inadvertently destroy paleontological resources during construction and the impact would be **potentially significant**.

Mitigation

Mitigation Measure 3.6-1: Site-specific Paleontological Resources Inventory Assessment and Construction Monitoring by a Paleontologist

Prior to initiating any construction in bedrock, a qualified professional paleontologist shall prepare a paleontological resources inventory and assessment for any affected rock units. This report shall include the following components:

- A report of any fossils observed during a reconnaissance-level field survey.
- The results of a records search of appropriate paleontological databases (at a minimum, the database at the University of California, Berkeley Museum of Paleontology) to determine whether any previously recorded fossil localities are located within or immediately adjacent to the area where rock boring is proposed.
- A determination as to whether the geologic formations are of high or low paleontological sensitivity, and a discussion supporting the reasons why the sensitivity determinations were made.

If the rock formation is determined to be of high paleontological sensitivity, a paleontological monitor will be present during construction to monitor potential impacts on paleontological resources. If resources are identified during construction, work will stop within 100 feet of the resource until the resource can be evaluated and the recommendations of the paleontologist followed. Prior to issuance of grading permits that would allow for boring in bedrock, the approving local jurisdiction will review the report and findings to confirm no paleontological resources would be affected.

Findings after Mitigation

Implementation of Mitigation Measure 3.6-1 would reduce the potential for the proposed project to directly or indirectly destroy a paleontological resource by requiring that a paleontologist assess the potential for paleontological resources to occur in a geologic unit that would be disturbed by construction. If there is a potential for resources to exist, a paleontological monitor would be present during construction and would stop work if a resource is encountered until it can be evaluated. All recommendations from the paleontologist would be followed to protect the resource. Compliance with this mitigation measure would reduce the impact of the proposed project related to the destruction of a paleontological resource to a less-than-significant level. However, SACOG cannot require the implementing agency to adopt this mitigation measure, and it is ultimately the responsibility of the implementing agency to determine and adopt project-specific mitigation.

Therefore, this impact would be significant and unavoidable for purposes of this program-level review because SACOG does not have authority to require the implementing agencies to adopt the identified mitigation measures; the mitigation measures are within the responsibility and jurisdiction of another public agency. However, implementation of the mitigation measure identified above or other comparable measures identified by the lead agency at a project level would reduce the impacts to unique paleontological resources, and agencies with jurisdiction to adopt these measures should do so (PRC Section 21081(a)(1), (2).)

7. Greenhouse Gas Emissions and Energy

Impact 3.7-1: Conflict with the SB 375 GHG Emissions Reduction Targets

This impact is analyzed for adverse effects of Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 3.7-16 through 3.7-18 of the Draft EIR.

Significance before Mitigation

As described in Chapter 2 of this Draft EIR, the combination of the land use and transportation projects, along with expansion of existing programs that reduce GHG such as bike- and scooter-share, transportation demand management programs, car sharing, and local electric vehicle infrastructure and incentives would put the region in a position to achieve the per capita GHG reduction target. CARB must ultimately review and approve SACOG's GHG calculation methodology and confirm that the GHG reduction strategies would achieve the GHG reductions. If the SCS does not achieve the GHG emission targets set by CARB, an alternative planning strategy (APS) must be prepared to demonstrate how the targets could be achieved. SACOG would implement the 2025 Blueprint in a manner that is consistent with the SCS process, including the preparation of an APS, if required by CARB. Therefore, the 2025 Blueprint would not conflict with the SB 375 emissions reduction targets. Either CARB would ultimately confirm that the 2025 Blueprint meets the SB 375 reduction requirements or SACOG would be required to demonstrate through an APS that the 2025 Blueprint is on track to achieve the SB 375 GHG emissions reduction target. This impact would be **less than significant**.

The less-than-significant impact determination is confirmed by the Board of Directors based on the evidence and analysis provided in the record.

Impact 3.7-2: Be Inconsistent with the State's Ability to Achieve the 2030 Reduction Target of SB 32 and Carbon Neutrality by 2045, Consistent with AB 1279

This impact is analyzed for adverse effects of Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 3.7-18 through 3.7-22 of the Draft EIR.

Significance before Mitigation

Collectively, SACOG funding programs have supported projects that reduce VMT and GHG emissions by building transportation infrastructure or campaigns/programs to incentivize infill development, connecting people to community destinations with walking and biking facilities, reducing transportation-related emissions, and exploring new options to decrease VMT. Through competitive distribution, SACOG is able to advance the projects and programs that best implement the 2025 Blueprint.

Nonetheless, given the evidence put forth by CARB and in the documents prepared by CARB related to the SB 375 target resetting finalized in March 2018, more must be done to reduce emissions from the transportation sector to achieve the state's climate goals. Therefore, compliance with the reduction goals set forth by SB 375 is not sufficient to achieve the State's near-term GHG reduction goals outlined in the 2022 Scoping Plan (i.e., 40 percent below 1990 emissions by 2030 [SB 32] and Statewide carbon neutrality by 2045 [AB 1279]). Thus, this impact would be **significant**.

Mitigation

- Implement Mitigation Measure 3.16-1: Implement VMT Reduction Strategies

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

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

Findings after Mitigation

Mitigation Measure 3.16-1 has the potential to assist SACOG in achieving higher VMT reductions through new or expanded technologies, methods, measures, and programs; however, the efficacy or feasibility of such technologies, methods, measures, and programs are unknown at this time and beyond the scope of SACOG's authority to control. Mitigation Measure 3.7-1 would further reduce VMT emissions in addition to reductions from other sectors (i.e., energy, area, water, and waste). SACOG's support of local climate change reduction measures would be consistent with guidance in the 2022 Scoping Plan, which indicates that local and regional GHG reduction efforts are necessary for the state to meet its long-term climate change goals. However, there is no assurance that local jurisdictions would implement the necessary measures to reduce the 2025 Blueprint's fair share GHG inventory to levels consistent with statewide reduction targets. Additionally, SACOG cannot require local implementing agencies to adopt GHG reduction plans or policies.

While Mitigation Measures 3.16-1 and 3.7-1 would reduce GHG emissions throughout the plan area of the 2025 Blueprint, the actual reductions achieved are uncertain at this time. If the implementing agency adopts these mitigation measures, Impact 3.7-2 may be reduced, but not to a less-than-significant level. For projects proposing to streamline environmental review, lead agencies must comply with state guidance on VMT reduction and conduct project-level analysis for each project to analyze whether, based on substantial evidence in the record, the proposed mitigation would reduce the VMT impact to less than significant. However, SACOG cannot require the implementing agency to adopt this mitigation measure, and it is ultimately the responsibility of the implementing agency to determine and adopt project-specific mitigation.

Therefore, Impact 3.7-2 is significant and unavoidable because SACOG does not have authority to require the implementing agencies to adopt the identified mitigation measures; the mitigation measures are within the responsibility and jurisdiction of another public agency. However, implementation of the mitigation measures identified above or other comparable measures identified by the lead agency at a project-level would reduce impacts related conflict with GHG emissions targets and agencies with jurisdiction to adopt these measures can and should do so (PRC Section 21081(a)(1), (2).) Moreover, specific economic, legal, social, technological, or other considerations, make identification of additional mitigation measures infeasible at the plan level.

Impact 3.7-3: Substantially Interfere with Achievement of Applicable Local GHG Reduction Plan Goals or Conflict with or Obstruct a Plan for Renewable Energy or Energy Efficiency

This impact is analyzed for adverse effects of Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 3.7-22 through 3.7-23 of the Draft EIR.

Significance before Mitigation

The 2025 Blueprint relies on the benefits of dense, compact development coupled with an efficient and diversified transportation network. It seeks to reduce overall and per capita energy consumption and related GHG emissions from all sources. These actions would help to reduce GHG emissions associated with changes in land use and transportation systems at both the local and regional level and, thus, could result in beneficial contributions to localized GHG emissions reductions identified in local plans. Therefore, the projected land use pattern and planned transportation improvements in the 2025 Blueprint at the regional level do not conflict with the applicable local GHG reduction plans. This impact would be **less than significant**.

The less-than-significant impact determination is confirmed by the Board of Directors based on the evidence and analysis provided in the record.

Impact 3.7-4: Increase GHG Emissions from Project Construction Activities Resulting from the 2025 Blueprint in a Manner Inconsistent with Achievement of the State's Climate Goals

This impact is analyzed for adverse effects of Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 3.7-23 through 3.7-25 of the Draft EIR.

Significance before Mitigation

Specific project details such as construction phasing and duration, equipment type, crew sizes, and equipment usage are necessary to quantify construction emissions. This data is not available for the development that would occur under the plan. Moreover, the various air districts with jurisdiction over construction emissions in the plan area have different approaches to managing emissions and consistency with local air district regulations may not ensure reduction of emissions in alignment with the state's climate goals. Thus, some projects may result in exceedances of local air district's thresholds for GHG emissions. This impact would be **significant**.

Mitigation

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

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

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

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

- Project proponents of new facilities shall achieve or exceed the enhanced Tier 2 target for nonresidential land uses of recycling or reusing 80 percent of the construction waste as described in Section A5.408 of the 2022 CALGreen Code or in accordance with any update to these requirements in future iterations of the CALGreen Code in place at the time of project construction.
- Project proponents shall require that all diesel-powered, off-road construction equipment meet EPA's Tier 3 or Tier 4 emissions standards as defined in 40 CFR 1039 and comply with the exhaust emission test procedures and provisions of 40 CFR Parts 1065 and 1068. This measure can also be achieved by using battery-electric off-road equipment as it becomes available.
- Project proponents shall implement a program that incentivizes construction workers to carpool, and/or use public transit or electric vehicles to commute to and from the project site.
- Where project-level CEQA analysis determine that individual projects under the 2025 Blueprint would exceed thresholds following the implementation of feasible on-site mitigation, projects may participate in local offset programs, or through a California Air Resources Board (CARB)-accredited carbon offset protocol.
- For projects within PCAPCD's jurisdiction, project applicants should refer to and implement the construction emissions mitigation practices contained within the Placer County Sustainability Plan such as the use of renewable diesel, deployment of battery-electric construction equipment, and electrified jobsite power.

Findings after Mitigation

Mitigation Measure 3.7-2 would serve to mitigate the amount of GHGs emitted during construction of the projected land use pattern and transportation network improvements under the 2025 Blueprint. While it is possible that such measures could reduce GHG impacts such that construction emissions would not exceed local air districts' thresholds, SACOG cannot require or enforce construction mitigation for projects outside of its purview. If the implementing agency adopts these mitigation measures, construction-related impacts under Impact 3.7-4 may be reduced, but not to a less-than-significant level. For projects proposing to streamline environmental review, lead agencies must conduct project-level analysis for each project to analyze whether, based on substantial evidence in the record, the proposed mitigation would reduce the construction-related impact to a less-than-significant level. However, SACOG cannot require the implementing agency to adopt this mitigation measure, and it is ultimately the responsibility of the implementing agency to determine and adopt project-specific mitigation.

Construction-related impacts under Impact 3.7-4 are **significant and unavoidable** because SACOG does not have authority to require the implementing agencies to adopt the identified mitigation measures; the mitigation measures are within the responsibility and jurisdiction of another public agency. However, implementation of the mitigation measures identified above or other comparable measures identified by the lead agency at a project-level would reduce impacts related to construction-generated GHG emissions and agencies with jurisdiction to adopt these measures can and should do so (PRC Section 21081(a)(1), (2).) Moreover, specific economic, legal, social, technological, or other considerations, make identification of additional mitigation measures infeasible at the plan level.

Impact 3.7-5: Result in Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources

This impact is analyzed for adverse effects from Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 3.7-26 through 3.7-28 of the Draft EIR.

Significance before Mitigation

According to Appendix F of the State CEQA Guidelines, the means to achieve the goal of conserving energy include decreasing overall per capita energy consumption, decreasing reliance on oil, and increasing reliance on renewable energy sources. The 2025 Blueprint is designed to reduce VMT, and therefore transportation-related fossil fuel consumption, by facilitating compact development of complete communities in existing cities, towns, and suburbs and through creating a more efficient transportation system by way of transportation infrastructure improvements.

Therefore, energy consumed during construction and operation of the 2025 Blueprint would not be considered wasteful, inefficient, or unnecessary. This impact would be **less than significant.**

The less-than-significant impact determination is confirmed by the Board of Directors based on the evidence and analysis provided in the record.

8. Hazards and Hazardous Materials

Impact 3.8-1: Create a Significant Hazard to the Public or the Environment Through the Routine Transport, Use, or Disposal of Hazardous Materials

This impact is analyzed for adverse effects from Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 3.8-31 through 3.8-34 of the Draft EIR.

Significance before Mitigation

Due to the regulation and oversight described in detail in the Draft EIR, impacts associated with the routine transport, use, or disposal of hazardous materials related to the projected land uses and planned transportation improvements from implementation of the 2025 Blueprint would be **less than significant**.

The less-than-significant impact determination is confirmed by the Board of Directors based on the evidence and analysis provided in the record.

Impact 3.8-2: Create a Significant Hazard to People or the Environment from the Use or Accidental Release or Upset of Hazardous Materials

This impact is analyzed for adverse effects from Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 3.8-34 through 3.8-36 of the Draft EIR.

Significance before Mitigation

The regulation and oversight described in the Draft EIR address the foreseeable upset and accident conditions involving the release of hazardous materials into the environment related to the known and anticipated effects of demolition and grading required to implement the 2025 Blueprint. However, due to the potential for undocumented residual contamination throughout the plan area, this impact would be **potentially significant**.

Mitigation

Mitigation Measure 3.8-1: Conduct Site-Specific Investigation to Characterize the Potential Presence of Hazardous Waste

The project proponent shall perform a records review to determine whether there is existing, permitted use of hazardous materials or documented evidence of hazardous waste contamination on the project site and provide the results of this investigation to the implementing agency.

For any sites that are not listed and do not have the potential for residual hazardous materials as a result of historic land uses, no action is required unless unknown hazards are discovered during development. In that case, the implementing agency shall discontinue development until DTSC, RWQCB, local air district, and/or other responsible agency issues a determination.

For any listed sites or sites that have the potential for residual hazardous materials as a result of historic land uses, project proponents shall prepare a Phase I ESA that meets ASTM standards. If a Phase 1 ESA prepared for a project contains recommendations, those shall be implemented for the project. If a Phase I ESA indicates the presence or likely presence of contamination, the project proponent shall prepare a Phase II ESA. Based on the Phase II ESA recommendations, the project shall implement and meet the standard remediation set forth in the Phase II ESA.

Findings after Mitigation

If hazards are identified before or during construction, State regulations pertaining to remediation would be triggered and Cal/OSHA regulations. Mitigation Measure 3.8-1 would require thorough investigation of all potential development sites to limit the potential for unanticipated discovery of existing contamination during demolition or construction. If an implementing agency adopts this mitigation measure, the impact would be reduced to less than significant. Projects taking advantage of CEQA streamlining provisions of SB 375 (PRC Sections 21155.2 and 21159.28) must apply the mitigation measure described above to address site-specific conditions, resulting in impacts that are less than significant. However, because SACOG cannot require an implementing agency to adopt this mitigation measure, and it is ultimately the responsibility of a lead agency to determine and adopt project-specific mitigation, Impact 3.8-4 would be significant and unavoidable. However, implementation of the mitigation measure identified above or other comparable measure identified by the lead agency at a project-level would reduce the impacts related to development on a site included on a list of hazardous materials sites, and agencies with jurisdiction to adopt these measures can and should do so (PRC Section 21081(a)(1), (2).)

Impact 3.8-3: Emit or Handle Hazardous Materials, Substances, or Waste Within 0.25 Mile of an Existing or Proposed School

This impact is analyzed for adverse effects from Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 3.8-37 through 3.8-39 of the Draft EIR.

Significance before Mitigation

As described in the Draft EIR, due to federal, state, and local regulatory approval and oversight for individual projects within the SACOG region, the regional impacts of hazardous materials use and transport within 0.25 mile of an existing or proposed school would be **less than significant**.

The less-than-significant impact determination is confirmed by the Board of Directors based on the evidence and analysis provided in the record.

Impact 3.8-4: Result in Development on a Site Which is Included on a List of Hazardous Materials Sites Compiled Pursuant to Government Code Section 65962.5 and, as a Result, Create a Significant Hazard to the Public or Environment

This impact is analyzed for adverse effects from Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 3.8-38 through 3.8-39 of the Draft EIR.

Significance before Mitigation

The existing regulatory framework establishes a standard protocol for development of sites listed pursuant to Government Code Section 65962.5 that adequately addresses the potential for development of land use or transportation projects in the 2025 Blueprint to create a substantial hazard to the public or the environment. This impact would be **less than significant**.

The less-than-significant impact determination is confirmed by the Board of Directors based on the evidence and analysis provided in the record.

Impact 3.8-5: Result in a Safety Hazard or Excessive Noise for People Residing or Working in the Plan Area due to a Project Located near a Public Airport or Public Use Airport

This impact is analyzed for adverse effects from Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 3.8-39 through 3.8-41 of the Draft EIR.

Significance before Mitigation

Based on the regulatory environment described in the Draft EIR, regional aviation hazard impacts related to land use pattern or planned transportation improvements from implementation of the 2025 Blueprint would be **less than significant**.

The less-than-significant impact determination is confirmed by the Board of Directors based on the evidence and analysis provided in the record.

Impact 3.8-6: Impair Implementation of, or Physically Interfere with, an Adopted Emergency Response Plan or Emergency Evacuation Plan

This impact is analyzed for adverse effects from Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 3.8-41 through 3.8-42 of the Draft EIR.

Significance before Mitigation

Although the planned land uses and transportation improvements could interfere with emergency response and evacuation during construction, implementing agencies would require compliance with state and local requirements regarding evacuation planning. The 2025 Blueprint is a policy document that does not include any site-specific designs or proposals and does not propose any entitlements for development that would have the potential to impair or conflict with an adopted emergency response or evacuation plan. Any future development projects, including buildout of uses contemplated in the Development Pattern, would be subject to all applicable local regulations, reviews, and requirements pertaining to emergency response, emergency access, and maintaining emergency evacuation routes. For these reasons, regional land use projects, transportation network improvements, and programs planned in the 2025 Blueprint would be required to comply with state, regional-level, and local emergency response and emergency evacuation plans and applicable fire code requirements. Regulatory compliance would ensure that land use and transportation projects would not substantially impair an adopted emergency response plan or emergency evacuation plan. Therefore, regional emergency evacuation plan impacts related to the projected land use pattern and planned transportation improvements from the implementation of the 2025 Blueprint would be **less than significant**.

The less-than-significant impact determination is confirmed by the Board of Directors based on the evidence and analysis provided in the record.

9. Hydrology and Water Quality

Impact 3.9-1: Violate Any Water Quality Standards or Waste Discharge Requirements or Otherwise Substantially Degrade Surface or Groundwater Quality

This impact is analyzed for adverse effects from Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 3.9-30 through 3.9-32 of the Draft EIR.

Significance before Mitigation

Development and transportation improvements occurring under the 2025 Blueprint would be required to comply with existing regulations, such as Clean Water Act Section 303(d), CALGreen, the National Pollutant Discharge Elimination System permitting process, and Caltrans regulations. Compliance with existing regulations would ensure that implementation of the 2025 Blueprint would not violate water quality standards or waste discharge requirements. Impacts on water quality would be **less than significant**.

The less-than-significant impact determination is confirmed by the Board of Directors based on the evidence and analysis provided in the record.

Impact 3.9-2: Substantially Decrease Groundwater Supplies or Interfere with Groundwater Recharge such that the Project May Impede Sustainable Groundwater Management of the Basin

This impact is analyzed for adverse effects from Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 3.9-40 through 3.9-41 of the Draft EIR.

Significance before Mitigation

Growth and development through 2050 would increase impervious surfaces and demand for water. At the regional level, the plan would not interfere with groundwater recharge or decrease groundwater supplies through increased groundwater demand to the degree that sustainable management of any of the 10 basins in the plan area would be impeded. This is due to the magnitude of growth, the nature of anticipated projects (which would be focused in areas that do not contribute to groundwater recharge in baseline conditions), and compliance with established federal, state, and local regulations protecting groundwater recharge. This impact would be **less than significant**.

The less-than-significant impact determination is confirmed by the Board of Directors based on the evidence and analysis provided in the record.

Impact 3.9-3: Substantially Alter the Existing Drainage Pattern such that Erosion, Siltation, Runoff, Flooding, or an Exceedance of the Capacity of Storm Drainage Systems Would Occur

This impact is analyzed for adverse effects from Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 3.9-42 through 3.9-43 of the Draft EIR.

Significance before Mitigation

Compliance with the National Pollution Discharge Elimination System permitting process and CALGreen would minimize the impacts of land use and transportation improvement projects associated with the 2025 Blueprint related to alteration of drainage. Regulatory compliance and evaluation of this adherence on an individual project-by-project basis would ensure that construction and operation of regional growth land use projects and transportation network improvements and programs would not substantially alter the existing drainage pattern of the site or area. This impact would be **less than significant**.

The less-than-significant impact determination is confirmed by the Board of Directors based on the evidence and analysis provided in the record.

Impact 3.9-4: In Flood Hazard or Seiche Zones, Risk Release of Pollutants Due to Project Inundation

This impact is analyzed for adverse effects from Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 3.9-43 through 3.9-44 of the Draft EIR.

Significance before Mitigation

Land uses and transportation facilities in the 2025 Blueprint located within the 100-year or 200-year flood hazard zones, as well as dam inundation zones, would be subject to the safety and design requirements of the Central Valley Flood Protection Plan, California Building Code, and the requirements of individual municipal and county flood control management agencies. Compliance with these regulatory requirements would address the risk of flooding. As a result, the risk of releasing pollutants due to project inundation would be **less than significant**.

The less-than-significant impact determination is confirmed by the Board of Directors based on the evidence and analysis provided in the record.

10. Land Use and Planning

Impact 3.10-1: Physically Divide an Existing Community

This impact is analyzed for adverse effects from Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 3.10-11 through 3.10-12 of the Draft EIR.

Significance before Mitigation

Implementation of the land use strategies would result in future development being integrated into existing communities along the existing transportation network and would, therefore, not physically divide established communities. In addition, many proposed transportation projects, such as expansion of transit services or the building of active transportation infrastructure, are intended to improve mobility and accessibility and may, as a result, improve community connectivity. This impact would be **less than significant**.

The less-than-significant impact determination is confirmed by the Board of Directors based on the evidence and analysis provided in the record.

Impact 3.10-2: Cause a Significant Environmental Impact due to Conflict with the SCS Requirements of SB 375

This impact is analyzed for adverse effects from Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 3.10-13 through 3.10-23 of the Draft EIR.

Significance before Mitigation

The 2025 Blueprint complies with all eight of the SB 375 objectives. Therefore, the 2025 Blueprint would not cause a significant environmental impact due to a conflict with the SCS requirements included in SB 375. This impact would be **less than significant**.

The less-than-significant impact determination is confirmed by the Board of Directors based on the evidence and analysis provided in the record.

Impact 3.10-3: Cause a Significant Environmental Impact due to Conflict with the Provisions of the Delta Plan or the LURMP

This impact is analyzed for adverse effects from Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 3.10-23 through 3.10-25 of the Draft EIR.

Significance before Mitigation

As described in the Draft EIR, the 2025 Blueprint identifies growth geographies in the Delta Secondary Zone that are consistent with adopted land use plans and does not include transportation projects that would promote further urbanization of the Delta. The 2025 Blueprint is consistent with the goals of the Land Use and Resource Management Plan and policies of the Delta Plan. This impact would be **less than significant**.

The less-than-significant impact determination is confirmed by the Board of Directors based on the evidence and analysis provided in the record.

11. Mineral Resources

Impact 3.11-1: Result in the Loss of Availability of a Known Mineral Resource that Would Be of Value to the Region and the Residents of the State or Result in the Loss of Availability of a Locally Important Mineral Resource Recovery Site Delineated on a Local General Plan, Specific Plan, or Other Land Use Plan

This impact is analyzed for adverse effects from Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 3.11-5 through 3.11-7 of the Draft EIR.

Significance before Mitigation

As described in the Draft EIR, most growth would occur in developed areas where the potential for mineral resource extraction is unlikely, and new development projects would be required to comply with local planning documents which require the consideration of mineral resource zones. Therefore, the potential for loss of availability of a designated mineral resource of value to the region, or the loss of availability of a locally important mineral resource recovery site related to the Development Pattern and planned transportation improvements from implementation of the 2025 Blueprint at the regional level would be **less than significant**.

The less-than-significant impact determination is confirmed by the Board of Directors based on the evidence and analysis provided in the record.

12. Noise and Vibration

Impact 3.12-1: Result in Temporary Noise Levels in the Vicinity of the Project that Exceed FTA Recommended Standards or Generate a Substantial Temporary Increase in Ambient Noise Levels

This impact is analyzed for adverse effects from Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 3.12-14 through 3.12-18 of the Draft EIR.

Significance before Mitigation

Construction of land development and transportation network projects proposed by the 2025 Blueprint has the potential to result in noise levels that exceed Federal Transit Administration (FTA) standards and generate substantial increases in noise such that nearby sensitive receptors could be adversely affected. For these reasons, this impact would be **significant**.

Mitigation

Mitigation Measure 3.12-1: Employ Measures to Reduce Construction Noise

To reduce construction noise levels, implementing agencies shall implement measures, where applicable and necessary based on project- and site-specific considerations, that include those (or equally effective measures) identified below:

- Notify residents and occupants within 252 feet of the project construction area at least 30 days in advance of anticipated times when construction noise levels are anticipated to exceed evening or nighttime noise limits established in the noise element of the general plan or noise ordinance.
- Designate an on-site construction compliance and enforcement manager for the project.
- Post procedures and phone numbers at the construction site for notifying the implementing agency staff and construction contractor (during regular construction hours and off-hours), along with permitted construction days and hours, complaint procedures, and who to notify in the event of a problem.

- All stationary construction equipment (e.g., generators, compressors, cement mixers) and staging areas shall be located as far as possible from nearby noise-sensitive land uses, and/or located to the extent feasible such that an existing or constructed noise attenuating feature (e.g., temporary noise wall or blanket) block the line-of-site between affected noise-sensitive land uses and construction staging areas.
- Prohibit the idling of construction equipment for extended periods of time in the vicinity of sensitive receptors.
- All construction equipment shall be properly maintained and equipped with noise-reduction intake and exhaust mufflers and engine shrouds, in accordance with manufacturer recommendations. Equipment engine shrouds shall be closed during equipment operation.
- For construction activity that would occur within a clear line-of-sight of an adjacent offsite sensitive receptor (as defined by the local jurisdiction), take place outside of hours during which construction activity is exempt from local noise standards, and exceed applicable construction noise standards or thresholds, the construction contractor shall install temporary sound barriers to attenuate noise, such as temporary noise curtains, sound walls, or similar products that provide a barrier to construction noise. The temporary sound barrier shall be located between the project construction noise sources and receptors to shield the receptors from construction noise. When installed properly, acoustic barriers can reduce construction noise levels by approximately 8-10 dB (EPA 1971). The installation of any temporary shall meet all the following criteria:
  - be installed as close as feasible to the boundary of the construction site within the direct line of sight path of the nearby sensitive receptor(s);
  - consist of durable, flexible composite material featuring a noise barrier layer bound to sound-absorptive material on one side; and
  - consist of rugged, impervious material with a surface weight of at least one pound per square foot, such that a minimum of 10 dBA reduction is achieved on the receiving side of the sound barrier.

Mitigation Measure 3.12-2: Employ Measures to Reduce Construction Noise

To achieve compliance with the applicable construction noise standards of the relevant jurisdiction within the plan area, implementing agencies shall require the construction contractor(s) to comply with local construction-related noise standards and policies established in the most recent general plan or local ordinances, including restricting construction activities to permitted hours as defined under local jurisdiction regulations, unless otherwise necessary.

Findings after Mitigation

Implementation of Mitigation Measure 3.12-1 would provide reductions in daytime and nighttime construction noise levels by ensuring proper equipment use, locating equipment away from sensitive land uses, and requiring the use of enclosures. Implementation of these noise-reduction features would reduce construction noise levels by approximately 10 decibels or more. Greater reductions may be achieved and the frequency and intensity of construction-related noise at nearby receptors may be further reduced, depending on actual construction activities and proximity to receptors. In addition, compliance with local construction noise standards would typically limit construction to less sensitive hours of the day and could further reduce the effects of construction noise. However, there could be instances where noise level reductions from implementation of mitigation and compliance with local standards and ordinances would not be sufficient to reduce noise to an acceptable level. For these reasons, construction-related noise associated with the 2025 Blueprint could exceed applicable thresholds and result in a substantial temporary increase in noise.

Projects taking advantage of CEQA Streamlining provisions of SB 375 (PRC Sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measure described above to address site-specific conditions, resulting in impacts that are less than significant. However, because SACOG cannot require the implementing agency to adopt this mitigation measure, and it is ultimately the responsibility of the lead agency to determine and adopt project-specific mitigation, this impact would be significant and unavoidable. Implementation of the mitigation measures identified above or other comparable measure identified by the lead agency at the project level would reduce the impacts from noise, and agencies with jurisdiction to adopt these measures can and should do so (PRC Section 21081(a), (1).) Moreover, specific economic, legal, social, technological, or other considerations, make identification of additional mitigation measures infeasible at the plan level.

Impact 3.12-2: Result in Traffic Noise Levels that Exceed the Community Type Thresholds Identified in Table 3.12-5 or Permanent Stationary Noise Levels in the Vicinity of the Project in Excess of Standards Established in the Local General Plan or Noise Ordinance, or Applicable Standards of Other Agencies

This impact is analyzed for adverse effects from Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 3.12-18 through 3.12-26 of the Draft EIR.

Significance before Mitigation

Implementation of the 2025 Blueprint could result in regional noise increases and localized noise levels that exceed applicable thresholds and result in a substantial permanent increase in noise. Due to the anticipated noise increases and the potential for exposure of new and existing sensitive receptors to noise that exceeds applicable thresholds, this impact would be **significant**.

Mitigation

Mitigation Measure 3.12-2: Employ Measures to Reduce Traffic Noise

For projects that have not undergone a previous noise study and that exceed applicable noise thresholds, the implementing agency shall require a project-level evaluation of noise impacts in accordance with applicable federal, State, and local noise standards. To reduce exposure from traffic noise when significant impacts are identified, implementing agencies and/or project sponsors shall implement measures, where feasible and necessary based on project- and site-specific considerations to achieve noise levels in accordance with applicable local noise standards. Measures shall include those identified below (or other equally effective measures):

- Design adjustments to proposed roadway or transit alignments to reduce noise levels in noise-sensitive areas (e.g., below-grade roadway alignments can effectively reduce noise levels in nearby areas by providing a barrier between the source and receptor).
- Use traffic-calming measures in the design of transportation improvements.
- Use rubberized asphalt or "quiet pavement" to reduce road noise for new roadway segments, roadways in which widening or other modifications require re-pavement, or normal reconstruction of roadways where re-pavement is planned.
- Maximize the distance between existing noise-sensitive land uses and new noise-generating facilities and transportation systems.
- Construct barriers in the form of outdoor barriers, sound walls, buildings, or earth berms to attenuate noise at adjacent sensitive uses if in compliance with local ordinances or policies.
- Monitor the effectiveness of noise reduction measures by taking noise measurements and installing adaptive mitigation measures to achieve the standards for ambient noise levels established by the noise element of the general plan or noise ordinance.

Mitigation Measure 3.12-3: Employ Measures to Reduce Stationary Noise from New Land Use Projects

To reduce the exposure of existing sensitive receptors to non-transportation noise associated with projected development, implementing agencies and/or project sponsors shall require, for projects with features that generate stationary noise that are near sensitive receptors, a project-level evaluation of noise impacts in accordance with applicable federal, state, and local noise standards. Where significant impacts are identified, applicable mitigation measures shall be implemented to reduce noise to achieve noise levels in accordance with applicable local noise standards. Where feasible and necessary to address site-specific impacts, measures shall be implemented and shall include, but are not limited to, the following:

- maximize the distance between noise-sensitive land uses and new noise-generating facilities;
- improve the acoustical insulation, window quality, and/or other soundproofing of dwelling units (existing or proposed) where setbacks do not sufficiently reduce noise; and
- incorporate noise-reduction features to reduce the average hourly exterior operational noise levels of mechanical equipment at nearby noise-sensitive land uses in compliance with local standards. Noise-reduction measures to be incorporated may include, but are not limited to, setbacks, the selection of alternative or lower noise-generating equipment, relocation of equipment, and use of equipment enclosures.

Mitigation Measure 3.12-4: Reduce Exposure of New Sensitive Receptors to Transportation and Stationary Noise

To prevent future noise sensitive receptors from exposure to excessive noise levels, prior to project approval, project proponents of a sensitive land use shall provide the local jurisdiction with a site-specific noise assessment prepared by a qualified acoustical professional that addresses interior and exterior noise levels at the proposed sensitive land use. The noise assessment shall consider existing noise sources adjacent to the proposed residential structure. If the proposed structure is located within an area with noise levels that exceed applicable noise thresholds for residential land uses, the noise assessment shall confirm, using approved calculation methodologies, that site design and building design are sufficient to comply with applicable interior noise standards. If the assessment shows that such standards would not be met with the design as proposed, the project proponent shall implement recommendations of the assessment that are shown to achieve applicable standards.

Findings after Mitigation

Implementation of Mitigation Measure 3.12-2 would result in substantial reductions in traffic-related noise through design techniques, the use of specific materials (i.e., rubberized asphalt), and construction of noise barriers depending on site-specific conditions. Implementation of Mitigation Measure 3.12-3 would require planning, design, and operational measures to reduce stationary noise sources and to comply with any applicable local noise codes. Mitigation Measure 3.12-4 would reduce the exposure of new sensitive receptors to transportation and stationary noise through site-specific noise assessments. If the implementing agency adopts these mitigation measures, Impact 3.12-2 could be reduced to a less than significant level. Projects taking advantage of CEQA Streamlining provisions of SB 375 (PRC Sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures described above to address site-specific conditions, resulting in impacts that are less than significant. However, because SACOG cannot require the implementing agency to adopt this mitigation measure, and it is ultimately the responsibility of a lead agency to determine and adopt project-specific mitigation, this impact would be significant and unavoidable. Implementation of the above listed mitigation measures or other comparable measures identified by the lead agency at a project level would reduce the impacts from noise, and agencies with jurisdiction to adopt these measures can and should do so (PRC Section 21081(a)(1), (2).)

Impact 3.12-3: Generate Excessive Groundborne Vibration or Groundborne Noise Levels

This impact is analyzed for adverse effects from Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 3.12-27 through 3.12-31 of the Draft EIR.

Significance before Mitigation

Construction of the 2025 Blueprint could generate substantial vibration levels. Pile driving could be required for the construction of multi-story buildings (e.g., apartment buildings) and for bridge repair. Because the exact construction details for land use development projects associated with the 2025 Blueprint are currently unknown, the potential exists for pile driving to occur within 48 feet of an existing historical structure or older building and within 545 feet of an existing sensitive land use, thus exceeding the recommended thresholds for structural damage (i.e., 0.25 in/sec PPV) and human response (i.e., 72 VdB), respectively. In addition, more typical construction equipment (e.g., vibratory roller) could exceed the thresholds for structural damage and human response with 23 feet and 136 feet, respectively. The types of new land use development included in the plan do not typically produce noticeable levels of vibration once operational. In addition, land use development would be in accordance with local plans and zoning ordinances in the project area which typically prohibit vibration-intensive land uses in proximity to vibration-sensitive land uses. However, new and expanded transportation infrastructure (i.e., buses, expanded light rail transit) could result in new vibration sources and substantial increases in vibration depending on the proximity to existing sensitive land uses. For these reasons, this impact would be **significant**.

Mitigation

Mitigation Measure 3.12-5: Employ Measures to Reduce Construction Vibration

To reduce construction vibration levels to acceptable levels (i.e., 65 VdB to 80 VdB depending on frequency of event and 0.1 to 0.5 in/sec PPV depending on building type), implementing agencies and/or project sponsors shall implement measures, where feasible and necessary based on project- and site-specific considerations, that include those identified below:

- To minimize disturbance of sensitive receptors (as defined within a local ordinance or general plan) within 545 feet of impact pile-driving activities, implement "quiet" pile-driving technology (such as predrilling of piles and the use of more than one pile driver to shorten the total pile driving duration), where feasible, in consideration of geotechnical and structural requirements and conditions.
- To reduce structural damage, where pile driving is proposed within 48 feet of an existing historical structure, engage a qualified geotechnical engineer and qualified historic preservation professional (for designated historic buildings only) and/or structural engineer to conduct a preconstruction assessment of existing subsurface conditions and the structural integrity of nearby (i.e., within 48 feet) structures that would be exposed to pile-driving activity. If recommended by the preconstruction assessment, for structures or facilities within the impact distance (e.g., 48 feet) of pile-driving activities, the project sponsor shall require ground vibration monitoring of nearby reinforced-concrete, steel, or timber structures. Such methods and technologies shall be based on the specific conditions at the construction site. Conditions will be determined through activities such as the preconstruction surveying of potentially affected historic structures and underpinning of foundations of potentially affected structures, as necessary. The preconstruction assessment shall include a monitoring program to detect ground settlement or lateral movement of structures in the vicinity of pile-driving activities and identify corrective measures to be taken should monitored vibration levels indicate the potential for building damage. In the event of unacceptable ground movement with the potential to cause structural damage, all impact work shall cease, and corrective measures shall be implemented to minimize the risk to the subject, or adjacent, historic structure.
- Restrict construction activities to permitted hours in accordance with local jurisdiction regulations.

Mitigation Measure 3.12-6: Implement Measures to Reduce Operational Vibration from New and Expanded Rail Systems

Project proponents proposing new or expanded rail systems shall undertake a detailed evaluation of vibration and groundborne noise impacts and identify project-specific mitigation measures as necessary to reduce vibration to a level that complies with applicable local standards or FTA standards. To address site-specific conditions to minimize the effects of vibration and groundborne noise from rail operations, the following measures shall be implemented where feasible and necessary:

- complying with all applicable local vibration and groundborne noise standards, or in the absence of such local standards, comply with FTA vibration and groundborne noise standards;
- maximizing the distance between tracks and sensitive uses;
- conducting wheel truing to re-contour wheels to provide a smooth-running surface and removing wheel flats;
- providing special track support systems such as floating slabs, resiliently supported ties, high resilience fasteners, and ballast mats; and
- implementing operational changes such as limiting train speed and reducing nighttime operations.

Findings after Mitigation

Implementation of Mitigation Measures 3.12-5 would reduce vibration impacts associated with construction by requiring the use of quieter pile-driving technology and ensuring that proper actions are taken to minimize vibration impacts to adjacent structures during construction. Mitigation Measure 3.12-6 would minimize vibration and groundborne noise associated with new and expanded rail systems and operations. If the implementing agency adopts these mitigation measures, Impact 3.12-3 could be reduced to less than significant. Projects taking advantage of CEQA Streamlining provisions of SB 375 (PRC Sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures described above to address site-specific conditions, resulting in impacts that are less than significant. However, because SACOG cannot require the implementing agency to adopt these mitigation measures, and it is ultimately the responsibility of a lead agency to determine and adopt project-specific mitigation, this impact would be significant and unavoidable. Implementation of the mitigation measures listed above or other comparable measures identified by the lead agency at a project level would reduce the impacts from vibration and groundborne noise, and agencies with jurisdiction to adopt these measures can and should do so (PRC Section 21081(a)(1), (2).)

13. Population, Employment, and Housing

Impact 3.13-1: Induce Substantial Unplanned Population Growth in an Area, either Directly or Indirectly; and/or Displace Substantial Numbers of Existing People or Housing, Necessitating the Construction of Replacement Housing Elsewhere

This impact is analyzed for adverse effects from Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 3.13-10 through 3.13-12 of the Draft EIR.

Significance before Mitigation

Improvements associated with the 2025 Blueprint would be focused in developed areas where growth is anticipated and would avoid unplanned population growth and the displacement of existing residents. Therefore, the 2025 Blueprint would not result in the potential for regional impacts associated with displacement of substantial numbers of people or housing that results in construction of replacement housing elsewhere. Furthermore, the 2025 Blueprint would not result in the potential for substantial induced unplanned population growth in an area, either directly or indirectly. Since the 2025 Blueprint is expressly designed to avoid this impact, this impact would be **less than significant**.

The less-than-significant impact determination is confirmed by the Board of Directors based on the evidence and analysis provided in the record.

14. Public Services

Impact 3.14-1: Result in Substantial Adverse Physical Environmental Impacts Associated with the Provision of New or Physically Altered Governmental Facilities in order to Maintain Acceptable Service Ratios, Response Times or Other Performance Objectives for Fire Protection, Police Protection, Schools, Libraries, Social Services, and/or Other Public Services

This impact is analyzed for adverse effects from Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 3.14-16 through 3.14-18 of the Draft EIR.

Significance before Mitigation

Because the population is forecasted to increase under the 2025 Blueprint, it is possible that implementation of the 2025 Blueprint would result in increased demand for public services that would require additional or expanded facilities to maintain acceptable service levels. During project planning, design, and project-level environmental review, implementing agencies would ensure that adequate public services would be available to maintain acceptable service levels. This would be documented prior to project approval in the form of a capacity analysis, provider will-serve letter, or equivalent documentation. Although implementation of the 2025 Blueprint would improve regional transportation, police, fire, and other emergency response times could be longer in 2050 as compared to baseline conditions. This could lead to the need for new or expanded public services, which may have a physical impact on the environment. Although these facilities would generally be located within the areas of growth evaluated in this plan (because they are located near the populations they serve), local jurisdictions would site facilities in coordination with the service providers based on multiple factors (including land availability, service area, and the condition of existing facilities). Therefore, new or expanded facilities may be located outside of areas identified for development in this plan. The impact of the implementation of the 2025 Blueprint would be **potentially significant**.

Mitigation

Mitigation Measure 3.14-1: Require Provision of Adequate Public Services

During project planning, design, and project-level environmental review, implementing agencies shall ensure that adequate public services are available. This shall be documented prior to project approval in the form of a capacity analysis approved by the various applicable districts.

Findings after Mitigation

As described above, the forecast of growth in population, employment, and households that is anticipated in the SACOG region through 2050 would result in increased demand for public services. These services would generally be provided by existing or expanded facilities in Center and Corridor Communities and Existing Communities and new facilities included as part of the master plans for Developing Communities. It is assumed that the majority of the new facilities would occur in areas where the environmental impacts of growth have been evaluated in this Draft EIR. However, because there are many factors considered in the location of new facilities and SACOG does not have land use authority to influence decisions about facility siting, some facilities could be located outside of the regional growth pattern that has been evaluated. SACOG has no indication of where such development would occur; however, in these cases, implementation of Mitigation Measure 3.14-1 could result in additional effects on the environment due to the construction of these facilities. This may include the impacts of ground disturbance to air quality, hazardous materials, and cultural resources during construction as well as aesthetic and transportation impacts during operation.

Mitigation Measure 3.14-1 would ensure adequate provision of public services. However, this mitigation does not address the potential for the facilities required to ensure adequate public services to result in substantial adverse physical environmental impacts. Additionally, SACOG cannot require the implementing agency to adopt this mitigation measure. It is ultimately the responsibility of the implementing agency to determine appropriate service levels and adopt project-specific mitigation, as applicable. Therefore, this impact would be significant and unavoidable for purposes of this program-level review. However, implementation of the mitigation measure listed above or other comparable measures identified by the lead agency at a project level would reduce the impacts related to provision of adequate public services, and agencies with jurisdiction to adopt these measures should do so (PRC Section 21081(a)(1), (2).) Moreover, specific economic, legal, social, technological, or other considerations, make identification of additional mitigation measures infeasible at the plan level.

15. Recreation

Impact 3.15-1: Increase the Use of Existing Neighborhood and Regional Parks or Other Recreational Facilities such that Substantial Physical Deterioration of the Facility Could Occur or be Accelerated

This impact is analyzed for adverse effects from Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 3.15-17 through 3.15-18 of the Draft EIR.

Significance before Mitigation

As described above, the population growth forecast through 2050 would be directed towards existing communities. For this reason, it is possible that implementation of the 2025 Blueprint would result in increased demand for parks and recreational facilities that impedes achievement of acceptable service levels. Transportation improvements—including expanded bicycle and pedestrian facilities—included in the 2025 Blueprint would enhance the overall efficiency of the regional transportation system and would enhance overall community connectivity. This could lead to increased use of existing local and regional park and recreation facilities but would also make it easier for residents to divert trips away from facilities that would otherwise experience higher visitation levels that could potentially cause or accelerate physical wear and deterioration.

In the case that service-level standards of parks and recreational facilities are not met, substantial physical deterioration of parks and recreation facilities in the plan area could occur or be accelerated. During project planning, design, and project-level environmental review, local implementing agencies routinely check for, and require, adequate service levels for parks according to parks and recreation master plans, local codes, and ordinances and in coordination with the appropriate parks district(s). Through these established processes, the planning departments of local implementing agencies have a vested authority to address the potential for physical deterioration of recreational facilities at the project level. However, because level of service standards may not be achievable at the project level and implementing agencies have the ability to approve projects that do not meet level of service standards, the degradation of quality of recreational facilities would be a **potentially significant** impact.

Mitigation

Mitigation Measure 3.15-1: Require Provision of Adequate Park Facilities

During project planning, design, and project-level environmental review, implementing agencies shall ensure that adequate park services are achieved. This shall be documented prior to project approval in the form of a capacity analysis approved by the applicable parks district.

Findings after Mitigation

If implemented, Mitigation Measure 3.15-1 would ensure that park facilities are provided for each new development so that regional growth does not contribute to the physical deterioration of existing parks. However, due to the limited land available in some Center and Corridor Communities, this mitigation measure may not be feasible for all projects in the plan area. Additionally, SACOG cannot require the implementing agency to adopt this mitigation measure, and it is ultimately the responsibility of a lead agency to determine and adopt project-specific mitigation. Because SACOG does not have authority over implementing agencies, and resident-to-acre standards are not always achievable for infill development, this impact would be significant and unavoidable. However, implementation of the listed above mitigation measure or other comparable measures identified by the lead agency at a project level would reduce the impacts related to deterioration of recreational facilities, and agencies with jurisdiction to adopt these measures should do so (PRC Section 21081(a)(1), (2).) Moreover, specific economic, legal, social, technological, or other considerations, make identification of additional mitigation measures infeasible at the plan level.

Impact 3.15-2: Include Recreation Facilities or Require the Construction or Expansion of Recreation Facilities that might have an Adverse Physical Effect on the Environment

This impact is analyzed for adverse effects from Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 3.15-18 through 3.15-19 of the Draft EIR.

Significance Before Mitigation

Parks and recreation areas would be developed within the areas identified for growth, as residential developments indicated in the 2025 Blueprint would need to identify land for parks or pay in-lieu fees, as part of their entitlements. Park and recreation development is within the scope of the overall Development Pattern evaluated throughout this

Draft EIR. Therefore, the implementation of the 2025 Blueprint as it relates to the physical environmental effects of new or expanded recreational facilities would be **less than significant**.

The less-than-significant impact determination is confirmed by the Board of Directors based on the evidence and analysis provided in the record.

16. Transportation

Impact 3.16-1: Conflict with a Program, Plan, Ordinance, or Policy Addressing the Circulation System, including Transit, Roadway, Bicycle, and Pedestrian Facilities

This impact is analyzed for adverse effects from Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 3.16-35 through 3.16-39 of the Draft EIR.

Significance before Mitigation

The 2025 Blueprint is not expected to conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Therefore, this impact would be **less than significant**.

The less-than-significant impact determination is confirmed by the Board of Directors based on the evidence and analysis provided in the record.

Impact 3.16-2: Result in a Change in per Capita VMT that is Inconsistent with CARB's 2022 Scoping Plan

This impact is analyzed for adverse effects from Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 3.16-39 through 3.16-46 of the Draft EIR.

Significance before Mitigation

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

Mitigation

Mitigation Measure 3.16-1: Implement VMT Reduction Strategies

The State recognized that additional State policy actions and funding would be required to close the VMT gap between what the MPOs could achieve through implementation of their SCSs and reductions needed to meet State goals (CARB 2022c). Though the State must initiate these additional actions and funding programs, the exact form of the policies and funding programs must be collaboratively developed with input from MPOs, local agencies, and other organizations to ensure they provide the tools and incentives necessary to go beyond the SCSs in reducing VMT. SACOG shall be an active participant in this process to develop and explore pathways to implement State-level VMT reduction strategies, such as those outlined in Appendix C (2022 Scoping Plan) through a transparent and inclusive interagency policy development process to evaluate and identify implementation pathways for additional policies to reduce VMT and promote sustainable communities. SACOG developed the “Green Means Go” program as part of the 2020 MTP/SCS, which SACOG shall continue to implement this pilot for some of the infill incentives and support for transit and innovative mobility that are envisioned in the 2022 Scoping Plan as key elements of filling that VMT gap.

In addition, implementing agencies shall comply with State guidance on VMT reduction, which may be achieved by implementation of the following:

- Implementing agencies shall require project modifications during the project design and environmental review stage of project development that would reduce VMT effects in a manner consistent with state guidance on VMT reduction. For roadway capacity expansion projects, this would include but is not limited to demand management through transportation systems management and operations (TSMO) including the use of pricing. Other project modifications may include, but are not limited to:
    - improve or increase access to transit;
    - increase access to common goods and services, such as groceries, schools, and daycare;
    - incorporate affordable housing into the project;
    - incorporate neighborhood electric vehicle network;
    - orient the project toward transit, bicycle, and pedestrian facilities;
    - improve pedestrian or bicycle networks, or transit service;
    - provide traffic calming;
    - provide bicycle parking;
    - limit or eliminate parking supply;
    - unbundle parking costs;
    - provide parking cash-out programs;
    - implement roadway pricing;
    - implement or provide access to a commute reduction program;
    - provide car-sharing, bike sharing, and ride-sharing programs;
    - provide transit passes;
    - shift single occupancy vehicle trips to carpooling or vanpooling, for example providing ride-matching services;
    - provide telework options;
    - provide incentives or subsidies that increase the use of modes other than single-occupancy vehicles;
    - provide on-site amenities at places of work, such as priority parking for carpools and vanpools, secure bike parking, and showers and locker rooms;
    - provide employee transportation coordinators at employment sites;
    - provide a guaranteed ride home service to users of non-auto modes;
    - locate the project in an area of the region that already exhibits low VMT;
    - locate the project near transit;
    - increase project density;
    - increase the mix of uses within the project or within the project’s surroundings;

- increase connectivity and/or intersection density on the project site; and/or
- deploy management strategies (e.g., pricing, vehicle occupancy requirements) on roadways or roadway lanes.

- Implementing agencies shall require implementation of VMT reduction strategies through transportation demand management programs, impact fee programs, mitigation banks or exchange programs, in-lieu fee programs, or other land use project conditions that reduce VMT in a manner consistent with state guidance on VMT reduction. Programs should be designed to reduce VMT from existing land uses, where feasible, and from new discretionary residential or employment land use projects. Project conditions should be reserved for situations where programs are not feasible. The design of programs and project conditions should focus on VMT reduction strategies that increase travel choices and improve the comfort and convenience of sharing rides in private vehicles, using public transit, riding bicycles/scooters, or walking.

Findings after Mitigation

If the implementing agency adopts this mitigation measure, Impact 3.16-2 would be reduced in some communities, although additional State policy actions and funding would be required to close the gap at the state level and the impact would remain significant. The strategies identified are programmatic; they would need to be refined and matched to local conditions in any subsequent project level environmental analysis. For projects proposing to streamline environmental review, lead agencies must comply with State guidance on VMT reduction and conduct project-level analysis for each project to analyze whether, based on substantial evidence in the record, the proposed mitigation would reduce the VMT impact to less than significant. However, SACOG cannot require the implementing agency to adopt this mitigation measure, and it is ultimately the responsibility of the implementing agency to determine and adopt project-specific mitigation. Therefore, this impact would be significant and unavoidable for purposes of this program-level review. However, implementation of the mitigation measure listed above or other comparable measure identified by the lead agency would reduce VMT impacts and local agencies with jurisdiction to adopt these measures can and should do so (PRC Section 21081(a)(1), (2).) Moreover, specific economic, legal, social, technological, or other considerations, make identification of additional mitigation measures infeasible at the plan level.

Impact 3.16-3: Substantially Increase Hazards due to a Geometric Design Feature or Incompatible Uses

This impact is analyzed for adverse effects from Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 3.16-46 through 3.16-47 of the Draft EIR.

Significance before Mitigation

The 2025 Blueprint is not expected to adversely affect the design of transportation facilities. Rather, investments are expected to incentivize design improvements to make transportation facilities and infrastructure safer. Therefore, the potential of the 2025 Blueprint to substantially increase hazards due to geometric design features or incompatible uses would be **less than significant**.

The less-than-significant impact determination is confirmed by the Board of Directors based on the evidence and analysis provided in the record.

Impact 3.16-4: Result in Inadequate Emergency Access

This impact is analyzed for adverse effects on Regional Growth and Land Use Change and Transportation Network Improvements and Programs on page 3.16-47 of the Draft EIR.

Significance before Mitigation

While implementation of the 2025 Blueprint Development Pattern and transportation projects could temporarily impede emergency access at those project locations during construction periods, construction projects must conform to local regulations requiring maintenance of emergency access during construction. Additionally, projects developed under the 2025 Blueprint would be required to comply with State and local fire code standards related to emergency access. Improved roadways are anticipated to facilitate emergency access. Therefore, impacts on emergency access would be **less than significant**.

The less-than-significant impact determination is confirmed by the Board of Directors based on the evidence and analysis provided in the record.

17. Tribal Cultural Resources

This impact is analyzed for adverse effects from Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 3.17-10 through 3.17-13 of the Draft EIR.

Significance before Mitigation

State laws require consultation with culturally affiliated tribes through the AB 52 process and establish procedures for the unanticipated discovery of Native American burials through the California Native American Historical, Cultural, and Sacred Sites Act. Although these regulations would reduce the severity of the effects, there could be a substantial adverse change in the significance of a tribal cultural resource because disturbance and destruction of the resource may still occur prior to discovery of burials during the construction of projects. Together, the potential impacts on tribal cultural resources that could result from regional growth and the transportation projects in the 2025 Blueprint include substantial alteration or removal of a tribal cultural resource and indirect regional impacts from access-related damage. This impact would be **potentially significant**.

Mitigation Measures

Mitigation Measure 3.17-1: Prepare and Implement a Worker Awareness Training Program for Tribal Cultural Resources

Prior to project-specific ground-disturbing activities, a tribal cultural resources awareness training program will be provided to all construction personnel active on the project site. A representative or representatives from culturally affiliated Native American Tribe(s) will be invited to participate in the development and delivery of the training program in coordination with a professional archaeologist meeting the United States Secretary of Interior's qualification standards for archaeology. The program will include relevant information regarding tribal cultural resources, including applicable laws and regulations, the consequences of violating said laws and regulations, protocols for resource avoidance, and protocols for discoveries, including who to contact in the event of a discovery and what to do upon the discovery of human remains. The program will also underscore the requirement for confidentiality and culturally appropriate treatment of any find of significance to Native Americans and protocols, consistent with Native American Tribal values.

Mitigation Measure 3.17-2: Halt Ground Disturbance Upon Discovery of Subsurface Tribal Cultural Resources and Evaluate Discovered Resource

During subsequent project-specific ground disturbing construction activities, if any suspected tribal cultural resources are discovered, all work shall cease within 100 feet of the find, and a tribal monitor from culturally affiliated Native American Tribe(s) shall be retained, if one is not currently on site. The tribal monitor shall determine if the find is a tribal cultural resource. The consulting THPO, or tribal monitor if the consulting tribe has no THPO, will make recommendations for further evaluation and culturally appropriate treatment of discovered Tribal cultural resources as necessary. Consultation with an archaeologist who meets the secretary of the Interior's professional qualifications for archaeology may also occur.

<u>Treatment and Documentation:</u>

The culturally affiliated Tribe shall consult with the Lead Agency to (1) identify the boundaries of the new tribal cultural resource and (2) if feasible, identify appropriate preservation in place and avoidance measures, including redesign or adjustments to the existing construction process, and long-term management, or 3) if avoidance is infeasible, a reburial location in proximity of the find where no future disturbance is anticipated. Permanent curation of tribal cultural resources will not take place unless approved in writing by the culturally affiliated Tribe.

The construction contractor(s) shall provide secure, on-site storage for culturally sensitive soils or objects that are components of tribal cultural resources that are found or recovered during construction. Only Tribal Representatives shall have access to the storage. Storage size shall be determined by the nature of the TCR and can range from a small lock box to a conex box (shipping container). A secure (locked), fenced area can also provide adequate on-site storage if larger amounts of material must be stored.

The construction contractor(s) and Lead Agency shall facilitate the respectful reburial of the culturally sensitive soils or objects. This includes providing a reburial location that is consistent with the Tribe's preferences, excavation of the reburial location, and assisting with the reburial, upon request.

Any discoveries shall be documented on a Department of Parks and Recreation (DPR) 523 form within 4 weeks of the discovery and submitted to the appropriate CHRIS center in a timely manner.

If articulated or disarticulated human remains, or human remains in any state of decomposition or skeletal completeness are discovered during construction activities, the County Coroner and the culturally affiliated Tribe shall be contacted immediately. Upon determination by the County Coroner that the find is Native American in origin, the Native American Heritage Commission will assign the Most Likely Descendent who will work with the project proponent to define appropriate treatment and disposition of the burials.

Work at the discovery location cannot resume until all necessary investigation, evaluation, and treatment of the discovery under the requirements of the CEQA, specifically PRC Section 21084.3[b], have been satisfied.

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

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

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

Findings after Mitigation

Through implementation of these mitigation measures, direct impacts to unanticipated tribal cultural resources may be reduced by avoiding disturbance, preserving in place within the landscape, or returning objects to a location within the project area where they will not be subject to future impacts from the project. The destruction of a tribal cultural resource may still occur, however, and would result in a significant and unavoidable direct impact.

For projects proposing to streamline environmental review, lead agencies must conduct project-level analysis for each project to analyze whether, based on substantial evidence in the record, the proposed mitigation would appropriately reduce the adverse effects on tribal cultural resources. However, SACOG cannot require the implementing agency to adopt this mitigation measure, and it is ultimately the responsibility of the implementing agency to determine and adopt project-specific mitigation.

Therefore, Impact 3.17-1 would be significant and unavoidable for purposes of this program-level review because SACOG does not have the authority to require the implementing agencies to adopt the identified mitigation measures; the mitigation measures are within the responsibility and jurisdiction of another public agency. However, implementation of the mitigation measures listed above or other comparable measures identified by the lead agency through tribal consultation at a project level would reduce the impacts to tribal cultural resources, and agencies with jurisdiction to adopt these measures should do so (PRC Section 21081(a)(1), (2).) Moreover, specific economic, legal, social, technological, or other considerations, make identification of additional mitigation measures infeasible at the plan level.

18. Utilities and Service Systems

Impact 3.18-1: Have Insufficient Water Supplies Available to Serve the Project and Reasonably Foreseeable Future Development During Normal, Dry and Multiple Dry Years

This impact is analyzed for adverse effects from Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 3.18-34 through 3.18-37 of the Draft EIR.

Significance before Mitigation

Based on the data in the applicable urban water master plans, there is a potential for regional growth to result in a demand for potable water that exceeds supply. As described above, this is projected to occur without implementation of the 2025 Blueprint, which would not result in additional population growth beyond that forecast in the urban water master plans. In fact, the regional growth pattern supported by the 2025 Blueprint could reduce per capita demand by supporting infill development. Nonetheless, there could be insufficient water supplies available to serve the plan area, based on the urban water master plans that identify a shortfall for future growth. Therefore, this impact would be **potentially significant**.

Mitigation

Mitigation Measure 3.18-1: Implement Water Conservation Measures

The implementing agency shall implement measures regarding water conservation, efficiency, capture, and reuse identified by water suppliers in state, regional, and local plans, laws, and policies, and in their own plans and ordinances during planning, design, and project-level environment review, construction, operations, and maintenance activities. Measures include, but are not limited to, the following:

- Install drip or other water-conserving or weather-based irrigation systems for landscaping.
- Coordinate with the relevant water service provider to ensure that the provider has adequate water supplies to accommodate the increase in demand. If the water service provider servicing the project site is found to have inadequate water supplies, improvements and or mitigation measures shall be identified in each project's CEQA documentation.
- Design future projects to reduce the use of potable water for landscape irrigation (xeriscaping). These design components could include drought-tolerant plantings for landscaping, water-efficient irrigation systems, the capture and use of rainwater
- Design future projects to reduce the use of potable water through the use of water-conserving fixtures such as dual-flush toilets, waterless urinals, reduced flow faucets, and EnergyStar rated appliances.
- For projects located in an area with existing reclaimed water conveyance infrastructure and excess reclaimed water capacity, these future projects shall use reclaimed water for non-potable uses, such as landscape irrigation, ornamental water features, concrete mixing, and dust control. For projects in a location planned for future reclaimed water service, projects should install dual plumbing systems in anticipation of future use.
- Adopt Tier 1 or Tier 2 Cal Green standards as mandatory local requirements.

Findings after Mitigation

Due to uncertainty in individual project conditions, the extent to which the mitigation measure above would reduce impacts to water supply is unknown at this time. Such details are not available at the plan level. Additionally, because SACOG cannot require the implementing agency to adopt this mitigation measure, and it is ultimately the responsibility of a lead agency to determine and adopt project-specific mitigation, this impact would be significant and unavoidable.

SACOG does not have authority to require the implementing agencies to adopt the identified mitigation measures; the mitigation measures are within the responsibility and jurisdiction of another public agency. However, implementation of the mitigation measure listed above or other comparable measure identified by the lead agency at a project level would reduce the impacts to utilities and service systems, and agencies with jurisdiction to adopt these measures can and should do so (PRC Section 21081(a)(1), (2).) Moreover, specific economic, legal, social, technological, or other considerations, make identification of additional mitigation measures infeasible at the plan level.

Impact 3.18-2: Require or Result in the Relocation or Construction of New or Expanded Water, Wastewater, Treatment or Storm Water Drainage, Electric Power, Natural Gas, or Telecommunications Facilities, the Construction or Relocation of Which Could Cause Significant Environmental Effects

This impact is analyzed for adverse effects from Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 3.18-37 through 3.18-39 of the Draft EIR.

Significance before Mitigation

Although the areas identified for growth in the 2025 Blueprint would include most new or expanded utilities, construction of facilities outside the regional growth footprint could result in physical effects on the environment that are not covered by this Draft EIR. Because the locations and potential impacts associated with these facilities are uncertain, this impact would be **potentially significant**.

Mitigation

Mitigation Measure 3.18-2: Require Provision of Adequate Utility Service

During project planning and environmental review, implementing agencies shall ensure provision of adequate utilities including water, wastewater, stormwater drainage, and electricity service. This shall be documented prior to project approval in the form of a capacity analysis approved by the applicable parks district.

Findings after Mitigation

Mitigation Measure 3.15-1 would require the provision of adequate public utilities but would not reduce the impact of constructing new facilities to a less-than-significant level. In addition, because the new facilities could be located outside of the growth geographies evaluated in this Draft EIR, implementation of Mitigation Measure 3.15-1 could result in additional effects on the environment. This may include the impacts of ground disturbance to air quality, hazardous materials, and cultural resources during construction as well as aesthetic and transportation impacts during operation. The physical effects of constructing new and expanded utilities would be evaluated in project-level CEQA documents, and SACOG cannot ensure that all impacts associated with these facilities can be mitigated to a less-than-significant level.

Therefore, this impact would be significant and unavoidable for purposes of this program-level review because SACOG does not have the authority to require the implementing agencies to adopt the identified mitigation measure; the mitigation measure is within the responsibility and jurisdiction of another public agency. However, implementation of the mitigation measure listed above or other comparable measures identified by the lead agency at a project level would reduce the impacts related to the provision of utilities, and agencies with jurisdiction to adopt these measures should do so (PRC Section 21081(a)(1), (2).) Moreover, specific economic, legal, social, technological, or other considerations, make identification of additional mitigation measures infeasible at the plan level.

Impact 3.18-3: Generate Solid Waste in Excess of State or Local Standards or in Excess of the Capacity of Local Infrastructure, or Otherwise Impair Attainment of Solid Waste Reduction Goals; or Fail to Comply with Federal, State, and Local Management Reduction Statutes and Regulations Related to Solid Waste

This impact is analyzed for adverse effects from Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 3.18-39 through 3.18-40 of the Draft EIR.

Significance Before Mitigation

As described above, implementation of the 2025 Blueprint would be subject to all applicable state and local laws and regulations governing the generation, management, diversion, and reduction of solid waste. Therefore, the projected land use pattern and planned transportation improvements from implementation of the 2025 Blueprint are not expected to generate solid waste in excess of state and local standards or conflict with federal, state, and local regulations related to solid waste. This impact would be **less than significant**.

The less-than-significant impact determination is confirmed by the Board of Directors based on the evidence and analysis provided in the record.

19. Wildfire

Impact 3.19-1: Expose, or Exacerbate Existing Significant Exposure of, People or Structures to: Significant Risk of Loss, Injury, or Death Involving Wildland Fires; Pollutant Concentrations from a Wildfire; or Significant Risk of Downslope or Downstream Flooding or Landslides as a Result of Post-fire Slope Instability

This impact is analyzed for adverse effects from Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 3.19-18 through 3.19-24 of the Draft EIR.

Significance before Mitigation

Regional growth, land use change, and transportation network improvements and programs associated with the 2025 Blueprint would expose people and structures to an increased risk of loss, injury, or death involving wildland fires. Risks would be exacerbated in areas where people and structures would be concentrated within and adjacent to Very High Fire Severity Zones. Wildfires would also potentially expose the plan area's population to harmful pollutant concentrations in the form of wildfire smoke and increased potential for flooding or slope instability. Therefore, impacts related to wildfire would be **potentially significant**.

Mitigation

Mitigation Measure 3.19-1: Complete a Fire Safe Plan for Land Use Projects Located in Local Responsibility Area and State Responsibility Area Very High Fire Hazard Severity Zones

Individual project applicants shall work with the municipal or regional fire marshal and the CAL FIRE Battalion Chief to produce and implement a fire safe plan (FSP) for land use projects that are located within a VHFHSZ of an LRA or an SRA. Depending on the specific environmental conditions of each project site, the FSP shall include a number of strategies, including but not limited to:

- Externally or internally illuminating street signs and address numbers on residential buildings for clearer visibility;
- Fencing materials adjacent to non-irrigated open space areas shall be constructed of non-combustible materials;
- Combustible sheds and other outbuildings shall be kept at least 30 feet from residential units and other buildings on each parcel;

- Alternative materials and construction methods exceeding the minimum criteria described in CBC Chapter 7A shall be implemented for individual land use projects located within SRA and LRA VHFHSZs to meet the "Practical Effect" principles described in CCR Title 14 – Section 1276.01 (when buildings are located within 30-feet of property lines) and reduce the potential for building-to-building fire spread. Specific requirements may include[2]:
  - Block any spaces between roof decking and the Class A roof covering to prevent embers from catching and igniting the building.
  - Eaves shall be enclosed on the underside with non-combustible material, ignition-resistant material, or minimum 2-inch lumber.
  - Exterior walls shall be constructed with non-combustible building materials such as stucco, fiber cement, stone or brick, and comply with CCR Title 24, Part 2, Chapter 7A, Section 707A.
  - Use WUI ember and flame-resistant vents, conforming with the requirements described in ASTM E2886, to protect exterior wall openings when the wall is located within 30-feet of another building. Dryer vents shall be metal and equipped with a louver or flap.
  - Exterior windows, skylights, glazed doors, and glazed openings within exterior doors shall be multi-paned with at least two tempered panes, minimum 20 minute fire rated, or fire-resistant glass block units, and shutters installed over windows shall be non-combustible.
  - Areas located under first floor bay windows shall be enclosed with non-combustible walls.
  - Exterior doors of buildings shall be non-combustible, or have a non-combustible exterior storm door, and comply with CCR Title 24, Part 2, Chapter 7A, Section 708A.
  - A minimum non-combustible area of 6 vertical inches, measured from the ground up (at grade) and from any attached horizontal surface like a deck, shall be provided on the exterior of all buildings. Non-combustible materials can include brick, stone, fiber-cement siding, or concrete.
  - Fencing materials located within 5 feet of a building shall be constructed of non-combustible materials. Areas located between 0 feet and 5 feet from all buildings shall remain non-combustible. Back-to-back, combustible fencing shall be separated by a minimum of 5 feet.
  - Landscape materials and other vegetation located within 0 to 100 feet of dwellings shall comply with the fire-resistant standards of CAL FIRE.
  - Accessory and miscellaneous structures, as defined in the CBC, located within the reduced fire setback zone shall comply with this plan and CCR Title 24, Part 2, Chapter 7A, Section 710A.
  - Decks, including posts, joists, railing, stairs, and walking surfaces, shall be non-combustible and comply with CCR Title 24, Part 2, Chapter 7A, Section 709A.
  - Projections shall be non-combustible, ignition resistant, or 1 hour fire-rated in accordance with International WUI Code, Section 503.2, and/or National Fire Protection Association 1144 Standard for Reducing Structure Ignition Hazards, Section 5.2.
  - Gutters and downspouts shall be non-combustible material. Gutters shall be provided with a non-combustible leaf guard.
- A Restrictive Covenant shall be filed with the final subdivision map which stipulates that a Fire Safe Plan has been prepared and wildfire mitigation measures shall be implemented.
- A 5-foot defensible space ember-resistant zone (Zone 0) shall be maintained around all buildings (including fencing within 5 feet).

[2] The project would comply with all applicable state and local code and regulatory requirements to achieve "Practical Effect" at the time of issuance of the building permit.

- For residential units that include a Homeowners' Association (HOA), or other acceptable entity, the HOA or other acceptable entity shall be responsible for maintaining all private emergency vehicle access roads and wildfire fuel reduction zone provisions described in the FSP. Reliable on-going sources of funding shall be established and acceptable to the applicable fire department, fire district, or fire agency with jurisdiction prior to the recording of the final map for the project. Specifically, and also without limiting the foregoing, the owners shall be responsible for the operation and maintenance of, and for potential liability arising from:
  - provisions for the necessary repair and maintenance of the roadway surface (as determined by the HOA and/or applicable fire department, fire district, or fire agency with jurisdiction);
  - removal of vegetation overgrowing the roadway and infringing on the roadway clear vertical height of 15 feet or width of 20 feet;
  - provisions for the maintenance, repair, and/or replacement of NO PARKING - FIRE LANE signage or striping; and
  - provisions for the necessary repair and maintenance of vehicle and pedestrian access gates and opening systems.
- The FSP shall include a section on Fuel Reduction Management and Defensible Space Concepts to provide a fuel modification plan that consists of the following three defensible space zones for specific wildfire fuel reduction standards associated with buildings:
  - Zone 0 – Ember-resistant Zone (0 to 5-feet from buildings);
  - Zone 1 – Lean, Clean, and Green Zone (5 feet to 30 feet from buildings, or to the property line);
  - Zone 2 – Reduce Fuel Zone (30 feet to 100 feet from buildings, or to the property line).

Findings after Mitigation

Mitigation Measure 3.19-1 would require all land use projects proposed in state and local responsibility area Very High Fire Hazard Severity Zones to complete a fire safe plan to address and minimize the potential effects resulting from wildland fire hazards. These design standards include using non-combustible materials; requiring appropriate distance between combustible buildings from residential development; utilizing construction materials that exceed minimum California Building Code fire standards; filing covenants with a final subdivision map to stipulate the fire safe plan has been implemented; adhering to homeowners association requirements regarding repair, maintenance, and removal of vegetation; and incorporating defensible space. With the implementation of this mitigation measure, the pattern of wildfire progression may be limited to low-intensity underbrush and surface burning. Indirect impacts from wildfire hazards may also be reduced by project-level planning.

For the vast majority of development projects, compliance with existing local, state, and federal regulations would minimize potential adverse effects associated with wildfire hazards; however, due to the level of uncertainty regarding the specific project types and the lack of detailed development plans at this programmatic level of analysis, it cannot be concluded with certainty that all impacts would be minimized below the threshold of significance. Individual projects may involve land use types, locations, or design features that cannot be anticipated at this planning stage.

For projects proposing to streamline environmental review, lead agencies must conduct project-level analysis for each project to analyze whether, based on substantial evidence in the record, the proposed mitigation would reduce the impact to a less-than-significant level. Additional measures to minimize unique, project-specific impacts may be identified at the time of environmental review for these individual projects; however, the measures cannot be identified at this time, nor can SACOG guarantee that such measures will, in fact, be available and feasible for all project scenarios. Furthermore, SACOG cannot require the implementing agency to adopt Mitigation Measure 3.19-1, and it is ultimately the responsibility of the implementing agency to determine and adopt project-specific mitigation. Therefore, the impact would be significant and unavoidable.

SACOG does not have the authority to require the implementing agencies to adopt the identified mitigation measure; the mitigation measure is within the responsibility and jurisdiction of another public agency. However, implementation of the mitigation measure listed above or other comparable measures identified by the lead agency at a project level would reduce the impacts related to wildfire risk, and agencies with jurisdiction to adopt these measures should do so (PRC Section 21081(a)(1), (2).) Moreover, specific economic, legal, social, technological, or other considerations, make identification of additional mitigation measures infeasible at the plan level.

Impact 3.19-2: Require the Installation or Maintenance of Associated Infrastructure in or near SRA or VHFHSZs that May Exacerbate Wildfire Risk or Result in Temporary or Ongoing Impacts to the Environment

This impact is analyzed for adverse effects from Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 3.19-24 through 3.19-25 of the Draft EIR.

Significance before Mitigation

Although the areas identified for growth in the 2025 Blueprint would include most new or expanded facilities, construction of facilities outside the regional growth footprint could result in wildfire hazards that are not covered by this Draft EIR. As described above, fire risks associated with construction activities would be addressed by the implementing agency through adherence to existing regulations and industry standard best management practices for fire prevention. Further, compliance with the California Building Code and applicable fire code requirements would ensure that construction of each regional land use project would maximize safety against wildfire and reduce existing minimize wildfire risk. Once complete, the extension of utilities would improve the plan area's capability to respond to and control potential wildfire incidents, thereby improving conditions regarding wildfire preparedness. In addition, where new infrastructure is required that involves overhead electrical power lines, projects would be subject to existing fire prevention regulations including PRC Sections 4292 and 4293. Transportation projects would not generally require the installation of additional infrastructure with the potential to exacerbate wildfire risk. Through compliance with adopted regulations and the implementation of best management practices, this impact would be **less than significant**.

The less-than-significant impact determination is confirmed by the Board of Directors based on the evidence and analysis provided in the record.

20. Cumulative Impacts

Cumulative Aesthetic Impacts in the Form of Night Sky Lighting and Cumulative Changes in the Visual Environment

This impact is analyzed for adverse effects from Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 5-11 through 5-12 of the Draft EIR.

Significance before Mitigation

There are two types of aesthetic impact that may be additive in nature and thus cumulative, night sky lighting and overall changes in the visual environment as the result of increasing urbanization of large areas. As development in one area, such as a regional urban center like downtown Sacramento, increases and possibly expands over time and meets or connects with development in an adjoining ex-urban area, the effect of night sky lighting experienced outside of the region may increase in the form of larger and/or more intense nighttime glow in the viewshed. Although growth in the 2025 Blueprint is primarily focused on Center and Corridor Communities and Established Communities, development outside of those geographies with long-distance views, may result in nighttime lighting becoming more visible, covering a larger area, and/or appearing in new areas as a result of projected development under the 2025 Blueprint.

With regard to the visual environment experienced throughout the cumulative impact analysis area, as planned cumulative development occurs over time the overall visual environmental would change. Whether this overall change in land use is experienced as an adverse or beneficial outcome is highly subjective. However, the combination of forecasted development in the SACOG region and planned development in neighboring counties would result in a different visual environment than currently exists. For the purposes of this analysis, the cumulative impacts associated with night sky lighting and changes in the visual environment are considered potentially significant and the contribution of the 2025 Blueprint to these impacts may be cumulatively considerable.

Mitigation

- Implement Mitigation Measure 3.1-1: Protect Public Views of Important Scenic Vistas, Scenic Resources Along State Scenic Highways, and Visual Character and Quality
- Implement Mitigation Measure 3.1-2: Design River crossings to Minimize Aesthetic and Visual Impacts to the Greatest Feasible Extent
- Implement Mitigation Measure 3.1-3: Design Projects to be Visually Compatible with Surrounding Areas
- Implement Mitigation Measure 3.1-6: Design Structures to Avoid or Reduce Impacts Resulting from Nighttime Light and Glare

Findings after Mitigation

Implementation of Mitigation Measures 3.1-1 through 3.1-3 and Mitigation Measure 3.1-6 would minimize the potential aesthetic impacts associated with the implementation of the 2025 Blueprint and would, therefore, minimize the contribution of the 2025 Blueprint to cumulative aesthetic impacts. If the implementing agencies adopt these mitigation measures, it would reduce the contribution of the 2025 Blueprint to cumulative impacts on the visual environment to less than significant. However, SACOG cannot require implementing agencies to adopt these mitigation measures, and it is ultimately the responsibility of the implementing agency to determine and adopt project-specific mitigation, and those agencies can and should do so. (PRC Section 21081(a)(1), (2).) Therefore, the regional contribution to this cumulative impact is significant and unavoidable.

Cumulative Loss of Agricultural and Forest Land

This impact is analyzed for adverse effects from Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 5-12 through 5-13 of the Draft EIR.

Significance before Mitigation

Based on data in the state's Farmland Mapping and Monitoring Program, implementation of the 2025 Blueprint would result in conversion of approximately 2,752 acres of prime, unique, and statewide important farmland to urban use. Based on local zoning, approximately 4,402 acres of land zoned for agricultural use would be lost.[3] Development within neighboring regions would also continue to convert agricultural land outside of the SACOG region. Collectively, this would add to the overall conversion of agricultural lands in the cumulative impact analysis area. As such, the 2025 Blueprint's contribution to the significant agricultural cumulative impact would be cumulatively considerable.

Implementation of the 2025 Blueprint would result in the conversion of 2,716 acres of forest land as defined by the California Forest Legacy Act. Development within neighboring regions could also convert forest resources and forest lands, which would add to the overall conversion of forestry resources and forest lands in the cumulative context. As such, the 2025 Blueprint would result in a cumulatively considerable contribution to the significant cumulative impact related to the loss of forestry resources and forest lands.

Mitigation

- Implement Mitigation Measure 3.2-1: Provide for Permanent Protection of Farmland
- Implement Mitigation Measure 3.2-2: Provide for Permanent Protection of Forest Land and Timberland
- Implement Mitigation Measure 3.2-3: Minimize Indirect Conversion of Farmland to Non-Agricultural Use
- Implement Mitigation Measure 3.2-4: Manage Growth at the Rural-Urban Interface to Support the Long-Term Viability of Agriculture

[3] There is an unknown overlap between these acreage totals, they are not additive.

Findings after Mitigation
If the implementing agencies adopt Mitigation Measures 3.2-1 through 3.2-5, impacts associated with the loss of agricultural and forest lands would be reduced because projects would be required to provide permanent protection for farmland, would be designed to avoid or minimize conflicts with lands protected by agricultural zoning or Williamson Act contracts and minimize the indirect conversion of farmland, would be designed to provide permanent protection of forest land and timberland, and would adopt measures to manage urban growth near the rural-urban interface to limit the further loss of agricultural lands. Implementation of Mitigation Measures 3.2-1 through 3.2-5 would reduce the contribution of the 2025 Blueprint to cumulative impacts on agriculture and forest resources but not to a less-than-significant level. Additionally, SACOG cannot require implementing agencies to adopt these mitigation measures, and it is ultimately the responsibility of the implementing agency to determine and adopt mitigation, and those agencies can and should do so. (PRC Section 21081(a)(1), (2).). Therefore, the contribution of the 2025 Blueprint to this cumulative impact remains significant and unavoidable for purposes of this program-level review.

Cumulative Impacts to Air Quality
This impact is analyzed for adverse effects from Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 5-13 through 5-14 of the Draft EIR.

Significance before Mitigation
Implementation of the 2025 Blueprint would result in significant and unavoidable impacts related to construction- and operations-related criteria pollutant emissions air district thresholds, exposure of sensitive receptors to substantial concentrations of TACs, and exposure of a substantial number of people to odors. Because air quality is inherently cumulative, the significant impacts identified above would result in a considerable contribution to a cumulative impact related to air quality.

Mitigation
- Implement Mitigation Measure 3.16-1: Implement VMT Reduction Strategies
- Implement Mitigation Measure 3.3-1: Require Applicable Design Measures
- Implement Mitigation Measure 3.3-2: Require Applicable Construction Measures
- Implement Mitigation Measure 3.3-3: Conduct a Site-Specific Health Risk Assessment
- Implement Mitigation Measure 3.3-4: Implement the Strategies Contained in the CARB Technical Advisory
- Implement Mitigation Measure 3.3-5: Require Construction Health Risk Assessment
- Implement Mitigation Measure 3.3-6: Require Applicable Local Air District Measures and Best Practices Related to Odors

Findings after Mitigation
Implementation of mitigation measures identified above would minimize the contribution of the 2025 Blueprint to cumulative air quality impacts but would not reduce them to less-than-significant levels. Additionally, SACOG cannot require implementing agencies to adopt these mitigation measures, and it is ultimately the responsibility of the implementing agency to determine and adopt mitigation, and those agencies can and should do so. (PRC Section 21081(a)(1), (2).) Consequently, cumulative impacts to air quality, and the regional contribution to them, remain significant and unavoidable.

Cumulative Impacts on Biological Resources
This impact is analyzed for adverse effects from Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 5-14 through 5-15 of the Draft EIR.

Significance before Mitigation

Projected growth within the cumulative impact analysis area will result in significant cumulative impacts on biological resources. The overall contribution of the new development and transportation infrastructure identified under the 2025 Blueprint to these cumulative impacts on biological resources would be considerable.

Mitigation

- Implement Mitigation Measure 3.4-1: Conduct a Biological Resources Assessment
- Implement Mitigation Measure 3.4-2: Identify Special-Status Plant Species, and Avoid, Minimize, and Mitigate Impacts
- Implement Mitigation Measure 3.4-3: Identify Special-Status Wildlife and Avoid, Minimize, and Mitigate Impacts
- Implement Mitigation Measure 3.4-4: Avoid, Minimize, and Mitigate Impacts on Riparian Habitat, Sensitive Natural Communities, and Other Sensitive Habitats
- Implement Mitigation Measure 3.4-5: Avoid, Minimize, and Mitigate Impacts on Wetland and Other Waters
- Implement Mitigation Measure 3.4-6: Avoid, Minimize, and Mitigate Impacts on Wildlife Movement Corridors or Native Wildlife Nursery Sites
- Implement Mitigation Measure 3.4-7: Avoid, Minimize, and Mitigate for Impacts on Protected Trees and Other Biological Resources Protected by Local Ordinances

Findings after Mitigation

Implementation of Mitigation Measures 3.4-1 through 3.4-7 would minimize the contribution of the 2025 Blueprint to cumulative impacts on biological resources in the region, but would not reduce the cumulative contribution to less-than-significant levels. Additionally, SACOG cannot require implementing agencies to adopt these mitigation measures, and it is ultimately the responsibility of the implementing agency to determine and adopt project-specific mitigation, and those agencies can and should do so (PRC Section 21081(a)(1), (2).) Consequently, cumulative impacts on biological resources, and the regional contribution to them, would be significant and unavoidable.

Cumulative Impacts on Cultural Resources

This impact is analyzed for adverse effects from Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 5-15 through 5-16 of the Draft EIR.

Significance before Mitigation

The 2025 Blueprint, in combination with other development in the cumulative analysis impact area, could contribute to ongoing substantial adverse changes in the significance of historical resources and unique archaeological resources resulting from urban development and conversion of natural lands. Therefore, the 2025 Blueprint could result in a considerable contribution to a cumulative impact related to cultural resources. This impact would be significant.

Mitigation

- Implement Mitigation Measure 3.5-1: Conduct Project-Specific Historic Built Environment Resource Studies and Identify and Implement Project-Specific Mitigation
- Implement Mitigation Measure 3.5-2: Conduct Project-Specific Archaeological Resource Studies and Identify and Implement Project-Specific Mitigation
- Implement Mitigation Measure 3.5-3: Reduce Visibility or Accessibility of Archaeological Resources

Findings after Mitigation

Mitigation Measure 3.5-1 requires actions to record, evaluate, avoid, or otherwise treat historic resources appropriately, in accordance with pertinent laws and regulations. However, State CEQA Guidelines

Section 15126.4(b)(2) notes that in some circumstances, documentation of a historical resource will not fully mitigate the impact of demolition of that resource because the historic resource would no longer exist. Therefore, a substantial adverse change in the significance of a historic resource may not be fully mitigated and it is not possible to know at this level of analysis whether this would occur.

Mitigation Measures 3.5-2 and 3.5-3 would reduce impacts on known and unknown archaeological resources because they would protect in place, recover information, record, or otherwise treat the discovered resource appropriately, and require construction monitoring of known unique archaeological resources and unevaluated resources. However, given the large size of the cumulative analysis impact area, the wide variety in resource types and significance, and likelihood of additional resources being identified due to the extensive Native American use within the cumulative impact analysis area, it is uncertain at this time whether these measures would avoid a substantial adverse change in the significance of a unique archaeological resource and if avoidance in all cases would be possible. Additionally, SACOG cannot require implementing agencies to adopt these mitigation measures, and it is ultimately the responsibility of the implementing agency to determine and adopt project-specific mitigation, and those agencies can and should do so. (PRC Section 21081(a)(1), (2).). Therefore, cumulative impacts related to cultural resources would be significant and unavoidable.

Cumulative Impacts Related to Geology, Soils, and Paleontological Resources

This impact is analyzed for adverse effects from Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 5-16 through 5-17 of the Draft EIR.

Significance before Mitigation

There is not an existing adverse cumulative condition related to geology and soils and, because projects that occur under the 2025 Blueprint would follow existing prescriptive regulations to address concerns related to these resources, the 2025 Blueprint would not result in a substantial contribution to any cumulative effects. Because there are existing adverse cumulative conditions related to damage or loss of paleontological resources, there is an existing cumulative impact related to paleontological resources. The 2025 Blueprint could result in a substantial contribution to this cumulative effect. The cumulative impact would be significant.

Mitigation

- Implement Mitigation Measure 3.6-1: Site-Specific Paleontological Resources Inventory Assessment and Construction Monitoring by a Paleontologist

Findings after Mitigation

Mitigation Measure 3.6-1 would require a paleontological report for paleontological sensitive rock units for future development and transportation projects. Implementation of the mitigation measure would not eliminate the potential for inadvertent discovery of paleontological resources nor ensure that the project’s contribution to cumulative impacts regarding paleontological resources would not be cumulatively considerable. Projects taking advantage of CEQA streamlining provisions must apply the mitigation measure described above to address site-specific conditions, resulting in impacts that remain significant and unavoidable. However, SACOG cannot require implementing agencies to adopt mitigation measures, and it is ultimately the responsibility of the implementing agency to determine and adopt project-specific mitigation, and those agencies can and should do so. (PRC Section 21081(a)(1), (2).) Therefore, the regional contribution to this cumulative impact would be significant and unavoidable.

Cumulative Impacts due to Greenhouse Gas Emissions and Energy

This impact is analyzed for adverse effects on Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 5-17 through 5-20 of the Draft EIR.

Significance before Mitigation

The 2025 Blueprint would result in significant and unavoidable impacts related to inconsistency with the state’s ability to achieve the 2030 reduction target of SB 32 and carbon neutrality by 2045 and increasing GHG emissions from project construction activities for growth in the 2025 Blueprint that could be inconsistent with achievement of the state's climate goals. Because the analysis of GHG impacts in Section 3.7 also serves as the 2025 Blueprint's cumulative analysis of GHG emissions that contribute to climate change, the 2025 Blueprint would have a significant contribution to substantial effects related to GHG emissions that would be cumulatively considerable.

Mitigation

- Implement Mitigation Measure 3.16-1: Implement VMT Reduction Strategies
- Implement Mitigation Measure 3.7-1: Coordinate with and Support Local Agencies within the Plan Area to Reduce Regional GHGs from All Sectors
- Implement Mitigation Measure 3.7-2: Implement All Feasible On- and Off-Site Mitigation Measures to Reduce GHG Emissions Below a Lead Agency–Approved Threshold of Significance

Findings after Mitigation

Implementation of mitigation measures identified above would minimize the contribution of the 2025 Blueprint to cumulative GHG and climate change impacts but would not reduce them to less-than-significant levels. Projects taking advantage of CEQA streamlining provisions must apply the mitigation measure described above to address site-specific conditions, resulting in impacts that remain significant and unavoidable. However, SACOG cannot require implementing agencies to adopt mitigation measures, and it is ultimately the responsibility of the implementing agency to determine and adopt project-specific mitigation, and those agencies can and should do so. (PRC Section 21081(a)(1), (2).) Therefore, the regional contribution to this cumulative impact would be significant and unavoidable.

Cumulative Impacts Related to Hazards and Hazardous Materials

This impact is analyzed for adverse effects of Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 5-20 through 5-21 of the Draft EIR.

Significance before Mitigation

Hazards and hazardous materials impacts may be related to the transport, use, or disposal of hazardous materials; reasonably foreseeable upset or accidental conditions involving the release of hazardous materials; emission of hazardous materials within a 0.25 mile of a school; location on a known hazardous materials site; sites with a documented history of hazardous materials use, release, or contamination that could generate localized effects on people or the environment; and airport-related hazards. However, these effects occur independently of one another and are related to site-specific and project-specific characteristics and conditions. Because impacts related to hazards and hazardous materials are generally geographically limited there is not an adverse cumulative condition for these impacts. Land use and transportation projects that require roadway diversions would be required to obtain encroachment permits and, if applicable, a construction traffic management plan, to address the safe circulation of traffic for the duration of construction activities. Therefore, the 2025 Blueprint would not result in a considerable contribution to a cumulative impact related to hazards and hazardous materials. This impact would be less than significant.

The less-than-significant impact determination is confirmed by the Board of Directors based on the evidence and analysis provided in the record.

Cumulative Impacts on Hydrology and Water Quality

This impact is analyzed for adverse effects of Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 5-21 through 5-23 of the Draft EIR.

Significance before Mitigation

The 2025 Blueprint would not result in stormwater discharges that violate water quality standards or waste discharge requirements established by the Central Valley RWQCB and Lahontan RWQCB or otherwise substantially degrade surface or groundwater quality. The 2025 Blueprint would not result in a considerable contribution to a cumulative impact related to groundwater supplies and recharge. The 2025 Blueprint would not result in a considerable contribution to a cumulative impact related to adverse hydrological effects caused by changes in drainage patterns. The 2025 Blueprint would not result in a considerable contribution to a cumulative impact pertaining to flood hazards and risking the release of pollutants due to inundation. The 2025 Blueprint would not result in a considerable contribution to a cumulative impact related to conflicting with or obstructing implementation of a water quality control plan or sustainable groundwater management plan. The 2025 Blueprint would not result in a considerable contribution to a cumulative impact related to hydrology or water quality. This impact would be less than significant.

The less-than-significant impact determination is confirmed by the Board of Directors based on the evidence and analysis provided in the record.

Cumulative Impacts Related to Land Use

This impact is analyzed for adverse effects on Regional Growth and Land Use Change and Transportation Network Improvements and Programs on page 5-23 of the Draft EIR.

Significance before Mitigation

The additional population, housing, and job growth forecasted for the planning period is not a result of the 2025 Blueprint; rather, the growth is forecast to occur with or without the proposed plan. The 2025 Blueprint provides a strategy to accommodate growth in such a way as to achieve consistency with regional planning and the SCS requirements. The 2025 Blueprint has been analyzed for consistency with SB 375 and found to be fully compliant. Impacts related to physically dividing a community are not experienced at the regional level and would not be exacerbated by conditions across the region. Consistency with the legal requirements is analyzed for the plan area and would not extend beyond the plan area into the cumulative impact analysis area. Therefore, the 2025 Blueprint would not result in a considerable contribution to a cumulative land use impact. This impact would be **less than significant**.

The less-than-significant impact determination is confirmed by the Board of Directors based on the evidence and analysis provided in the record.

Cumulative Impacts to Mineral Resources

This impact is analyzed for adverse effects of Regional Growth and Land Use Change and Transportation Network Improvements and Programs on page 5-24 of the Draft EIR.

Significance before Mitigation

Development associated with the 2025 Blueprint and other plans within the cumulative impact analysis area would occur primarily in developed areas, and extraction of rare and/or unique deposits is unlikely. In addition, implementation of the proposed transportation improvements and land use changes associated with the 2025 Blueprint and other regional plans would be required to comply with the Surface Mining and Reclamation Act as well as local general plans, specific plans, and other land use plans that include policies to protect existing and future mineral resources. As such, the 2025 Blueprint would not make a considerable contribution to a significant cumulative impact. The cumulative impact would be **less than significant**.

The less-than-significant impact determination is confirmed by the Board of Directors based on the evidence and analysis provided in the record.

Cumulative Noise Impacts

This impact is analyzed for adverse effects of Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 5-24 through 5-26 of the Draft EIR.

Significance before Mitigation

The combination of noise impacts from planned development in the SACOG region along with planned development in neighboring regions that comprise the cumulative impact analysis is not anticipated. For this reason, with the exception of operational transportation noise, there would not be an adverse cumulative condition to which noise generated by the 2025 Blueprint would contribute. Because the combination of planned development within the SACOG region and planned development in the cumulative impact analysis area may result in cumulative traffic noise impacts that cannot be fully mitigated this cumulative impact would be significant.

Mitigation

- Implement Mitigation Measure 3.12-2: Employ Measures to Reduce Traffic Noise
- Implement Mitigation Measure 3.12-4: Reduce Exposure of New Sensitive Receptors to Transportation and Stationary Noise

Significance after Mitigation

Implementation of Mitigation Measure 3.12-2 would result in substantial reductions in traffic-related noise through design techniques, specific materials (i.e., rubberized asphalt), and construction of noise barriers depending on site-specific conditions. However, the combination of planned development within the SACOG region and planned development in neighboring regions that comprise the cumulative impact analysis area may result in cumulative traffic noise impacts that cannot be fully mitigated. Additionally, SACOG cannot require implementing agencies to adopt mitigation measures, and it is ultimately the responsibility of the implementing agency to determine and adopt project-specific mitigation, and those agencies can and should do so. (PRC Section 21081(a)(1), (2).). For these reasons, the contribution of the 2025 Blueprint to the cumulative impact would be significant and unavoidable.

Cumulative Impacts to Population and Housing

This impact is analyzed for adverse effects of Regional Growth and Land Use Change and Transportation Network Improvements and Programs on page 5-26 of the Draft EIR.

Significance before Mitigation

Through 2050, approximately 580,000 people, 260,000 jobs, and 278,000 housing units are forecasted to be added in the plan area. This will represent an approximate 23 percent increase in the population and 29 percent increase in the housing expected to be added overall in the plan area by 2050. The regional growth forecast was informed by the Development Pattern used in the 2025 Blueprint, as well as transportation network improvements associated with the 2025 Blueprint. The 2025 Blueprint would distribute growth by focusing new development and infrastructure in areas with capacity to accommodate this new growth to achieve a more balanced jobs/housing ratio and to optimize transportation investments that support those land uses. Thus, implementation of the 2025 Blueprint would not result in displacement at the regional scale, and localized displacement would not be expected to exert development pressure on areas surrounding the plan area. The 2025 Blueprint would not result in a considerable contribution to a significant cumulative impact. The impact would be less than significant.

The less-than-significant impact determination is confirmed by the Board of Directors based on the evidence and analysis provided in the record.

Cumulative Impacts on Public Services

This impact is analyzed for adverse effects of Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 5-26 through 5-27 of the Draft EIR.

Significance before Mitigation

During project planning, design, and project-level environmental review under the 2025 Blueprint, implementing agencies would ensure that adequate service levels for public services are achieved. The implementing agency would ensure that public services would be available to comply with applicable service levels. This would be documented prior to project approval in the form of a capacity analysis, provider will-serve letter, or equivalent documentation. Although implementation of the 2025 Blueprint would improve regional transportation, there is a possibility police, fire, and other emergency response times due to the increased land development would be longer in 2050 as compared to baseline conditions. As such, the contribution of the 2025 Blueprint to those impacts is **potentially significant**.

Mitigation

- Implement Mitigation Measure 3.14-1: Require Provision of Adequate Public Services

Findings after Mitigation

During project planning, design, and project-level environmental review, implementing agencies would ensure that adequate service levels for public services are achieved. However, SACOG does not have the authority to require the implementing agencies to comply with service levels, and no feasible mitigation measure exists to reduce the cumulative impact on service levels of public services caused by the implementation of 2025 Blueprint. Additionally, SACOG cannot require implementing agencies to adopt mitigation measures, and it is ultimately the responsibility of the implementing agency to determine and adopt project-specific mitigation, and those agencies can and should do so. (PRC Section 21081(a)(1), (2).). Therefore, the 2025 Blueprint would make a considerable contribution to this cumulative impact. This impact would be significant and unavoidable.

Cumulative Impact to Parks and Recreation

This impact is analyzed for adverse effects of Regional Growth and Land Use Change and Transportation Network Improvements and Programs on page 5-27 of the Draft EIR.

Significance before Mitigation

The development of the 2025 Blueprint would improve the efficiency of regional transportation systems to limit the increase in demand for parks and recreational facilities. However, since the Development Pattern in the 2025 Blueprint would concentrate development in the region, it is possible that level of service standards of existing parks and recreational facilities would be exceeded. Local agencies will strive to meet their parks standards, but infill development may not allow local jurisdictions to achieve their ideal resident-to-acre ratio as outlined in their parks and recreation plans. The increased use of existing parks and recreational facilities may contribute to the degradation of these resources over time. In addition, parks and recreation areas would be developed within the areas identified for growth, as residential developments indicated in the 2025 Blueprint would need to identify land for parks as part of their entitlements. Impacts associated with construction of new recreation facilities are within the scope of the analysis in the Draft EIR. Therefore, although the 2025 Blueprint would have a potentially significant impact related to the degradation of quality of recreational facilities, this would be a localized impact and would not result in an adverse cumulative impact. Cumulative impacts related to recreation resources would be less than significant.

The less-than-significant impact determination is confirmed by the Board of Directors based on the evidence and analysis provided in the record.

Cumulative Impacts on Transportation

This impact is analyzed for adverse effects on Regional Growth and Land Use Change and Transportation Network Improvements and Programs on page 5-28 of the Draft EIR.

Significance before Mitigation

Although per capita VMT within the region is forecast to continue to decline by 2050, total household-generated VMT with implementation of the 2025 Blueprint is forecast to increase largely due to the increase of approximately 580,000 people. The VMT per capita decline indicates that the projected land use pattern and planned transportation improvements assumed in the 2025 Blueprint would effectively work together to improve system efficiency and minimize increases in VMT. While implementation of the 2025 Blueprint would achieve VMT reductions per capita, they are not enough to help the state successfully achieve desired statewide goals. The contribution of the 2025 Blueprint to this cumulative impact is cumulatively considerable and would be potentially significant.

Mitigation

- Implement Mitigation Measure 3.16-1: Implement VMT Reduction Strategies

Findings after Mitigation

Implementation of Mitigation Measure 3.16-1 would minimize the contribution of the 2025 Blueprint to cumulative VMT but would not reduce this impact to a less-than-significant level. SACOG cannot require implementing agencies to adopt mitigation measures, and it is ultimately the responsibility of the implementing agency to determine and adopt project-specific mitigation, and those agencies can and should do so. (PRC Section 21081(a)(1), (2).). Further, until the state identifies a program for further VMT reductions, and Metropolitan Planning Organizations (MPOs) have funding and authorization to achieve the reductions, the 2025 Blueprint would make a considerable contribution to a significant cumulative VMT impact. This impact would be significant and unavoidable.

Cumulative Impacts on Tribal Cultural Resources

This impact is analyzed for adverse effects on Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 5-28 through 5-29 of the Draft EIR.

Significance before Mitigation

Transportation network improvement and programs under the 2025 Blueprint could potentially affect tribal cultural resources due to direct impacts related to construction and operation that could result in substantial alteration or removal of a tribal cultural resource, and indirect impacts from access-related damage from construction projects and ongoing operations. Therefore, the contribution of the 2025 Blueprint to this cumulative impact is cumulatively considerable and would be potentially significant.

Mitigation

- Implement Mitigation Measure 3.17-1: Prepare and Implement a Worker Awareness Training Program for Tribal Cultural Resources
- Implement Mitigation Measure 3.17-2: Halt Ground Disturbance Upon Discovery of Subsurface Tribal Cultural Resources and Evaluate Discovered Resources
- Implement Mitigation Measure 3.17-3: Reduce Visibility or Accessibility of Tribal Cultural Resources

Findings after Mitigation

Mitigation Measures 3.17-1, 3.17-2, and 3.5-3 would reduce impacts on known and unknown tribal cultural resources because they would protect in place, recover information, record, or otherwise treat the discovered resource appropriately, and require construction monitoring of known resources and unevaluated resources. However, given the large geographic extent of the plan area, the wide variety in resource types and significance, and likelihood of additional resources being identified due to the extensive Native American use of the plan area, it is uncertain at this time whether these measures would avoid a substantial adverse change in the significance of a tribal cultural resource and if avoidance in all cases would be possible. Additionally, SACOG cannot require implementing agencies to adopt mitigation measures, and it is ultimately the responsibility of the implementing agency to determine and adopt project-specific mitigation, and those agencies can and should do so. (PRC Section 21081(a)(1), (2).) Therefore, the 2025 Blueprint would result in a considerable contribution to a cumulative impact related to tribal cultural resources. This impact would be significant and unavoidable.

Cumulative Impacts to Utilities and Service Systems

This impact is analyzed for adverse effects on Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 5-29 through 5-31 of the Draft EIR.

Significance before Mitigation

The 2025 Blueprint is designed to be consistent with local planning documents, including the growth and water demand projections used in local urban water management plans. However, the projected Development Pattern under the 2025 Blueprint would generate water demand in exceedance of the projected water supply contained in several urban water management plans in the plan area. Therefore, increases in water demand associated with the projected land use pattern of the 2025 Blueprint could exceed projected supplies during normal, single dry year, and multiple dry year scenarios for portions of the plan area, which would result in a considerable contribution to the significant cumulative impact.

Stormwater drainage systems are generally provided by local governments for areas within their jurisdictions or for combined county/city areas and are not typically provided on a regional or extra-regional basis. Stormwater drainage solutions typically depend on site-specific and project-specific characteristics and implementation. As such, impacts to stormwater drainage systems within the cumulative impact analysis area would not combine to create a significant cumulative impact.

Under the 2025 Blueprint Development Pattern, population and job growth would be concentrated in areas of existing development and would generate the most additional wastewater demand in these areas. It is likely that some treatment facilities would need to expand their capacity before 2050 to meet expected population growth, or to respond to regional water quality control board requirements to provide capacity to receive their National Pollutant Discharge Elimination System permit. Therefore, the 2025 Blueprint could result in a considerable contribution to a significant cumulative impact.

The 2025 Blueprint would not make a considerable contribution to a cumulative impact related to solid waste. The cumulative energy and infrastructure impacts are not considered to be significant, and the 2025 Blueprint would not result in a considerable contribution to the significant cumulative impact.

Mitigation

- Implement Mitigation Measure 3.18-1: Implement Water Conservation Measures
- Implement Mitigation Measure 3.18-2: Require Provision of Adequate Utility Service

Findings after Mitigation

If the implementing agencies adopt Mitigation Measures 3.18-1 and 3.18-2, it would reduce the contribution of the 2025 Blueprint on cumulative impacts on water supply and wastewater to a less-than-significant level. However, SACOG cannot require implementing agencies to adopt these mitigation measures, and it is ultimately the responsibility of the implementing agency to determine and adopt project-specific mitigation, and those agencies can and should do so. (PRC Section 21081(a)(1), (2).) Therefore, the regional contribution to this cumulative impact would be significant and unavoidable.

Cumulative Impacts to Wildfire Hazards

This impact is analyzed for adverse effects of Regional Growth and Land Use Change and Transportation Network Improvements and Programs on pages 5-31 through 5-32 of the Draft EIR.

Significance before Mitigation

The 2025 Blueprint would contribute to an adverse cumulative impact related to wildfire hazards from locating more residents in proximity to, and within, areas of high wildfire risk, potentially exposing people and structures to pollutant concentrations resulting from wildfire smoke. Because the regional growth pattern includes growth within wildfire hazard areas and such anthropogenic influence is known to increase wildfire risk, the risks associated with wildfire would not be avoided. Therefore, the project would result in a considerable contribution to a significant cumulative impact related to the exacerbation of wildfire risk.

Mitigation

- Implement Mitigation Measure 3.19-1: Complete a Fire Safe Plan for Land Use Projects Located in Local Responsibility Area and State Responsibility Area Very High Fire Hazard Severity Zones

Findings after Mitigation

If the implementing agencies adopt Mitigation Measure 3.19-1, it would reduce the contribution of the 2025 Blueprint on cumulative impacts on wildfire hazards. Further, for the vast majority of development projects, compliance with existing local, state, and federal regulations would minimize potential adverse effects associated with wildfire hazards;

however, due to the level of uncertainty regarding the specific project types and the lack of detailed development plans at this programmatic level of analysis, it cannot be concluded with certainty that all impacts would be minimized below the threshold of significance. SACOG does not have the authority to require the implementing agencies to adopt the identified mitigation measure; the mitigation measure is within the responsibility and jurisdiction of another public agency. However, implementation of the mitigation measure listed above or other comparable measures identified by the lead agency at a project level would reduce the impacts related to wildfire risk, and agencies with jurisdiction to adopt these measures should do so (PRC Section 21081(a)(1), (2).) Moreover, specific economic, legal, social, technological, or other considerations, make identification of additional mitigation measures infeasible at the plan level.

VI. PROJECT ALTERNATIVES

Pursuant to Section 15126.6 of the CEQA Guidelines, the EIR considered four alternatives to the proposed project. These alternatives focus on strategies designed to substantially reduce or avoid environmental impacts, notably VMT and associated GHG emissions, while still feasibly meeting most of the basic project objectives. Consistent with State CEQA Guidelines Section 15126.6 and relevant CEQA case law (such as *Citizens of Goleta Valley v. Board of Supervisors* [1990] and *Habitat and Watershed Caretakers v. City of Santa Cruz* [2013]), these alternatives represent distinct, feasible approaches to achieving the project's core objectives while explicitly addressing and mitigating its environmental impacts.

The following alternatives are evaluated in this Draft EIR.

- **Alternative 1: No Project Alternative** assumes that the 2025 Blueprint is not adopted and the projected Development Pattern and planned transportation improvements set forth in the 2020 MTP/SCS continue to apply.
- **Alternative 2: Infill Development Focused Alternative** focuses the majority of growth in infill areas and adjusts the transportation projects to serve these communities.
- **Alternative 3: Prioritized Investments in VMT Reduction Alternative** would include an enhanced focus on transportation projects that are associated with VMT reduction.

The Board finds that a good-faith effort was made in the EIR to evaluate a reasonable range of alternatives that could feasibly attain most of the basic objectives of the project and that will avoid or substantially lessen any of the significant effects of the project.

A. FEASIBILITY OF ALTERNATIVES

Section 15126.6(f)(1) and (2) of the CEQA Guidelines provides a discussion of factors that can be taken into account in determining the feasibility of alternatives. These factors include:

- Project Objectives
- Avoid or Substantially Lessen Significant Effects
- Site Suitability
- General Plan Consistency
- Other Plans or Regulatory Limitations
- Economic Viability
- Availability of Infrastructure
- Jurisdictional Boundaries/Regional Context
- Property Ownership and Control

- Other Reasons for Rejecting as Infeasible (e.g. effects cannot be reasonably ascertained or implementation is remote and speculative)

Under CEQA, "(f)easible means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors" (CEQA Guidelines Section 15364.) The concept of feasibility permits agency decision-makers to consider the extent to which an alternative is able to meet some or all of a project's objectives. In addition, the definition of feasibility encompasses desirability to the extent that an agency's determination of infeasibility represents a reasonable balancing of competing economic, environmental, social, and technological factors.

B. EVALUATION OF ALTERNATIVES

The Board of Directors finds that the range of alternatives studied in the EIR reflects a reasonable attempt to identify and evaluate various types of alternatives that would potentially be capable of reducing the environmental effects of the 2025 Blueprint. The Board of Directors finds that the alternatives analysis is sufficient to inform the Board and the public regarding the tradeoffs between the degree to which alternatives could reduce environmental impacts and the corresponding degree to which the alternatives would hinder achievement of the project objectives and/or be infeasible.

The Board of Directors is free to reject an alternative that it considers undesirable from a policy standpoint, provided that such a decision reflects a reasonable balancing of various "economic, social, and other factors." Based on impacts identified in the EIR, and other reasons documented below, the Board of Directors finds that adoption and implementation of the 2025 Blueprint is the most desirable, feasible, and appropriate plan, and rejects other alternatives and other combinations and/or variations of alternatives as infeasible.

A summary of each alternative and its relative characteristics, and documentation of the Board's findings in support of rejecting the alternative as infeasible, are provided below.

1. Alternatives Considered and Rejected

NO ROAD EXPANSION ALTERNATIVE

To explore the connection between new lane miles and VMT, SACOG considered an alternative that would remove all new roads and road expansions from the transportation project list. (Draft EIR page 4-4)

Reasons for Rejection

Eliminating road expansion or extension projects may not result in a lower per-capita VMT than the 2025 Blueprint as analyzed in this Draft EIR. Roadway projects would be expected to increase VMT if they facilitate (1) new development in areas that encourage longer driving trips, (2) users switching from other modes (e.g., transit, walking, biking) to single occupancy vehicles, or (3) travel trips shifting from routes on local streets to longer, faster freeways. However, not all projects that add lane miles increase per capita VMT.

New and expanded roads are a relatively small portion of the projects in the 2025 Blueprint and are proposed to address several conditions. The expansion of existing roadways can be intended to address bottlenecks that are contributing to congestion, and road extensions can provide more efficient connections to job centers that reduce commute distances. In these cases, roadway capacity projects may support shifting trips from longer routes and would not compete with trips by other modes (i.e., the route is not served by transit or could not be made walking/biking). Further, many vehicle trips are non-discretionary, in that a given household does not have the option to forego trips as a result of increased congestion or lower accessibility to important destinations (e.g., driving trips to work, school, grocery stores, and other essential services). Unless there are multimodal options available, these trips would continue to occur. In addition, the increased congestion under this alternative has the potential to increase traffic-related impacts to air quality, noise, and emergency response. The region does not have funding available to sufficiently serve all households in the region with transit or other alternatives to driving. Some roadway expansion is necessary to ensure the transportation system, including transit services, can provide reasonable access between homes and both work and non-work destinations.

Therefore, because many of the roadway expansions in the transportation project list of the 2025 Blueprint are designed to reduce the distances between destinations and increase accessibility for residents, removing these projects from the transportation list may not correlate to a reduction in VMT. Any reductions in per-capita VMT would likely be negligible, and the alternative would not substantially lessen the significant impacts of the project. Further, the congestion anticipated to occur without the roadway expansion projects would increase the severity of other environmental impacts. For these reasons, this alternative was not carried forward for detailed evaluation. (Draft EIR page 4-4)

Based on the above, the No Road Expansion Alternative may not result in substantial reductions of environmental impacts. The Board rejects this alternative as infeasible due to political, economic and legal constraints.

INFILL ONLY ALTERNATIVE

In this alternative, the projected land use pattern constrains the 20-year growth to Center and Corridor Communities and Established Communities. No growth in this scenario is assumed in Developing Communities or Rural Residential Communities. Planned transportation improvements would be concentrated on the existing system, with relatively few new roads to serve new growth areas. New roads would be limited to providing connections from the existing system to development in Established Communities. (Draft EIR pages 4-4 and 4-5)

Reasons for Rejection

By limiting growth to Center and Corridor Communities and Established Communities, this alternative would likely meet the GHG reduction objectives of the 2025 Blueprint. However, this alternative does not represent a reasonable land use forecast based on the latest available land use conditions and trends. Metropolitan Planning Organizations (MPOs) in air quality non-attainment areas must use the latest available estimates and assumptions for population, land use, travel, employment, congestion, and economic activity in the development of the MTP (23 CFR Section 450.322[e]). Not doing so would jeopardize the plan's conformity analysis by basing future emissions estimates on a land use pattern that is infeasible to implement. This alternative is not in alignment with locally planned growth and SACOG cannot supersede the exercise of land use authority by cities and counties within the region.

To inform the land use projection, SACOG analyzed policy, regulatory, and market factors including status of local, state, and federal entitlement applications; housing permit activity in the plan area; major infrastructure requirements; and developer readiness to pursue entitlement and construction. An all-infill alternative would not acknowledge the current condition of Developing Communities with projects that are approved and those that have commenced construction. This alternative also would not acknowledge that the majority of Rural Residential Communities already allow a certain amount of development by right. Excluding growth from these communities would not represent a realistic or feasible alternative. (Draft EIR page 4-5)

SACOG therefore finds that an all-infill alternative would be politically and economically infeasible. Political and economic constraints are acceptable reasons for finding an alternative infeasible under CEQA. (Pub. Resources Code, Section 21081, subd. (a)(3) [alternatives may be found infeasible based on "specific economic, legal, social, technological, or other considerations"]; CEQA Guidelines, Section 15126.6, subd. (f)(1) [in devising a range of alternatives, the lead agency may take into account site suitability, economic viability, availability of infrastructure, general plan consistency, and consistency with other plans or regulatory limitations, among other factors].)

While political constraints may play a role in the infeasibility of the Infill Only Alternative, economic constraints play an even larger role. Federal transportation planning law also requires land development forecasts be based on reasonable assumptions (40 CFR Section 93.122(b)(1)). The many market challenges to infill areas of the region make a 100 percent infill scenario an infeasible alternative for consideration.

Based on the above, the SACOG Board rejects the Infill Only Alternative as infeasible due to the political, economic, and legal constraints described above.

2. Comparative Analysis of Remaining Alternatives

ALTERNATIVE 1: NO PROJECT ALTERNATIVE

Description of No Project Alternative

The No Project Alternative represents a scenario in which an updated MTP/SCS (i.e., the 2025 Blueprint) is not adopted and the 2020 MTP/SCS remains in effect. In the 2020 MTP/SCS, roughly 65 percent of new housing and 82 percent of new jobs are located in infill areas (Center and Corridor Communities and Established Communities). This alternative would also maintain the transportation project list from the 2020 MTP/SCS. Project investment strategies from the adopted 2020 MTP/SCS would be carried forward. This alternative would focus on bus and rail projects and would increase transit service by increasing vehicle service hours. Like the 2025 Blueprint, this alternative would replace gas tax reliance with a mileage-based fee structure. The region's priced High Occupancy Toll Lane network would include reversible lanes and would require an aggressive timeline to deliver the network by 2035. (Draft EIR pages 4-5 and 4-6)

Attainment of Project Objectives

This alternative attains the project objectives, but less effectively and successfully than the 2025 Blueprint. The Development Pattern of the No Project Alternative builds on the 2004 Blueprint and provides roughly the same amount of infill as the project, with job and housing growth spread across the Center and Corridor, Established, and Developing communities. This alternative includes policies and programs to connect workers to jobs across the region and would promote growth in homes and jobs near high-frequency transit. The No Project Alternative demonstrated that it would also achieve the GHG reduction targets assigned to SACOG by CARB when the 2020 MTP/SCS was adopted by this Board.

This alternative identifies projects to support the development of a safe, reliable, and multimodal transportation system. However, because the transportation project list would not be updated to reflect current conditions, the funding priorities under this alternative may not align with current conditions or local objectives. (Draft EIR page 4-6)

Environmental Impacts

The comparative analysis of the No Project Alternative is provided on pages 4-6 through 4-11 of the Draft EIR. Table 4-3 on pages 4-25 through 4-26 of the Draft EIR summarizes the impacts of the three alternatives as compared to the identified impacts of the project. As substantiated in the Draft EIR, the No Project Alternative would generally result in similar overall impacts in all CEQA categories of impact. Impacts to agriculture and forestry resources may be slightly reduced, but would remain significant and unavoidable. Impacts to air quality and GHG emissions and energy would be slightly greater but the overall significance conclusion would be unchanged. Impacts to Land Use and Planning would be greater, resulting in a significant and unavoidable impact that does not occur under the 2025 Blueprint.

Findings for No Project Alternative

Although it is assumed that this alternative may achieve the 19 percent reduction target established for SACOG by CARB, this alternative would not meet the core requirement of SB 375 to prepare an SCS that aligns with local land use planning. That is, this alternative does not reflect growth in Developing Communities that has been approved at the local level where construction has already commenced. In this regard, it would not meet the SCS requirements.

This alternative attains some project objectives, but less effectively and successfully than the proposed 2025 Blueprint because the transportation list would not reflect current funding priorities. Based on the analysis contained in the Draft EIR and the summary discussion above, the Board of Directors hereby rejects the No Project Alternative as infeasible because it fails to avoid significant environmental impacts. Further, the No Project Alternative is undesirable from a policy perspective because it would jeopardize state and federal funding and does not successfully achieve the project objectives aligned with adopted regulations (i.e., would not meet the core requirements of SB 375, as explained above). Adoption of the 2025 Blueprint is the superior choice when comparing and balancing relevant factors.

ALTERNATIVE 2: INFILL DEVELOPMENT FOCUSED ALTERNATIVE

Description of the Infill Development Focused Alternative

This alternative assumes the same growth in population, jobs, and housing numbers as the 2025 Blueprint, but with more compact and mixed land uses. Under this alternative, the vast majority of growth would occur in infill areas with expansion only occurring in greenfield developing communities under construction as of January 2020. Compared to the 2025 Blueprint and Alternative 1, this alternative provides the most new, small-lot and attached housing and the most growth through infill and redevelopment. Growth in infill areas would consist of already approved projects, vacant lots, and redevelopment of underutilized commercial corridors oriented around the transportation investments included in the plan.

Transit projects would be focused on high quality and high frequency service in productive corridors rather than coverage. To address coverage, on-demand micro transit services, focused on transfers to the high-frequency network at multimodal mobility hubs, would supplement the transit system. Bicycle and pedestrian facilities would connect essential destinations within communities through an integrated bike and trail network. A regional managed lane system with multi-lane express lane facilities would improve congestion management, and transit would be implemented for more reliability in service to increase transit ridership.

The alternative also assumes that locally approved developments in Developing Communities do not move forward – a condition that would be challenging to realize because it is difficult to use policy to stop vested growth. Additionally, Alternative 2 includes a high funding allocation for transit and relies on an exceptionally high farebox recovery rate, which would be unlikely to occur under current operations. (Draft EIR page 4-12)

Attainment of Project Objectives

This alternative would have the smallest amount of acreage converted for development of all the alternatives due to the fact that it has the highest proportion of growth in Center and Corridor Communities and the highest proportion of compact housing- such as small lot single family homes or attached homes- of all of the alternatives. As such, this alternative would also result in the smallest amount of converted farmland and impacted biological resources. This alternative also meets the requirements for regional transportation plans and achieves the GHG reduction targets assigned to SACOG by CARB.

Due to the compact development pattern and strong emphasis on transit investment, this alternative would be expected to have the highest increase in the share of commute trips made by transit, walking, or biking. The transportation system improvements under this alternative would be substantially consistent with the improvements in the 2025 Blueprint. As a result, this alternative would achieve the project objective related to building and maintaining a safe, reliable, and multimodal transportation system in a manner similar to the project. Also, like the 2025 Blueprint, this alternative would replace gas tax reliance with a mileage-based fee structure. (Draft Pages 4-12 and 4-13)

Environmental Impacts

The comparative analysis of Alternative 2 is provided on pages 4-13 through 4-19 of the Draft EIR. Table 4-3 on pages 4-25 through 4-26 of the Draft EIR summarizes the impacts of the three alternatives as compared to the identified impacts of the project. As substantiated in the Draft EIR, Alternative 2 would generally result in slightly less impacts in all CEQA categories.

Findings for the Infill Development Focused Alternative

Alternative 2 would have the most reduced impacts of all alternatives as compared to the proposed 2025 Blueprint. As substantiated in the Draft EIR, Alternative 2 would generally result in less overall impacts in all CEQA categories of impact. Alternative 2 would bring the highest share of new compact and attached housing, least dispersed development pattern/fewest developed acres, and highest number of homes and jobs near high-quality transit. It would result in the lowest amount of agricultural and natural resource lands being urbanized, the largest increase in bus and rail transit services, the smallest increase in new and expanded roads, and the biggest increase in the use of alternative modes of transportation.

To achieve the level of infill development and transit performance for Alternative 2, land use assumptions were made that go beyond the federal requirements of what is reasonable to assume. For instance, Alternative 2 assumes that over 50 percent of new housing will occur in Centers and Corridors. While the 2025 Blueprint Land Use Forecast assumes ambitious growth in Centers and Corridors that is higher than historical trends, assuming more than half of all housing starts in these areas is not realistic given historic trends and underlying infrastructure deficiencies in these areas. The region did not build more than 20 percent of regional permits in centers and corridors for any year between 2001 and 2021. While permits in centers and corridors have steadily increased as a proportion of total units per year from 23 percent in 2022 to 31 percent in 2024, assuming 2020-2050 permits will average over 50 percent presents a tremendous challenge that exceeds what is reasonable to assume in an SCS. The alternative also assumes that locally approved developments in Developing Communities do not move forward – a condition that would be challenging to realize because it is difficult to use policy to stop vested growth. Specifically, Alternative 2 assumes only 16 percent of housing permits will occur in Developing Communities and Rural Residential Communities. Given the realities that there are over 400,000 units of planned and approved housing capacity in these areas at the local level, exceeding the entire regional growth projections of 278,000 homes between 2020 and 2050, this proportion is unrealistic without fundamental shifts in underlying development economics that the SCS is not likely to influence. This is because local jurisdictions are obligated to process development applications that meet certain standards, and land owners generally have a right to develop their property in a manner that is consistent with adopted plans and regulations. SACOG policy does not supersede local land use authority. Additionally, Alternative 2 includes a high funding allocation for transit and relies on an exceptionally high farebox recovery rate. The region’s average farebox recovery ratio was just 9.6 percent down from a 16.9 percent average between 2002 and 2024. Given this trend, Alternative 2’s ambitious farebox recovery ratio is unlikely to occur. (Draft EIR page 4-12)

The Board of Directors rejects Alternative 2 because it would not satisfy the legal requirements for an RTP/SCS and is infeasible given current and historic market trends in housing production and transit productivity. The Board finds this alternative infeasible because the reduced environmental impacts from infill development do not outweigh the desire for, and benefits of, an integrated planning document that accurately reflects projects in the region.

ALTERNATIVE 3: PRIORITIZED INVESTMENTS IN VMT REDUCTION ALTERNATIVE

Description of the Prioritized Investments in VMT Reduction Alternative

The Prioritized Investments in VMT Reduction Alternative would prioritize funding for an expanded list of transportation projects that are associated with VMT reduction. The Regional Growth Projection and Development Pattern would be the same under this alternative as identified in the 2025 Blueprint. This alternative would have the following specific features:

- Active Transportation and Micro-Mobility: This alternative aggressively expands bicycle, pedestrian, and micro-mobility infrastructure across the six-county region, reprioritizing roadway and street infrastructure toward active and micro-mobility travel modes. This includes both investments in regional bicycle superhighways, interconnected trails, safe routes to schools, comprehensive pedestrian infrastructure, and regional policy incentives and financial subsidies for personal micro-mobility vehicles and e-bike use. The implementation of this alternative would result in changes to the existing environment through reduction in road capacity for automobiles, reallocating roadway space to protected bike lanes, pedestrian plazas, and micro-mobility pathways. New development under this alternative would be required to prioritize walkability, active transportation amenities, and integrated micro-mobility stations.
- Regional Pricing and Demand Management: This alternative focuses on regional transportation demand management (TDM) strategies and market-based pricing to strongly discourage personal vehicle use, especially during peak commute periods. This alternative assumes that the road use fees are approximately five times higher than envisioned in the proposed plan to address the transportation needs. Alternative 3 also expands region-wide incentives for telecommuting, remote working hubs, flexible scheduling, and other employer-based TDM programs.

- Electric and Zero-Emission Vehicle Infrastructure: Finally, Alternative 3 places strategic focus on accelerating widespread adoption of electric and zero-emission vehicles (ZEVs) across the six-county region, accompanied by robust infrastructure and policy incentives to encourage rapid transition away from combustion engines. Implementation of this aspect of the alternative would include the rapid expansion of charging infrastructure, targeting residential, workplace, and publicly accessible locations, ensuring comprehensive geographic coverage. (Draft EIR page 4-19)

Attainment of Project Objectives

Alternative 3 would meet the project objectives related to land use in the same manner as the 2025 Blueprint because the alternative would not affect the land use components of the plan. Like the 2025 Blueprint, this alternative would satisfy the objectives related to building vibrant communities, providing a mix of housing types, revitalization of commercial corridors, and creating complete communities.

Alternative 3 would foster the next generation of mobility solutions and would fulfill this objective. Although the support for ZEV infrastructure envisioned under Alternative 3 would reduce vehicle emissions, these reductions could not be attributed to the GHG reduction targets assigned to SACOG by CARB and would not contribute to satisfaction of the SB 375 requirements. The emphasis on active transportation, micromobility, and TDM strategies may be sufficient to attain the objective to achieve the GHG reduction target set by CARB.

The active transportation and micro-mobility element of this alternative would increase the emphasis of the plan on multimodal transportation and would satisfy the project objective to build and maintain a safe, reliable, and multimodal transportation system. Alternative 3 includes and accelerates the road user fees to generate greater revenue and exercise a greater influence on travel behavior. (Draft EIR page 4-20)

Environmental Impacts

The comparative analysis of Alternative 3 is provided on pages 4-20 through 4-25 of the Draft EIR. Table 4-3 on pages 4-25 through 4-26 of the Draft EIR summarizes the impacts of the three alternatives as compared to the identified impacts of the project. As substantiated in the Draft EIR, Alternative 3 would generally result in similar or slightly reduced overall impacts in all CEQA categories.

Findings for the Prioritized Investments in VMT Reduction Alternative

The Prioritized Investments in VMT Reduction Alternative would prioritize funding for an expanded list of transportation projects that are associated with VMT reduction. As a result, far fewer maintenance and expansion projects would receive funding. This alternative would both directly reduce VMT and reduce the GHG emissions associated with vehicle travel. By making non-automotive travel a highly attractive and viable alternative, this alternative could reduce impacts to local air quality and noise, enhancing overall public health. However, overall impacts would be similar and no significant and unavoidable impacts would be avoided through the implementation of this alternative

Moreover, this alternative approach to transportation is undesirable from a policy perspective because it would redirect investment from planned projects that have been identified for funding based on community need to active transportation and micro-mobility projects that may be less widely used without a major shift in community preference and travel patterns. Road user fees that are five times higher than the plan would be used to support this shift. However, such a penalty may disproportionately affect disadvantaged communities in a manner that does not align with SACOG’s triple bottom line framework. The Board of Directors rejects Alternative 3 for these reasons. The reduced environmental impacts from increased focus on VMT reduction do not outweigh the desire for, and benefits of, an integrated planning document that accurately reflects projects in the region.

VII. STATEMENT OF OVERRIDING CONSIDERATIONS

A. MAJOR CONCLUSIONS OF THE ENVIRONMENTAL ANALYSIS

As set forth in the preceding sections, the SACOG Board of Directors' approval of the 2025 Blueprint will result in significant adverse environmental effects. These impacts may be: (1) less than significant after mitigation but identified as significant and unavoidable because SACOG cannot compel agencies to implement mitigation, (2) assumed significant and unavoidable because of uncertainty of the level of specific impacts associated with individual projects, or (3) significant and unavoidable after mitigation is implemented or because no feasible mitigation can be identified. Due to SACOG's limited authority to impose mitigation at the project-level, the Draft EIR identifies a substantial number of significant and unavoidable impacts. In addition, many effects cannot be avoided even with the adoption of all feasible mitigation measures, and there are no feasible project alternatives which would mitigate or substantially lessen the impacts. Despite the occurrence of these effects, however, the Board of Directors chooses to approve the project because, in its view, the economic, social, and other benefits that the project will produce for the region outweigh the significant unmitigated adverse impacts. In making this Statement of Overriding Considerations in support of the Findings of Fact and the project, the Board of Directors has considered the full Record of Proceedings in which the project was considered. The following statements support this case.

It is the position of the Board of Directors that any one of these reasons is sufficient to justify approval of the 2025 Blueprint. Thus, even if a court were to conclude that not every reason is supported by substantial evidence, the Board of Directors would stand by its determination that each individual reason is sufficient. The substantial evidence supporting the various benefits can be found in the documents found in the Record of Proceedings, as defined herein.

B. OVERRIDING CONSIDERATIONS

Statement 1: The 2025 Blueprint provides a legal framework to guide future development that satisfies regulatory requirements.

The 2025 Blueprint promotes sustainable development. Population growth is anticipated to occur in the region irrespective of the 2025 Blueprint. The 2025 Blueprint provides a strategic framework to accommodate regional population growth at intensities that are appropriate with respect to existing development, environmental resources, available services and available infrastructure, and that reflect the existing and approved development in the region.

How and where this region's growth occurs over the next two decades is critical to the success of our economy and quality of life and to the preservation of our environment. The 2025 Blueprint's development pattern identifies the general location of different types of land uses, residential densities, employment intensities, and natural resource areas, although the ultimate size and location of these developments will be determined by local governments.

Statement 2: The 2025 Blueprint meets GHG emission reduction targets.

Today's air quality in the Sacramento region does not meet federal health standards for harmful elements associated with increased risks of asthma and other health conditions. Much of this problem is related to emissions generated by cars, trucks, and freight vehicles. Working to make our transportation system operate smoothly is important for reducing harmful air emissions, while people spending less time in congestion is also good news for the economy and families. Passenger vehicles account for roughly 30 percent of greenhouse gas emissions in California. Under Senate Bill 375 (SB 375), Metropolitan Planning Organizations like SACOG are responsible for guiding land use and transportation planning in a way that reduces greenhouse gas emissions from cars and light duty trucks. Under SB 375, CARB issues GHG targets for MPOs to reduce vehicle emissions, consistent with state climate goals.

For the 2025 Blueprint, CARB assigned SACOG a target of reducing per capita greenhouse gas emissions by 19 percent compared to a 2005 baseline. With implementation of the 2025 Blueprint, the region will achieve its climate goals and remain eligible for state transportation funding. It also continues to move the region towards lower levels of GHG and air pollution.

Statement 3: The 2025 Blueprint increases access to jobs and amenities.

The 2025 Blueprint results in better integration of future land use patterns and transportation investments, including higher levels of development near current and future transit corridors and CEQA incentives for residential and residential mixed-use projects that produce transportation and air quality benefits. The 2025 Blueprint complements planned land use changes with improvements in transportation options that increase residents' access to key destinations.

Statement 4: The 2025 Blueprint results in substantive improvements to the bicycle and pedestrian network and results in more complete streets.

The 2025 Blueprint includes direct investments in bicycle and pedestrian facilities. Implementation of the 2025 Blueprint would result in development of a connected system of facilities that provide safe and convenient bicycle and pedestrian travel throughout the region. The development of the regional network is oriented towards utilitarian trips and emphasizes connectivity to current facilities and connections to transit systems and key destinations. The 2025 Blueprint results in investment in a truly multi-modal transportation system, including complete streets, bicycle, and pedestrian facilities.

Statement 5: The 2025 Blueprint results in improved safety and travel time for goods movement.

The strategic investments of the 2025 Blueprint, including targeted bottleneck relief on highways and roadways, realignments and bypasses to improve or redirect traffic flow, and significant funding for road maintenance and improvements, results in a transportation system that improves safety and travel time for all vehicles, including goods movement vehicles.

Statement 7: The 2025 Blueprint results in diversity of housing types.

The 2025 Blueprint supports a housing product mix with a higher percentage of attached and small-lot single-family homes than the region has seen in the past; the diversity of housing types is responsive to the housing demand expected to occur over the next few decades.

Statement 8: The 2025 Blueprint reflects public and agency input.

While SACOG is responsible for developing and maintaining the MTP/SCS, transportation planning must be a collaborative process, as many different entities have responsibility for providing for the mobility needs of our region's residents and the SCS is required to reflect the land use planning happening at the local level. SACOG developed this plan in consultation with federal, state, and local agencies, transportation providers throughout the region, facility operators such as airports, transit operators, Native American tribal governments, environmental resource agencies, air districts, pedestrian and bicycle representatives, and other MPOs. To ensure the long-term health of the delta ecosystem, under the Delta Reform Act, SACOG also coordinates with the Delta Stewardship Council to consider and avoid negative impacts to the delta that would jeopardize this valuable resource. Finally, SACOG has emphasized public input in the development of the 2025 Blueprint plan to ensure that the 2025 Blueprint reflects the region's vision for the future. Those values and priorities have been incorporated into the plan's policies and programs.

C. CONCLUSION

The Board has balanced the competing goals and has chosen to accept certain environmental impacts because eliminating them would unduly compromise other important economic, fiscal, environmental, or land use goals. The Board finds and determines that the 2025 Blueprint and the supporting environmental documentation provide for a positive balance of the competing goals and that the economic, fiscal, environmental, land use or other benefits to be obtained by the 2025 Blueprint outweigh any environmental and related potential detriments from the 2025 Blueprint.

Therefore, the Board of Directors finds and determines that:

a) The Board of Directors' approval of the project as proposed will result in certain significant adverse environmental effects that cannot be avoided or reduced to a less-than-significant level even with the incorporation of all feasible mitigation measures into the project; and

b) There are no other feasible mitigation measures or feasible project alternatives that will further mitigate, avoid, or reduce the remaining significant environmental effects to a less-than-significant level.

Exhibit A

2025 Blueprint Mitigation Monitoring and Reporting Program

1 INTRODUCTION

This document constitutes the Mitigation Monitoring and Reporting Program (MMRP) for the Environmental Impact Report (EIR) prepared to analyze the Sacramento Area Council of Government's (SACOG's) 2025 Metropolitan Transportation Plan and Sustainable Communities Strategy (MTP/SCS, referred to herein as the 2025 Blueprint) Project.

The California Environmental Quality Act (CEQA) requires public agencies to report on and monitor measures adopted as part of the environmental review process (Public Resources Code section 21081.6 and CEQA Guidelines sections 15091(d) and 15097). This MMRP is designed to fulfill that requirement. This MMRP describes the actions that must take place as a part of each measure, the timing of these actions, the entity responsible for implementation, and the agency responsible for enforcing each action. The implementation and monitoring responsibilities, as described in this MMRP, reflect the role of local agencies in making project-level determinations regarding the applicability and feasibility of particular measures based on project-specific circumstances.

As required by Section 21081.6 of the Public Resources Code, the SACOG Custodian of Records is the "custodian of documents and other material" which constitutes the "record of proceedings" upon which the decision to adopt the 2025 Blueprint is based. Inquiries should be directed to:

Lanette Espinoza, Custodian of Records
(916) 321-9000
lespinoza@sacog.org

The physical location of this information is:

SACOG
1415 L Street, Floor 300
Sacramento, CA 95814

2 TABLE OF MEASURES

The MMRP table provided herein has been prepared to assist the responsible parties in implementing the mitigation measures. The table identifies the individual mitigation measures, mitigation timing, and monitoring responsibility. The numbering of mitigation measures follows the numbering sequence found in the EIR. Mitigation measures that are referenced more than once in the Draft EIR are not duplicated in the MMRP table.

Pursuant to PRC Sections 21155.2(a) and (b)(2) and Section 21159.28(a), in order to take advantage of CEQA streamlining benefits allowed under SB 375, projects that seek to tier from the 2025 Blueprint EIR must incorporate the mitigation measures identified in this MMRP or, if the identified mitigation is found to be infeasible based on substantial evidence, the project must incorporate equivalent measures that avoid or mitigate potential impacts to a less than significant level. Implementation and notification responsibilities fall on future project applicants or their designees unless otherwise specified and full compliance with the measures detailed herein shall be required.

Mitigation Monitoring and Reporting Program

Mitigation Measures	Implementation Requirement	Timing	Verification Action
Mitigation Measure 3.1-1: Protect Public Views of Important Scenic Vistas, Scenic Resources Along State Scenic Highways, and Visual Character and Quality The implementing agency shall protect public views of important scenic vistas, scenic resources, and visual character and quality by taking the following (or equivalent) actions for projects that would significantly affect such resources: ▶ require that the design of new development provide appropriate transitions in building height and bulk that are sensitive to the physical and visual character of adjoining neighborhoods that have lower development intensities and building heights; ▶ ensure building heights stepped back from sensitive adjoining uses to maintain appropriate transitions in scale and to protect scenic vistas; ▶ avoid siting electric towers, solar power facilities, wind power facilities, communication transmission facilities and/or above ground lines along scenic roadways and routes, to the maximum extent feasible; ▶ reduce visual effects of projects and activities such that they do not obscure, detract from, or substantially negatively affect the quality of views from designated scenic roadways or scenic highways through project design changes; and ▶ comply with other local general plan policies and regulations related to the protection of public views of important scenic vistas, scenic resources along a state scenic highway, and visual character and quality.	This mitigation measure will be considered by the lead agency for applicability at the project level.	Prior to approval of future projects.	The lead agency shall provide evidence that all applicable elements of the measure or equally effective measures have been satisfied.
Mitigation Measure 3.1-2: Design River Crossings to Minimize Aesthetic and Visual Impacts to the Greatest Feasible Extent The implementing agency shall design river crossings to protect public views of important scenic vistas, scenic resources along a state scenic highway, and visual character and quality. Such design elements could include: ▶ scale, features, and dimensions that are architecturally pleasing and contextually appropriate for the adjacent neighborhoods; ▶ sizing that meets but does not exceed the capacity of the approach roadway; and ▶ design elements that obscure, detract from, or negatively affect the quality of views from public viewing areas shall be prohibited.	This mitigation measure will be considered by the lead agency for applicability at the project level.	Prior to approval of future projects.	The lead agency shall provide evidence that all applicable elements of the measure or equally effective measures have been satisfied.

Mitigation Measures	Implementation Requirement	Timing	Verification Action
Mitigation Measure 3.1-3: Design Projects to be Visually Compatible with Surrounding Areas The implementing agency shall require measures for projects that would significantly affect visual resources that minimize contrasts in scale and massing between the project and surrounding natural forms and developments. Strategies to achieve this may include: ▶ to the extent feasible, avoiding large cuts and fills when the visual environment would be substantially disrupted; ▶ siting or designing projects to minimize their intrusion into important viewsheds; ▶ using contour grading to match surrounding terrain; ▶ developing transportation systems to be compatible with the surrounding environments (e.g., colors and materials of construction material; scale of improvements); ▶ avoiding the use of non-native landscaping; if exotic vegetation is used, it should be used as screening and landscaping that blends in and complements the natural landscape; ▶ protecting or replacing aesthetically significant trees in the project area; ▶ using grading that blends with the adjacent landforms and topography; ▶ landscaping new slopes and embankments with compatible grasses, shrubs, and trees to soften cuts and edges; and ▶ designing new structures to be compatible in scale, mass, character, and architecture with existing structures.	This mitigation measure will be considered by the lead agency for applicability at the project level.	Prior to approval of future projects.	The lead agency shall provide evidence that all applicable elements of the measure or equally effective measures have been satisfied.
Mitigation Measure 3.1-4: Reduce Sun Glare Resulting from Implementation of Planned Transportation Improvements The implementing agency shall require measures that would minimize and control glare from planned transportation improvements that would result in significant glare impacts through the adoption of project design features that reduce glare. These features could include: ▶ planting trees along transportation corridors to reduce glare from the sun; ▶ creating tree wells in existing sidewalks; ▶ adding trees in new curb extensions and traffic circles; ▶ adding trees to public parks and greenways; and ▶ landscaping off-street parking areas, loading areas, and service areas. Tree species planted to comply with this measure shall provide significant shade cover when mature. Utilities shall be installed underground along these routes wherever feasible to allow trees to grow and provide shade without need for severe pruning.	This mitigation measure will be considered by the lead agency for applicability at the project level.	Prior to approval of future projects.	The lead agency shall provide evidence that all applicable elements of the measure or equally effective measures have been satisfied.

Mitigation Measures	Implementation Requirement	Timing	Verification Action
Mitigation Measure 3.1-5: Design Structures to Avoid or Reduce Impacts Resulting from Sun Glare The implementing agency shall require measures that would minimize and control glare from implementation of the projected land use pattern and planned transportation improvements through the adoption of project design features that reduce glare for projects that would cause significant glare impacts. These features could include: ▸ limiting the use of reflective materials, such as metal; ▸ using non-reflective material, such as paint, vegetative screening, matte finish coatings, and masonry; ▸ screening parking areas by using vegetation or trees; ▸ using low-reflective glass; and ▸ complying with applicable general plan policies or local controls related to glare.	This mitigation measure will be considered by the lead agency for applicability at the project level.	Prior to approval of future projects.	The lead agency shall provide evidence that all applicable elements of the measure or equally effective measures have been satisfied.
Mitigation Measure 3.1-6: Design Structures to Avoid or Reduce Impacts Resulting from Nighttime Light and Glare The implementing agency shall impose lighting standards on projects that would cause significant nighttime light and glare impacts that ensure that minimum safety and security needs are addressed and minimize light trespass and glare. These standards could include the following: ▸ minimizing incidental spillover of light onto adjacent private properties and undeveloped open space, ▸ directing luminaries away from habitat and open space areas adjacent to the project sites, ▸ installing luminaries with a minimum Color Rendering Index rating of 90 which provides good color rendering and natural light qualities, and ▸ minimizing the potential for back scatter into the nighttime sky and for incidental spillover of light onto adjacent private properties and undeveloped open space.	This mitigation measure will be considered by the lead agency for applicability at the project level.	Prior to approval of future projects.	The lead agency shall provide evidence that all applicable elements of the measure or equally effective measures have been satisfied.
Mitigation Measure 3.2-1: Provide for Permanent Protection of Farmland The implementing agency shall mitigate loss of such farmland by adopting measures that may include but are not limited to the following: ▸ Provide permanent protection of in-kind farmland at a minimum 1:1 ratio of comparable quality land, in the form of easements, fees, or elimination of development rights/potential. ▸ Locate the easement within the same city or community or city in which the conversion occurs; if easements within the same community or city are not available or otherwise feasible to obtain, the easement shall be in as close proximity as possible to the same city or community in which the conversion occurs.	This mitigation measure will be considered by the lead agency for applicability at the project level.	Prior to approval of future projects.	The lead agency shall provide evidence that all applicable elements of the measure or equally effective measures have been satisfied.
Mitigation Measure 3.2-2: Provide for Permanent Protection of Forest Land and Timberland The implementing agency shall mitigate for loss of forest land or timberland by providing permanent protection of in-kind forest land or timberland at a minimum 1:1 ratio of comparable quality land, in the form of easements, fees, or elimination of development rights/potential. If feasible, the easement should be located within or in close proximity to the land that is converted.	This mitigation measure will be considered by the lead agency for applicability at the project level.	Prior to approval of future projects.	The lead agency shall provide evidence that all applicable elements of the measure or equally effective measures have been satisfied.

Mitigation Measures	Implementation Requirement	Timing	Verification Action
Mitigation Measure 3.2-3: Minimize Indirect Conversion of Farmland to Non-Agricultural Use Implementing agencies shall require project proponents to: ▸ Design proposed projects to minimize, to the greatest extent feasible, the loss of the highest valued farmland. ▸ Redesign project features to minimize fragmenting or isolating farmland. Where a project involves acquiring land or easements, ensure that the remaining farmland is of a size sufficient to allow economically viable farming operations. This would avoid the fragmentation or isolation of farmland in a way that would not allow for economically viable farming operations which could increase the risk of it being indirectly converted to non-agricultural uses. The project proponents shall be responsible for acquiring easements, making lot line adjustments, and merging affected land parcels into units suitable for continued commercial agricultural management. ▸ Reconnect utilities or infrastructure that serve agricultural uses if these are disturbed by project construction. If a project temporarily or permanently cuts off roadway access or removes utility lines, irrigation features, or other infrastructure, the project proponents shall be responsible for restoring access as necessary to ensure that economically viable farming operations are not interrupted. ▸ Manage project operations to minimize the introduction of invasive species or weeds that may affect agricultural production on adjacent agricultural land. Where a project has the potential to introduce sensitive species or habitats or have other spill-over effects on nearby agricultural lands, the project proponents shall be responsible for acquiring easements on nearby agricultural land and/or financially compensating for indirect effects on nearby agricultural land. Easements (e.g., flowage easements) shall be required for temporary or intermittent interruption in farming activities (e.g., because of seasonal flooding or groundwater seepage). Acquisition or compensation would be required for permanent or significant loss of economically viable operations. ▸ Align corridors, incorporate buffer zones and setbacks, and integrate berms and fencing to avoid agricultural lands and to reduce conflicts with agricultural lands. ▸ Minimize severance and fragmentation of agricultural land by constructing underpasses and overpasses at reasonable intervals to provide property access. ▸ Provide buffers, berms, setbacks, fencing, or other project design measures to protect surrounding agriculture, and to reduce conflict with farming that could result from implementation of transportation improvements and/or projected land use pattern included as a part of the 2025 Blueprint. ▸ Implement other feasible conservation tools, such as those recommended by the California Department of Conservation Division of Land Resource Protection. ▸ Require project applicants to agree to provide real estate disclosures explaining farmers' rights to purchasers or lessees as a condition of project approval for projects located in active farming areas. ▸ Incorporate the use of agricultural buffers, as appropriate, to reduce land use conflicts with farming operations.	This mitigation measure will be considered by the lead agency for applicability at the project level.	Prior to approval of future projects.	The lead agency shall provide evidence that all applicable elements of the measure or equally effective measures have been satisfied.

Mitigation Measures	Implementation Requirement	Timing	Verification Action
Mitigation Measure 3.2-4: Manage Growth at the Rural-Urban Interface to Support the Long-Term Viability of Agriculture The implementing agency shall avoid or minimize pressure to convert agriculture land at the urban edge to non-agricultural uses by adopting regulations that enforce the innovations and best practices identified to minimize conversion pressures on farmland. Examples include but are not limited to: ▸ **Agriculture Buffers:** Buffers, generally imposed on new development, can assist in reducing urban land use conflicts with farming operations. Invest in urban edge agricultural operations that reinforce the effectiveness and permanence of buffers, create education and training opportunities, and generate a revenue stream that supports buffer acquisition and maintenance. ▸ **Right-to-Farm Ordinances:** These ordinances require project applicants to agree to provide real estate disclosures explaining farmers' rights to purchasers or lessees as a condition of project approval for projects located in active farming areas. The intent of such an ordinance is to protect farmers from nuisance complaints and enforcement actions. ▸ **Infill and Redevelopment Policies**: These policies, which are supportive of infill and redevelopment and consistent with the policy objectives of the 2025 Blueprint and SB 375, would direct population growth to urban communities, or in established rural communities, thereby reducing pressure to convert agricultural land to development.	This mitigation measure will be considered by the lead agency for applicability at the project level.	Prior to approval of future projects.	The lead agency shall provide evidence that all applicable elements of the measure or equally effective measures have been satisfied.
Mitigation Measure 3.3-1: Require Applicable Design Measures Implementing agencies shall require projects that exceed the long-term operational thresholds to mitigate the air quality impacts to below such thresholds using applicable and feasible mitigation, as defined by the local air district. Examples of design measures that would reduce criteria pollutant emissions include, but are not limited to: ▸ use of energy-efficient lighting and process systems (e.g., low-NO_X water heaters and boiler units); ▸ design streets to maximize pedestrian access to transit stops; ▸ include bus shelters at transit access points where deemed appropriate by local public transit operator in large residential, commercial, and industrial projects; ▸ equip residential structures with electric outlets in the front and rear of the structure to facilitate use of electrical lawn and garden equipment; ▸ provide for, or contribute to, dedication of land for off-site Class I and Class II bicycle facilities linking the project to designated bicycle commuting routes in accordance with the regional bikeway master plan; ▸ contribute to the provision of synchronized traffic signals on roadways affected by the project and as deemed necessary by the local public works department; ▸ provide transit-enhancing infrastructure that includes bus turnouts or bulbs, passenger benches, street lighting, route signs and displays, and shelters as demand and service routes warrant, subject to review and approval by local transportation planning agencies; ▸ provide pedestrian-enhancing infrastructure that includes sidewalks and pedestrian paths, direct pedestrian connections, street trees to shade sidewalks, pedestrian safety designs and infrastructure, street furniture and artwork, street lighting, pedestrian signalization and signage, and/or access between bus service and major transportation points within the project; ▸ include neighborhood park(s) or other recreational options, such as trails, within the development to minimize vehicle travel to off-site recreational and/or commercial uses; ▸ install solar water heaters;	This mitigation measure will be considered by the lead agency for applicability at the project level.	Prior to approval of future projects.	The lead agency shall provide evidence that all applicable elements of the measure or equally effective measures have been satisfied.

Mitigation Measures	Implementation Requirement	Timing	Verification Action
▸ incorporate mixed uses, where permitted by local development regulations, to achieve a balance of commercial, employment, and housing options on the project site; ▸ contribute to traffic-flow improvements (e.g., right-of-way, capital improvements) that reduce traffic congestion and do not substantially increase roadway capacity; ▸ provide preferential parking spaces for carpool and vanpool vehicles, implement parking fees for single-occupancy vehicle commuters, and implement parking cash-out program for employees; ▸ use clean fuel vehicles in the vehicle fleet; ▸ require all employment centers to include an adequate number of on-site shower/locker facilities for bicycling and pedestrian commuters (typically one shower and three lockers for every 25 employees per shift); ▸ construct/contribute to bicycle and pedestrian facility improvements; ▸ provide ancillary services (e.g., cafeterias, health clubs, automatic tellers, and post offices) within walking distance of proposed development (no further than 1,500 feet) as appropriate and in compliance with local development regulations; ▸ provide park-and-ride lots as deemed feasible and appropriate by transportation planning agencies; ▸ employment centers that exceed a designated size, as measured by the number of employees, shall provide on-site child care and after-school facilities or contribute to off-site construction of such facilities within walking distance of employment land uses (for employment centers on or adjacent to industrial land uses, on-site child daycare centers shall be provided only if supported by the findings of a comprehensive health risk assessment (HRA) performed in consultation with the local air district); ▸ provide on-site pedestrian facility enhancements, such as walkways, benches, proper lighting, vending machines, and building access that are physically separated from parking lot traffic; ▸ offer alternative work schedules, where practical, that allow for work hours that are compressed into fewer than 5 days (e.g., 9/80, 4/40, or 3/36 schedules), or allow flextime schedules; ▸ provide transit amenities (e.g., on-site and off-site bus turnouts, passenger benches, or shelters) where deemed appropriate by local transportation planning agencies; ▸ contribute to the provision of synchronized traffic signals on roadways affected by the proposed project and as deemed necessary by the local public works department; ▸ provide video conferencing facilities; ▸ commit to support programs that include guaranteed ride home, subsidized transit passes, and rideshare matching; ▸ provide transportation (e.g., shuttles) to major transit stations and multimodal centers; ▸ require each employer employment center (more than 25 employees) to assign a transportation coordinator for the applicable Transportation Management Association (TMA); ▸ require all employers to install a permanent display in employee common areas of alternate transit information, as determined by the requirements of the TMA; ▸ require employers or employment centers (more than 25 employees) to implement a guaranteed ride home program; ▸ require employers or employment centers (more than 25 employees) to implement an incentive program for riding transit, carpooling, vanpooling, biking, and walking instead of driving a single-occupancy vehicle to work, and design and locate buildings to facilitate transit access;			

Mitigation Measures	Implementation Requirement	Timing	Verification Action
▸ install Energy Star (or equivalent) cool roofing systems on all buildings; ▸ design shuttle and transit exits to adjoining streets to reduce time to reenter traffic from the project site; ▸ increase wall and attic insulation to 20 percent above Title 24 requirements (residential and commercial); ▸ orient buildings to take advantage of solar heating and natural cooling, and use passive solar designs (residential, commercial, and industrial); ▸ provide energy-efficient windows (double pane and/or Low-E) and awnings or other shading mechanisms for windows, porches, patios, and walkways; ▸ include passive solar cooling and heating features in designs, as well as ceiling and whole house fans; ▸ include programmable thermostats in the design of heating and cooling systems; and ▸ use day lighting systems, such as skylights, light shelves, and interior transom windows. See also Chapter 3, "Measures to Reduce GHG Emissions," in CAPCOA's *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity* (CAPCOA Handbook) for additional reduction measures (CAPCOA 2024). Although the CAPCOA Handbook focuses on GHG reduction measures, co-benefits of many measures include criteria pollutant emission reductions. Future project proponents shall use the CAPCOA Handbook to develop measures to reduce emissions to below thresholds if significant impacts are identified.			
Mitigation Measure 3.3-2: Require Applicable Construction Measures Lead agencies shall require project applicants, prior to and during construction, to implement construction mitigation measures that, at a minimum, meet the requirements of the applicable air district with jurisdiction over the area in which construction activity would occur if the project is anticipated to exceed thresholds of significance for short-term criteria air pollutant emissions. Projects that exceed these thresholds shall mitigate the air quality impacts using all applicable and feasible mitigation. For construction activity on the project site that is anticipated to exceed thresholds of significance, the project applicant(s) shall require construction contractors to implement both Standard Mitigation Measures and Best Available Mitigation Measures for Construction Activity to reduce emissions for all construction activity performed in the plan area. Examples of mitigation measures could include, but not limited to, the following: ▸ The project proponent or their primary contractor shall implement a Fugitive Dust Control Plan. ▸ All grading operations on a project shall be suspended when winds exceed 20 mph or when winds carry dust beyond the property line despite implementation of all feasible dust control measures. ▸ Construction sites shall be watered as directed by the local air district and as necessary to prevent fugitive dust violations. ▸ An operational water truck shall be on-site at all times. Water shall be applied to control dust as needed to prevent visible emissions violations and off-site dust impacts. ▸ On-site dirt piles or other stockpiled particulate matter shall be covered, wind breaks installed, and water and/or soil stabilizers employed to reduce wind-blown dust emissions. The use of approved nontoxic soil stabilizers shall be incorporated according to manufacturers' specifications to all inactive construction areas. ▸ All transfer processes involving a free fall of soil or other particulate matter shall be operated in such a manner as to minimize the free fall distance and fugitive dust emissions.	This mitigation measure will be considered by the lead agency for applicability at the project level.	Prior to approval of future projects.	The lead agency shall provide evidence that all applicable elements of the measure or equally effective measures have been satisfied.

Mitigation Measures	Implementation Requirement	Timing	Verification Action
▸ Approved chemical soil stabilizers shall be applied according to the manufacturers' specifications to all inactive construction areas (previously graded areas that remain inactive for 96 hours), including unpaved roads and employee/equipment parking areas. ▸ To prevent track-out, wheel washers shall be installed where project vehicles and/or equipment exit onto paved streets from unpaved roads. Vehicles and/or equipment shall be washed before each trip. Alternatively, a gravel bed may be installed as appropriate at vehicle/equipment site exit points to effectively remove soil buildup on tires and tracks and prevent/diminish track-out. ▸ Paved streets shall be swept frequently (water sweeper with reclaimed water recommended; wet broom permitted) if soil material has been carried onto adjacent paved, public thoroughfares from the project site. ▸ Temporary traffic control shall be provided as needed during all phases of construction to improve traffic flow, as deemed appropriate by the applicable department of public works and/or California Department of Transportation (Caltrans), and to reduce vehicle dust emissions. An effective measure is to enforce vehicle traffic speeds at or below 15 mph. ▸ Traffic speeds on all unpaved surfaces shall be reduced to 15 mph or less, and unnecessary vehicle traffic shall be reduced by restricting access. Appropriate training for truck and equipment drivers, on-site enforcement, and signage shall be provided. ▸ Ground cover shall be reestablished on the construction site as soon as possible and before final occupancy through seeding and watering. ▸ Open burning shall be prohibited at the project site. No open burning of vegetative waste (natural plant growth wastes) or other legal or illegal burn materials (e.g., trash, demolition debris) may be conducted at the project site. Vegetative waste shall be chipped or delivered to waste-to-energy facilities (permitted biomass facilities), mulched, composted, or used for firewood. It is unlawful to haul waste materials off-site for disposal by open burning. ▸ The primary contractor shall be responsible for ensuring that all construction equipment is properly tuned and maintained before and for the duration of on-site operation. ▸ Existing power sources (e.g., power poles) or clean-fuel generators shall be used rather than temporary power generators. ▸ A traffic plan shall be developed to minimize traffic flow interference from construction activities. The plan may include advance public notice of routing, use of public transportation, and satellite parking areas with a shuttle service. Operations that affect traffic shall be scheduled for off-peak hours. Obstruction of through-traffic lanes shall be minimized. A flag person shall be provided to guide traffic properly and ensure safety at construction sites. ▸ The project proponent or their primary contractor shall assemble a comprehensive initial inventory (i.e., make, model, engine year, horsepower, emission rates) of all heavy-duty off-road (portable and mobile) equipment (50 horsepower and greater) that would be used an aggregate of 40 or more hours for the construction project and provide a plan for approval by the local air district demonstrating that the heavy-duty (equal to or greater than 50 horsepower) off-road equipment to be used for construction, including owned, leased, and subcontractor vehicles, shall achieve a project-wide fleet-average 10 percent NOX reduction compared to the most recent CARB fleet average at the time of construction. These equipment emission reductions can be demonstrated using the most recent version of the Construction Mitigation Calculator developed by the SMAQMD. Acceptable options for reducing emissions may include use of late-model engines, low-emission diesel products, alternative fuels, engine retrofit technology (Carl Moyer Guidelines), after-treatment products,			

Mitigation Measures	Implementation Requirement	Timing	Verification Action
voluntary off-site mitigation projects, the provision of funds for air district off-site mitigation projects, and/or other options as they become available. In addition, implementation of these measures would also result in a 5 percent reduction in ROG emissions from heavy-duty diesel equipment. The local air district shall be contacted to discuss alternative measures.			
Mitigation Measure 3.3-3: Conduct a Site-Specific Health Risk Assessment Where sensitive land uses or TAC sources meeting CARB's criteria in size and activity (i.e., heavy-duty trucks routes, stationary sources requiring air district permits) would be sited within the minimum CARB-recommended distances, and there is reason to presume that the project would create or exacerbate impacts associated with TACs, a screening-level HRA, and, if warranted, a site-specific HRA, shall be conducted to determine all feasible mitigation and best practices. Identified feasible mitigations and best practices shall be implemented to reduce receptor cancer risks below 10 in one million or an acute hazard index of less than one. The HRA protocols of the applicable local air districts shall be followed or, where a district/office does not have adopted protocols, the protocol of SMAQMD or CAPCOA shall be followed. Note that the MSAT Protocol only applies to Sacramento County; however, many of the recommendations still apply in other areas. In addition, the MSAT Protocol addresses DPM and other MSATs. Best practices shall be applied as recommended and applicable, to reduce the impact to a less-than-significant level where feasible. The HRA should give particular attention to the nature of the receptor, recognizing that some receptors are particularly sensitive (e.g., schools, day care centers, assisted living and senior centers, and hospitals) and may require special measures. Examples of best practices that studies have suggested to be effective include: ▶ install, operate, and maintain in good working order a central heating, ventilation, and air conditioning (HVAC) system or other air intake system in the building, or in each individual unit, that meets or exceeds a minimum efficiency reporting value (MERV) of 13, a Micro-Particle Performance Rating (MPR) of at least 1500, or Filter Performance Rating (FPR) of at least 10 (which is equivalent to an MPR of 1500), and includes either high efficiency particulate air (HEPA) filters or American Society of Heating, Refrigeration, and Air-Conditioning Engineers (ASHRAE) certified 85 percent or higher; ▶ install passive (drop-in) electrostatic filtering systems, especially those with low air velocities (i.e., 1 mile per hour [mph]), as a part of the HVAC project HVAC system(s); ▶ maintain, repair, and/or replace the HVAC system on an ongoing and as needed basis or prepare an operation and maintenance manual for the HVAC system and the filter, for inclusion in the Covenants, Conditions and Restrictions (CC&Rs) for residential projects and a separate homeowners manual; ▶ orient air intakes away from TAC sources or provide shields or buffers to the maximum extent possible; maintain a vegetative barrier between new residential units consisting of tree species with year-round foliage and a porosity of 20 or 40 percent wherever feasible; and ▶ use tiered tree planting between roadways and sensitive receptors wherever feasible, using native, needled (coniferous) species, ensure a permanent irrigation source, and provide permanent funding to maintain and care for the trees. Additionally, implementing agencies should contact the applicable air district and/or CAPCOA for the most current list of applicable best practices for limiting exposure of sensitive receptors to substantial TAC concentrations consistent with the CARB Handbook and MSAT Protocol Guidance Document.	This mitigation measure will be considered by the lead agency for applicability at the project level.	Prior to approval of future projects.	The lead agency shall provide evidence that all applicable elements of the measure or equally effective measures have been satisfied.

Mitigation Measures	Implementation Requirement	Timing	Verification Action
Mitigation Measure 3.3-4: Implement the Strategies Contained in the CARB Technical Advisory The implementing agency shall implement the strategies identified in the CARB Technical Advisory to reduce air pollution exposure near high-volume roadways to less-than-significant levels, where feasible. Examples of effective strategies include (CARB 2017): ▸ use of speed reduction mechanisms such as roundabouts to reduce the frequency of stop-and-go driving common among streets that support stop signs; ▸ use of traffic signal management to limit the frequency of stop-and-go driving and vehicle idling; ▸ enforcement and establishment of speed limit reductions of high-speed roadways; ▸ use of design elements that promote air flow and pollutant dispersion along street corridors to optimize air flow, building downwash, and pollution dispersal; ▸ incorporate bike lanes and sidewalks to promote alternative, zero-pollution modes of transportation; and ▸ construct solid barriers directly adjacent to high-volume roadways such as sound walls to improve downwash.	This mitigation measure will be considered by the lead agency for applicability at the project level.	Prior to approval of future projects.	The lead agency shall provide evidence that all applicable elements of the measure or equally effective measures have been satisfied.
Mitigation Measure 3.3-5: Require Construction Health Risk Assessment A site-specific HRA shall be required for all construction projects anticipated to last more than six months and located within 1,000 feet of sensitive receptors (as defined in California Health and Safety Code Section 42705.5[a][5]) regardless of intensity of construction. All recommendations from the HRA shall be enforced as conditions of approval of the development and the implementing agency shall require implementation of all feasible measures to reduce impacts to a less than significant level.	This mitigation measure will be considered by the lead agency for applicability at the project level.	Prior to approval of future projects.	The lead agency shall provide evidence that all applicable elements of the measure or equally effective measures have been satisfied.
Mitigation Measure 3.3-6: Require Applicable Local Air District Measures and Best Practices Related to Odors Implementing agencies shall require assessment of new and existing odor sources for individual non-agricultural land use projects to determine whether sensitive receptors would be exposed to objectionable odors and apply recommended applicable mitigation measures as defined by the applicable local air district and best practices. Examples of mitigation measures that may be applied where feasible and necessary to address site-specific impacts, include but are not limited to: ▸ Proposed industrial, commercial, or convenience land uses (e.g., fast-food restaurants, painting operations) that have the potential to emit objectionable odors shall be located as far away as feasibly possible from existing and proposed sensitive receptors and oriented where possible to place buildings or other obstructions between the odor source and downwind receptors. ▸ The odor-producing potential of land uses shall be considered when the type of facility that would occupy industrial, commercial, or convenience areas is considered. ▸ If an odor-emitting facility is to occupy space in the industrial, commercial, or convenience area, the odor-producing potential of the source and potential control devices shall be determined in coordination with the local air district and shall be based on the number of complaints associated with existing sources of the same nature. Odor-control devices (e.g., wet chemical scrubbers, HVAC filters, activated carbon scrubbers, biologically active filters, enclosures) shall be identified in the improvement plans before the approval of building permits. The odor-control devices shall be installed before the issuance of certificates of occupancy for the potentially odor-producing use. ▸ Require notification to incoming property owners (e.g., real estate disclosures) regarding the existence of pre-existing odor-emitting facilities or operations (e.g., similar to avigation easements for noise).	This mitigation measure will be considered by the lead agency for applicability at the project level.	Prior to approval of future projects.	The lead agency shall provide evidence that all applicable elements of the measure or equally effective measures have been satisfied.

Mitigation Measures	Implementation Requirement	Timing	Verification Action
Also, see specifically SMAQMD's Guide to Air Quality Assessment in Sacramento County, which.an extensive list of technology- and design-based odor reduction measures in its Technology- and Design-Based Odor Reduction Measures appendix.			
Mitigation Measure 3.4-1: Conduct a Biological Resources Assessment Prior to initiation of construction or other ground disturbing activities the implementing agency will conduct, or require an applicant to conduct, a preliminary biological analysis for the project site that will include review of Section 3.4.2, "Environmental Setting," Appendix C-2, Appendix C-3, any relevant HCP, NCCP, CARP, or ILF Program as well as current queries of CNDDB, CNPS Inventory, and USFWS IPaC, and a reconnaissance-level survey of the project site. If it is determined during the preliminary biological analysis that the project may have adverse impacts on habitats that could support special-status species or other sensitive biological resources (e.g., wetlands, nursery sites, sensitive natural communities) and these habitats cannot be avoided, the implementing agency will require a qualified biologist to conduct project specific land cover and habitat mapping (including delineation of aquatic resources if any are present), and a habitat assessment of the area of impact to identify whether any special-status plant or wildlife species habitat, sensitive natural communities, riparian habitat, or other sensitive habitats, wetlands, wildlife movement corridors, or wildlife nursery sites could be affected by construction activities. If it is determined during the preliminary biological analysis that sensitive natural communities have potential to occur in the project impact area, the implementing agency will identify and map on-site vegetation to the alliance level following standards described in the most current edition of *A Manual of California Vegetation* (including updated natural communities data at http://vegetation.cnps.org/). Additionally, the biologist will determine whether any local policies or ordinances intended to protect biological resources (e.g., tree removal policies) would apply, and whether construction activities would result in conflicts with these policies or ordinances. The data reviewed will include the Biological Resources setting of this Draft EIR (see Section 3.4.2, "Environmental Setting"), and the best available current data for the area, including vegetation mapping data, species distribution information, CNDDB, CNPS Inventory of Rare and Endangered Plants of California, and relevant general plans, HCPs, and NCCPs. The biological resources assessment will be completed at a time of year that is appropriate for identifying habitat and no more than 1 year prior to initiation of construction activities. A qualified biologist will: ▸ hold a wildlife biology, botany, ecology, forestry, or other relevant degree from an accredited university, ▸ be knowledgeable in relevant species life histories and ecology, ▸ be able to correctly identify relevant species and habitats, ▸ be knowledgeable about survey protocols, ▸ be knowledgeable about state and federal laws regarding the protection of special-status species, and ▸ have experience with CDFW's CNDDB and Biogeographic Information and Observation System (BIOS). If the qualified biologist determines that the land within and in the vicinity of the area of impact does not contain habitat potentially suitable for special-status plant or wildlife species, sensitive natural communities, riparian habitat, or other sensitive habitats, wetlands, wildlife movement corridors, or native wildlife nursery sites, construction activities would not result in adverse effects on these resources and project implementation would not result in conflict with a local policy or ordinance or an adopted HCP or NCCP. The biologist will document these findings in a letter report to the implementing agency, and no further mitigation is required.	This mitigation measure will be considered by the lead agency for applicability at the project level.	Prior to approval of future projects.	The lead agency shall provide evidence that all applicable elements of the measure or equally effective measures have been satisfied.

Mitigation Measures	Implementation Requirement	Timing	Verification Action
Mitigation Measure 3.4-2: Identify Special-Status Plant Species, and Avoid, Minimize, and Mitigate Impacts If the qualified biologist, after implementation of Mitigation Measure 3.4-1, determines that habitat potentially suitable for special-status plants is present within the area of impact and could be adversely affected by construction activities, then the following measures will be implemented: ▸ Eleven special-status plant species (one of which constitutes two subspecies) are covered under adopted HCPs or NCCPs within the plan area (Natomas Basin HCP, South Sacramento HCP, Western Placer County HCP/NCCP, and Yolo HCP/NCCP; Appendix C-2). If a project is within the plan area of an adopted HCP or NCCP, and the project qualifies as a covered activity under the HCP or NCCP, then the implementing agency may seek coverage under the plan. If permitting through an adopted HCP or NCCP is pursued, the implementing agency will be required to meet the permit conditions and other requirements established in the plan's Implementing Agreement, which often includes (depending on the plan) submitting a complete application package, paying required fees, fulfilling any appropriate survey requirements, and complying with all applicable conservation measures. ▸ For projects that are not within the plan area of an adopted HCP or NCCP or if special-status plant species that are not covered under an adopted HCP or NCCP may be present within the area of impact, the following measures will apply: ▪ Prior to project initiation and during the blooming period for special-status plant species with potential to occur in the area of impact, a qualified botanist will conduct protocol-level surveys for special-status plants in accordance with *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (CDFW 2018 or current version). A qualified botanist will: • be knowledgeable about plant taxonomy, • be familiar with plants of the region, including special-status plants and sensitive natural communities, • have experience conducting floristic botanical field surveys as described in the CDFW Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities, • be familiar with *The Manual of California Vegetation* (Sawyer et al. 2009 or current version, including updated natural communities data at http://vegetation.cnps.org/), and • be familiar with federal, state, and local statutes and regulations related to plants and plant collecting. ▪ If no special-status plants are found during the protocol-level survey, the botanist will document the findings in a letter report to USFWS or CDFW, as appropriate depending on species status, and the implementing agency and no further mitigation will be required. ▪ If special-status plant species are found that cannot be avoided during construction, the implementing agency will consult with CDFW or USFWS to determine the appropriate mitigation measures for direct and indirect impacts that could occur as a result of project construction. The implementing agency will implement the agreed-upon mitigation measures to compensate for the loss of occupied habitat or individuals. Mitigation measures may include preserving and enhancing existing populations, creation of off-site populations on project mitigation sites through seed collection or transplantation, and/or restoring occupied habitat in sufficient quantities to offset the loss of occupied habitat and/or individuals.	This mitigation measure will be considered by the lead agency for applicability at the project level.	Prior to approval of future projects.	The lead agency shall provide evidence that all applicable elements of the measure or equally effective measures have been satisfied.

Mitigation Measures	Implementation Requirement	Timing	Verification Action
Mitigation Measure 3.4-3: Identify Special-Status Wildlife and Avoid, Minimize, and Mitigate Impacts If the qualified biologist, after implementation of Mitigation Measure 3.4-1, determines that habitat potentially suitable for special-status wildlife is present within the area of impact and could be adversely affected by construction activities, then the following measures will be implemented: ▸ Thirty- two special-status wildlife species are covered under adopted HCPs or NCCPs within the plan area (Natomas Basin HCP, South Sacramento HCP, Western Placer County HCP/NCCP, and Yolo HCP/NCCP; Appendix C-2). If a project is within the plan area of an adopted HCP or NCCP, and the project qualifies as a covered activity under the HCP or NCCP, then the implementing agency may seek coverage under the plan. If permitting through an adopted HCP or NCCP is pursued, the implementing agency will be required to meet the permit conditions and other requirements established in the plan's Implementing Agreement, which often includes (depending on the plan) submitting a complete application package, paying required fees, fulfilling any appropriate survey requirements, and complying with all applicable conservation measures. ▸ For projects that are not within the plan area of an adopted HCP or NCCP or if special-status wildlife species that are not covered under an adopted HCP or NCCP may be present within the area of impact due to the presence of habitat potentially suitable for the species, protocol-level surveys (where applicable), preconstruction surveys, and avoidance and minimization measures will be required. Surveys will be conducted by a qualified biologist with the proper handling permits, as applicable. Acceptable species-specific survey procedures will be developed in consultation with CDFW or USFWS, as appropriate depending on species status. Alternatively, if habitat potentially suitable for the special-status species is determined to be present within the area of impact, presence of special-status species may be assumed instead of confirmed with surveys. Consultation with CDFW, USFWS, and/or NOAA Fisheries may also be required, depending on the type of impact and the species involved. Refer to the Avoidance and Minimization Measures below for each special-status wildlife species with potential to occur in the plan area and apply to the project as applicable and feasible. <u>Avoidance and Minimization Measures</u> **California Red-Legged Frog** ▸ If habitat potentially suitable for California red-legged frog is determined to be present within or in the vicinity of the area of impact, the implementing agency will retain a USFWS-approved biologist to conduct a pre-construction survey for California red-legged frog within the area of impact, which will be conducted in accordance with the *Revised Guidance on Site Assessments and Field Surveys for the California Red-legged Frog* (USFWS 2005) protocol no more than one year prior to the commencement of project construction activities. Consultation with USFWS should be conducted as soon as possible during the early planning stages of an individual project. ▸ If no California red-legged frogs are found, further mitigation will not be required. ▸ If California red-legged frog adults, tadpoles, or eggs are found, the biologist will contact USFWS and CDFW to determine whether relocating the species is appropriate. If the agencies approve of relocation, a USFWS-approved biologist will be allowed sufficient time to move the species from the work site before work activities begin. ▸ The biologist will conduct environmental awareness training for all construction personnel on required avoidance procedures and protocols if a California red-legged frog enters an active construction zone.	This mitigation measure will be considered by the lead agency for applicability at the project level.	Prior to approval of future projects.	The lead agency shall provide evidence that all applicable elements of the measure or equally effective measures have been satisfied.

Mitigation Measures	Implementation Requirement	Timing	Verification Action
▸ To the extent practicable, construction will not occur during the wet season, when California red-legged frogs are more likely to disperse through upland habitats. Work within all waters, wetlands, and the riparian corridor will be limited to the period from April 15 to October 15, except for vegetation clearing. ▸ For work conducted during the California red-legged frog migration season (November 1 through May 31), the following will apply: ▪ Flagging will be placed around the area of impact during ground-disturbing activities after hand excavation of burrows has been completed. Flagging will also be placed around all spoils and stockpiles. No project activities will occur in the flagged area. A qualified biologist will visit the site weekly to ensure that the flagging is in good working condition. Flagging design will be subject to the approval of USFWS. If flagging is not used, a qualified biological monitor will be on-site during all ground disturbance activities. ▪ A qualified biologist will survey the area of impact (including access roads) in mornings following measurable precipitation events. Construction may commence once the biologist has confirmed that no California red-legged frogs are in the work area. ▸ Each day that work is conducted, the following will apply: ▪ Prior to beginning work each day, underneath equipment and stored pipes greater than 1.2 inches in diameter will be inspected for California red-legged frogs. If any are found, they will be allowed to move out of the construction area. ▪ Trenches and holes within the area of impact will be covered and inspected daily for stranded individuals. Trenches and holes deeper than 1 foot will contain escape ramps (maximum slope of 2:1) to allow trapped individuals to escape uncovered holes or trenches. Holes and trenches will be inspected prior to filling. ▪ All food and food-related trash will be enclosed in sealed trash containers at the end of each workday and removed completely from the area of impact once every three days to avoid attracting wildlife. ▪ A speed limit of 15 mph will be maintained on dirt roads. ▪ All equipment will be maintained such that there are no leaks of automotive fluids such as fuels, oils, and solvents. Any fuel or oil leaks will be cleaned up immediately and disposed of properly. ▪ Plastic monofilament netting (erosion control matting) or similar material will not be used within the area of impact because California red-legged frogs may become entangled or trapped. Acceptable substitutes include coconut coir matting or tackified hydroseeding compounds. ▪ Hazardous materials (e.g., such as fuels, oils, solvents) will be stored in sealable containers in a designated location that is at least 100 feet from aquatic habitat. If it is not feasible to store hazardous materials 100 feet from wetlands and river and stream channels, then spill containment measures will be implemented to prevent the possibility of accidental discharges to wetlands and waters. ▸ Prior to commencement of ground-disturbing activities (including vegetation disturbance activities) that would result in permanent loss of habitat for California red-legged frog, the implementing agency will implement the following measures to compensate for loss of California red-legged frog habitat:			

Mitigation Measures	Implementation Requirement	Timing	Verification Action
▪ The implementing agency will provide suitable in-kind habitat that will be created, restored, and/or set aside in perpetuity at a ratio of 3:1. Alternatively, credits will be purchased at a USFWS-approved conservation bank. Compensation plans will be subject to review and approval by USFWS. ▪ In-kind habitat compensation will occur prior to the initiation of ground or vegetation disturbance activities. Aquatic habitat will be provided for damage or loss of aquatic habitat and upland habitat will be provided for damage or loss of upland habitat. Compensation will be accomplished through the following options: 1) acquire land, by itself, or possibly in conjunction with a conservation organization, State park, State Wildlife Area, National Wildlife Refuge, or local regional park that provides occupied habitat; 2) purchase the appropriate credit units at a USFWS-approved conservation bank; 3) restore habitat to support California red-legged frog; or 4) other method as determined by USFWS ▸ If the final rule regarding the interpretation of the definition of take (Federal Register Vol. 90 No. 73, USFWS 2025) is approved and published prior to implementation of projects under the 2025 Blueprint EIR, instead of being required to follow the mitigation measures listed above, the project proponent will comply with the legal requirements of ESA as amended by the final rule and will provide mitigation as directed by USFWS or NOAA Fisheries (which could include the above, if directed). California Tiger Salamander ▸ If habitat potentially suitable for California tiger salamander is determined to be present within or in the vicinity of the area of impact, the implementing agency will retain a USFWS-approved biologist to conduct a pre-construction survey for California tiger salamander within the area of impact, which will be conducted in accordance with the *Interim Guidance on Site Assessment and Field Surveys for Determining Presence or a Negative Finding of the California Tiger Salamander* (USFWS and CDFG 2003) protocol no more than one year prior to the commencement of project construction activities. Consultation with USFWS and CDFW should be conducted as soon as possible during the early planning stages of an individual project. ▸ If California tiger salamander is found during surveys: ▪ When feasible, a 50-foot no-disturbance buffer will be constructed around burrows that provide suitable upland habitat for California tiger salamander. Burrows considered suitable for California tiger salamander will be determined by the USFWS-approved qualified biologist. ▪ All suitable burrows directly affected by construction will be hand excavated under the supervision of a qualified wildlife biologist. If California tiger salamanders are found, the biologist will relocate individuals to the nearest burrow that is outside of the area of impact. ▪ The biologist will conduct environmental awareness training for all construction personnel on required avoidance procedures and protocols if a California tiger salamander enters an active construction zone. ▪ For work conducted during the California tiger salamander migration season (November 1 to May 31): • Flagging will be placed around the area of impact during ground-disturbing activities after hand excavation of burrows has been completed. Flagging will also be placed around all spoils and stockpiles. No project activities will occur in the flagged area. A qualified biologist will visit the site weekly to ensure that the flagging is properly placed. Flagging design will be subject to the approval of USFWS. If flagging is not used, a qualified biological monitor will be on-site during all ground disturbance activities.			

Mitigation Measures	Implementation Requirement	Timing	Verification Action
• A qualified biologist will survey the area of impact (including access roads) in mornings following measurable precipitation events. Construction may commence once the biologist has confirmed that no California tiger salamanders are in the work area. ▪ Each day that work is conducted, the following will apply: • Prior to beginning work each day, underneath equipment and stored pipes greater than 1.2 inches in diameter will be inspected for California tiger salamander. If any are found, they will be allowed to move out of the construction area. • Trenches and holes within the area of impact will be covered and inspected daily for stranded individuals. Trenches and holes deeper than 1 foot will contain escape ramps (maximum slope of 2:1) to allow trapped individuals to escape uncovered holes or trenches. Holes and trenches will be inspected prior to filling. • All food and food-related trash will be enclosed in sealed trash containers at the end of each workday and removed completely from the area of impact once every three days to avoid attracting wildlife. • A speed limit of 15 mph will be maintained on dirt roads. • All equipment will be maintained such that there are no leaks of automotive fluids such as fuels, oils, and solvents. Any fuel or oil leaks will be cleaned up immediately and disposed of properly. • Plastic monofilament netting (erosion control matting) or similar material will not be used within the area of impact because California tiger salamander may become entangled or trapped. Acceptable substitutes include coconut coir matting or tackified hydroseeding compounds. • Hazardous materials (e.g., fuels, oils, solvents) will be stored in sealable containers in a designated location that is at least 100 feet from aquatic habitat. If it is not feasible to store hazardous materials 100 feet from wetlands and river and stream channels, then spill containment measures will be implemented to prevent the possibility of accidental discharges to wetlands and waters. • Prior to commencement of ground-disturbing activities (including vegetation disturbance activities) that would result in permanent loss of habitat for California tiger salamander, the implementing agency will implement the following measures to compensate for loss of California tiger salamander habitat: • The implementing agency will provide suitable in-kind habitat that will be created, restored, and/or set aside in perpetuity at a ratio of 3:1. Alternatively, credits will be purchased at a USFWS-approved conservation bank. Compensation plans will be subject to review and approval by USFWS. • In-kind habitat compensation will occur prior to initiation of ground or vegetation disturbance activities. Aquatic habitat will be provided for damage or loss of aquatic habitat and upland habitat will be provided for damage or loss of upland habitat. Compensation will be accomplished through the following options: 1) acquire land, by itself, or possibly in conjunction with a conservation organization, State park, State Wildlife Area, National Wildlife Refuge, or local regional park that provides occupied habitat; 2) purchase the appropriate credit units at a USFWS-approved conservation bank; 3) restore habitat to support the Central California tiger salamander; or 4) other method as determined by USFWS.			

Mitigation Measures	Implementation Requirement	Timing	Verification Action
▸ If the final rule regarding the interpretation of the definition of take (Federal Register Vol. 90 No. 73, USFWS 2025) is approved and published prior to implementation of projects under the 2025 Blueprint EIR, instead of being required to follow the mitigation measures listed above, the project proponent will comply with the legal requirements of ESA as amended by the final rule and will provide mitigation as directed by USFWS or NOAA Fisheries (which could include the above, if directed). **Sierra Nevada Yellow-Legged Frog, Foothill Yellow-Legged Frog, Northern Leopard Frog, Southern Long-Toed Salamander, Western Spadefoot, and Yosemite Toad** ▸ If habitat potentially suitable for other special-status amphibians is determined to be present within or in the vicinity of the area of impact, the implementing agency will retain a qualified biologist familiar with the life cycle of special-status amphibians with potential to occur in the area of impact (e.g., Sierra Nevada yellow-legged frog, foothill yellow-legged frog, northern leopard frog, southern long-toed salamander, western spadefoot, Yosemite toad) to conduct a pre-construction survey prior to commencement of construction activities, including land clearing, within the area of impact and a 400-foot buffer around the area of impact. Surveys will consist of "walk and turn" surveys of areas beneath surface objects (e.g., rocks, leaf litter, moss mats, coarse woody debris) for salamanders and visual searches for frogs within upland and aquatic habitat. Surveys will be conducted within the appropriate season to maximize potential for observation for each species, and appropriate surveys will be conducted for the applicable life stages (i.e., eggs, larvae, adults). ▸ If no special-status amphibians are found, then no further mitigation will be required. ▸ If special-status amphibians are found during the protocol-level survey, then the implementing agency will consult with CDFW or USFWS, as appropriate. Mitigation measures will be approved by CDFW or USFWS and may include relocating individuals, placement of flagging for avoidance, and construction monitoring by a qualified biologist. No project activities will occur in the flagged area. The implementing agency will implement the agreed-upon mitigation measures to offset the loss of occupied habitat or individuals. ▸ A qualified biologist will be present during the grubbing and clearing activities in riparian and aquatic habitats in the area of impact. ▸ For projects that include water work, egg and tadpole surveys will be conducted. If Sierra Nevada yellow-legged frog, foothill yellow-legged frog, or Yosemite toad eggs or tadpoles are identified in the work area, or within 250 feet downstream of the work area, work will stop, USFWS and CDFW will be notified to determine appropriate measures to avoid take of the species before work resumes, and water quality will be monitored so that the activity does not directly or indirectly harm eggs or tadpoles. ▸ If western spadefoot, which is currently proposed for listing, is listed under ESA by the time of implementation, the project proponent will implement the above measures in consultation with and with approval from USFWS. ▸ For federally listed species, if the final rule regarding the interpretation of the definition of take (Federal Register Vol. 90 No. 73, USFWS 2025) is approved and published prior to implementation of projects under the 2025 Blueprint EIR, instead of being required to follow the mitigation measures listed above, the project proponent will comply with the legal requirements of ESA as amended by the final rule and will provide mitigation as directed by USFWS or NOAA Fisheries (which could include the above, if directed).			

Mitigation Measures	Implementation Requirement	Timing	Verification Action

Giant Garter Snake
▶ If habitat potentially suitable for giant garter snake is determined to be present within or in the vicinity of the area of impact, the implementing agency will retain a qualified biologist to conduct a field investigation to delineate giant garter snake aquatic habitat within the area of impact and adjacent areas within 300 feet of the area of impact. Giant garter snake aquatic habitat includes agricultural ditches. Consultation with USFWS and CDFW should be conducted as soon as possible during the early planning stages of an individual project.
▶ The qualified biologist will conduct environmental awareness training for all construction personnel working on the project site on required avoidance procedures and protocols to implement if a giant garter snake enters an active construction zone.
▶ All construction activities within giant garter snake aquatic and upland habitat in and around the site will be conducted between May 1 and September 15, the active period for giant garter snakes. This would reduce direct impacts on the species because the snakes would be active and respond to construction activities by moving out of the way.
▶ If construction activities occur in giant garter snake aquatic habitat, aquatic habitat will be dewatered and then remain dry and absent of aquatic prey (e.g., fish and tadpoles) for 15 days prior to initiation of construction activities. If complete dewatering is not possible, the implementing agency will consult with CDFW and USFWS to determine what additional measures may be necessary to minimize effects to giant garter snake. After aquatic habitat has been dewatered 15 days prior to construction activities, flagging will be placed a minimum of 300 feet into adjacent uplands to isolate both the aquatic and adjacent upland habitat and the area will be avoided (i.e., no project activities will occur in the flagged area). In addition, high-visibility flagging will be erected to identify the construction limits and to protect adjacent habitat from encroachment of personnel and equipment, which will include all other giant garter snake habitat not described above, and the flagged area will be avoided by all construction personnel. The flagging and work area will be inspected by the approved biologist to ensure that fencing is intact and no snakes have entered the work area before the start of each workday. The flagging will be maintained by the contractor until completion of the project.
▶ Each day that work is conducted, the following will apply:
  ▪ During construction, an approved biologist experienced with giant garter snake identification and behavior will be on-site daily when construction activities within aquatic habitat or within 300 feet of aquatic habitat are taking place. The biologist will inspect the project site daily for giant garter snakes prior to that day's start of construction activities.
  ▪ If a giant garter snake is observed, the biologist will notify CDFW and USFWS immediately. Construction activities will be suspended in a 100-foot radius of the garter snake until the snake leaves the site on its own. If necessary, the biologist will consult with CDFW and USFWS regarding appropriate procedures for relocation. If the individual is handled, a report will be submitted, including date(s), location(s), habitat description, and any corrective measures taken to protect giant garter snake within 1 business day to CDFW and USFWS. The biologist will report any take of listed species to USFWS immediately. Any worker who inadvertently injures or kills a giant garter snake or who finds one dead, injured, or entrapped must immediately report the incident to the approved biologist.
  ▪ All excavated steep-walled holes and trenches more than 6 inches deep will be covered with plywood (or similar material) or provided with one or more escape ramps constructed of earth fill or wooden planks at the end of each workday or 30 minutes prior to sunset, whichever occurs first. All steep-walled holes and trenches will be inspected by the approved biologist each morning to ensure that no wildlife has become entrapped. All construction pipes, culverts, similar structures, construction equipment, and construction debris left overnight within habitat suitable for giant garter snake will be inspected for giant garter snake by the approved biologist prior to being moved.			

Mitigation Measures	Implementation Requirement	Timing	Verification Action
▪ If erosion control is implemented within the area of impact, non-entangling erosion control material will be used to reduce the potential for entrapment. Tightly woven fiber netting (mesh size less than 0.25 inch) or similar material will be used to ensure snakes are not trapped (no monofilament). Coconut coir matting and fiber rolls containing burlap are examples of acceptable erosion control materials. ▸ The applicant will ensure that there is no-net-loss of giant garter snake habitat by compensating for loss of habitat at a ratio of 1:1, by purchasing credits from a USFWS-approved conservation bank. ▸ If the final rule regarding the interpretation of the definition of take (Federal Register Vol. 90 No. 73, USFWS 2025) is approved and published prior to implementation of projects under the 2025 Blueprint EIR, instead of being required to follow the mitigation measures listed above, the project proponent will comply with the legal requirements of ESA as amended by the final rule and will provide mitigation as directed by USFWS or NOAA Fisheries (which could include the above, if directed). Northwestern Pond Turtle ▸ If habitat potentially suitable for northwestern pond turtle is identified within or in the vicinity of the area of impact, the implementing agency will retain a qualified biologist familiar with the species to conduct a preconstruction survey in the area of impact 24 hours before initiation of ground-disturbing construction activities in habitat potentially suitable for the species. Surveys for northwestern pond turtle will be conducted throughout the area of impact and within approximately 1,500 feet of suitable aquatic habitat within or adjacent to the area of impact. ▸ If no northwestern pond turtles are found, then further mitigation will not be required. ▸ If northwestern pond turtles or their nest sites are found, the biologist will contact CDFW to determine whether relocation and/or avoidance buffers and nest enclosures are appropriate. If CDFW approves of moving the individual, the biologist will be allowed sufficient time to move the northwestern pond turtle from the work site before work activities begin. ▸ If northwestern pond turtle, which is currently proposed for listing, is listed under ESA by the time of implementation, the applicant will implement the above measures in consultation with and with approval from USFWS. Coast Horned Lizard ▸ If habitat potentially suitable for coast horned lizard is determined to be present within or in the vicinity of the area of impact, the implementing agency will retain a qualified biologist familiar with coast horned lizard. ▸ Within 14 days before the initiation of construction activities or off-site improvements, a qualified biologist familiar with the life history of coast horned lizard shall conduct a preconstruction survey of habitat suitable for this species on the project site, which shall include walking linear transects of the site. ▸ If coast horned lizards are not detected during the preconstruction survey, the qualified biologist shall submit a report summarizing the results of the survey to the applicant and El Dorado County, and further mitigation shall not be required. ▸ If coast horned lizards are detected, a qualified biologist with an appropriate CDFW Scientific Collecting Permit that allows handling of reptiles shall be present during initial ground disturbance activities and shall inspect the project site before initiation of project activities. If coast horned lizards are detected, the qualified biologist shall move individuals into nearby suitable habitat that will not be disturbed by project activities.			

Mitigation Measures	Implementation Requirement	Timing	Verification Action
California Spotted Owl ▸ If habitat potentially suitable for California spotted owl is determined to be present within the area of impact, the implementing agency will retain a qualified biologist to conduct protocol-level surveys for the species in suitable nesting habitat within 0.25 miles of the area of impact prior to initiation of construction activities. Surveys for California spotted owl will follow the *Protocol for Surveying for Spotted Owl in Proposed Management Activity Areas and Habitat Conservation Areas* (USFS 1993) or any protocol subsequently developed by USFWS should the species be listed. If applicable to location of project, US Forest Service biologists from either the Plumas National Forest, Tahoe National Forest, or El Dorado National Forest will be contacted to determine if they have any recent survey and occurrence data for California spotted owl that have not been made publicly available to determine presence within 0.25 miles of the project site. This can include other US Forest Service designated habitat for California spotted owl, such as protected activity centers or core areas. ▸ If California spotted owl is determined to not be present within 0.25 miles of the project site, then further mitigation will not be required. ▸ If nesting California spotted owl or other California spotted owl habitat designated by the US Forest Service are identified within the area of impact or within 0.25 miles of the area of impact, project activities will be delayed within 0.25 miles of the area of impact between March 1 and August 31 to avoid disturbances to or loss of the active nest site until the nest is no longer active. Project activities include vegetation removal, earth moving, and construction. This buffer may be reduced through consultation with CDFW or USFWS if this species is listed under ESA by the time of implementation. The following will also apply: ▪ The project applicant will not remove any trees between September 1 and February 28 that contain active nest sites for California spotted owl during the breeding season. Once a qualified biologist has deemed a nest site inactive for 2 consecutive years, the restriction to protect the nest tree will be lifted. ▪ If California spotted owl, which is currently proposed for listing, is listed under ESA by the time of implementation, the applicant will implement the above measures in consultation with and approval from USFWS. ▸ If avoiding work between March 1 and August 31 is not feasible, a no disturbance buffer of 0.25 mile will be established around active California spotted owl nests and any other US Forest Service California spotted owl designated habitat (e.g., protected activity center) and no construction activities will occur within this buffer until the chicks have fledged as determined by a qualified Registered Professional Forester or biologist. **American Goshawk** ▸ If habitat potentially suitable for American goshawk (previously northern goshawk) is determined to be present within the area of impact, the implementing agency will retain a qualified biologist to conduct protocol-level surveys for the species in suitable nesting habitat within 0.25 miles of the area of impact prior to initiation of construction activities. Surveys for American goshawk will follow the *Northern Goshawk Inventory and Monitoring Technical Guide* (Woodbridge and Hargis 2006), or another appropriate method determined by the appropriate regulatory agency. If applicable to location of project, US Forest Service biologists from either the Plumas National Forest, Tahoe National Forest, or El Dorado National Forest will be contacted to determine if they have any recent survey and occurrence data for American goshawk that have not been made publicly available to determine presence within 0.25 miles of the project site. This can include other US Forest Service designated habitat for American goshawk, such as protected activity centers. ▸ If no American goshawk nests are found, then further mitigation will not be required.			

Mitigation Measures	Implementation Requirement	Timing	Verification Action
▸ If nesting American goshawk or other American goshawk habitat designated by the US Forest Service are identified within the area of impact or within 0.25 miles of the area of impact, project activities will be delayed within 0.25 miles of the area of impact between March 15 and August 15 to avoid disturbances to or loss of an active nest site, until the nest is no longer active. Project activities include vegetation removal, earth moving, and construction. This buffer may be reduced through consultation with CDFW. ▸ If avoiding work between March 15 and August 15 is not feasible, a no disturbance buffer of 0.25 mile will be established around active American goshawk nests and any other US Forest Service American goshawk designated habitat (e.g., protected activity center) and no construction activities will occur within this buffer until the chicks have fledged as determined by a qualified Registered Professional Forester or biologist. Great Gray Owl ▸ If habitat potentially suitable for great gray owl is determined to be present within the area of impact, the implementing agency will retain a qualified biologist to conduct protocol-level surveys for the species in suitable nesting habitat within 0.25 miles of the area of impact prior to initiation of construction activities. Surveys for great gray owl will follow the *Survey Protocol for Great Gray Owl (*Strix nebulosa*) within the Northwest Forest Plan Area* (Huff and Goodwin 2016), or another appropriate method determined by the appropriate regulatory agency. ▸ If no great gray owl nests are found, then further mitigation will not be required. ▸ If great gray owl nests are identified in the area of impact or within 0.25 miles of the area of impact, project activities will be delayed within 0.25 miles of the area of impact between March 15 and July 15 to avoid disturbances to or loss of an active nest site, until the nest is no longer active. Project activities include vegetation removal, ground disturbance, and construction. This buffer may be reduced through consultation with CDFW. Swainson's Hawk ▸ If habitat potentially suitable for Swainson's hawk is identified within or in the vicinity of the area of impact, and if construction activities occur between February 1 and August 31, the implementing agency will retain a qualified biologist to conduct surveys for Swainson's hawk in accordance with the Swainson's Hawk Technical Advisory Committee 2000 guidelines (SHTAC 2000), or current guidance. Surveys will cover a minimum of a 0.5-mile radius around the construction area. ▸ If no Swainson's hawk nests are detected, then further mitigation will not be required. ▸ If nesting Swainson's hawks are detected, a no disturbance buffer of between 0.25-miles and 0.5-miles will be established around nest occurrences, depending on the level of existing human disturbance in the vicinity of the nest site. Buffers will be maintained until a qualified biologist has determined that the young have fledged. ▪ The buffer may be adjusted if, in consultation with CDFW, a qualified biologist determines that an alternative buffer will not result in take of Swainson's hawks adults, young, or eggs because of particular site features (e.g., topography, natural line-of-sight barriers), level of project disturbance, or other considerations. If the buffer is reduced, a qualified biologist will monitor the behavior of the Swainson's hawks during all project activities within 0.25 miles or 0.5 miles (depending on the level of existing human disturbance in the vicinity of the nest site) of the nesting Swainson's hawk. If the Swainson's hawks are disturbed or agitated (e.g., vocalizations, fluffing feathers to increase body size appearance) by the project activities, the biologist will have the authority to halt the activities and re-establish a buffer consistent with the bullet directly above until the agitated behavior ceases and normal behavior resumes.			

Mitigation Measures	Implementation Requirement	Timing	Verification Action
▸ If potential nesting trees are to be removed during construction activities, removal will take place outside of Swainson's hawk nesting season and the implementing agencies will develop a plan, in consultation with CDFW, to replace known nest trees at a ratio of 3:1. If replacement planting is implemented, monitoring will be conducted annually for 5 years to assess the mitigation's effectiveness. The plan will include a performance standard for the mitigation that results in a no net loss of nesting habitat. ▸ If foraging habitat (e.g., annual grassland, agricultural land) is removed as a result of the project, mitigation will occur at a 1:1 ratio, which may be achieved through the dedication of a conservation easement, purchasing appropriate mitigation bank credits, or another CDFW approved action. Burrowing Owl ▸ If proposed activities are implemented in habitat suitable for burrowing owls, a qualified biologist will conduct surveys for burrowing owls in areas of habitat suitable for the species on and within 1,640 feet (500 meters) of the project site. Inaccessible areas (e.g., adjacent private property) will not be surveyed directly, but the biologist may use binoculars or a spotting scope to survey these areas. A minimum of four surveys will be conducted to determine whether burrowing owls occupy the site. Surveys will be conducted according to Appendix D of the 2012 *Staff Report on Burrowing Owl Mitigation* prepared by the California Department of Fish and Game (now CDFW) (CDFG 2012), or any subsequent updated guidance. If feasible, at least one survey should be conducted between February 15 and April 15 and the remaining surveys should be conducted between April 15 and July 15, at least three weeks apart. Because burrowing owls may recolonize a site after only a few days, one of the surveys, or an additional survey, will be conducted no less than 14 days before initiating ground disturbance activities to verify that take of burrowing owl would not occur. ▸ If no burrowing owls are found, the qualified biologist will submit a report documenting the survey methods and results to the lead agency, and no further mitigation will be required. ▸ If a burrow occupied by a burrowing owl is found during the surveys, the project applicant will establish and maintain a buffer around the occupied burrow and any identified satellite burrows (i.e., non-nesting burrows that burrowing owls use to escape predators or move young into after hatching) to prevent take of the burrowing owls. ▪ During the non-breeding season (September 1 through January 31), the minimum buffer distance will be 164 feet (50 meters). During the breeding season (February 1 through August 31), the minimum buffer distance will be increased to 1,640 feet (500 meters). ▪ The buffer may be adjusted if, in consultation with CDFW, a qualified biologist determines that an alternative buffer will not result in take of burrowing owl adults, young, or eggs because of particular site features (e.g., topography, natural line-of-sight barriers), level of project disturbance, or other considerations. If the buffer is reduced, a qualified biologist will monitor the behavior of the burrowing owls during all project activities within 1,640 feet of the burrow. If the owls are disturbed or agitated (e.g., vocalizations, bill snaps, fluffing feathers to increase body size appearance, drooping wings and rotating them forward, crouching and weaving back and forth) by the project activities, the biologist will have the authority to halt the activities and re-establish a buffer consistent with the bullet directly above until the agitated behavior ceases and normal behavior resumes. ▪ The buffer will remain in place around the occupied burrow and associated satellite burrows until a qualified biologist has determined through noninvasive methods that the burrows are no longer occupied by burrowing owl. A previously occupied burrow will be considered unoccupied if surveys demonstrate that no owls have used the burrow for seven consecutive days.			

Mitigation Measures	Implementation Requirement	Timing	Verification Action
▪ Locations of burrowing owls detected during surveys will be reported to the CNDDB. ▸ If implementation of a buffer to prevent take of burrowing owl is not feasible, the project applicant will consult with CDFW. ▸ The project applicant will compensate for the loss of burrowing owl by establishing permanent protection and perpetual management on land that provides burrowing owl habitat. Habitat management lands for burrowing owl may be established by conservation easement or fee title or credits may be purchased from a CDFW-approved conservation or mitigation bank Other Special-Status Raptors ▸ If habitat potentially suitable for other nesting special-status raptors (e.g., ferruginous hawk [*Buteo regalis*], golden eagle, bald eagle, northern harrier) or common raptors protected under California Fish and Game Code (e.g., red-tailed hawk, red-shouldered hawk) is identified within the area of impact or within 0.5 miles of the area of impact for golden eagle, 0.25 miles of the area of impact for bald eagle and American peregrine falcon, and 500 feet of the area of impact for all other raptors, all tree removal activities and construction activities will occur during the nonbreeding season (September 1 through January 31), if feasible. ▸ If tree removal or other construction activities must occur between February 1 and August 31, the implementing agency will retain a qualified biologist to conduct a preconstruction survey for nesting raptors within 0.5 miles, 0.25 miles, or 500 feet, depending on the species (see bullet above) of the area of impact no more than 7 days prior to initiation of construction. ▸ If no nests are detected, then further mitigation will not be required. ▸ If nests are detected, impacts on nesting raptors, including direct impacts and indirect impacts (e.g., noise, presence of construction crews) will be avoided by establishing appropriate buffers around active nest sites identified during preconstruction nest surveys. Factors to be considered for determining buffer size will include the presence of natural buffers provided by vegetation or topography; nest height; locations of foraging territory; and baseline levels of noise and human activity. Buffer size may be adjusted if the qualified biologist, in consultation with CDFW, determines that such an adjustment will not be likely to adversely affect the nest. The buffer areas will be flagged for avoidance, and no activity will occur within the buffer areas until the qualified biologist has determined, in coordination with CDFW, that the young have fledged, the nest is no longer active, or reducing the buffer would not likely result in nest abandonment. Monitoring of the nest by a qualified biologist during and after construction activities will be required if the activity has potential to adversely affect the nest. ▸ If bald or golden eagle nests are found during preconstruction surveys, then the nest tree will not be removed. ▸ Disturbance, injury, or mortality of bald eagle, California condor, golden eagle, and white-tailed kite will be completely avoided. Western Yellow-Billed Cuckoo, Least Bell's Vireo, and Willow Flycatcher ▸ If habitat potentially suitable for western yellow-billed cuckoo, least Bell's vireo, or willow flycatcher is determined to be present within or in the vicinity of the area of impact, the implementing agency will retain a qualified biologist to conduct protocol-level surveys for these species following the guidance offered in *A Natural History Summary and Survey Protocol for the Western Distinct Population Segment of the Yellow-billed Cuckoo* (Halterman et al. 2016); *Least Bell's Vireo Survey Guidelines* (USFWS 2001); *A Survey Protocol for Willow Flycatcher in California* (Bombay et al. 2003) and/or current industry standards, and the implementing agencies will initiate consultation with USFWS and CDFW. ▸ If no nests or territories are detected, then further mitigation will not be required.			

Mitigation Measures	Implementation Requirement	Timing	Verification Action
▶ If nests are detected, the implementing agency will establish buffers around nests that are sufficient to ensure that breeding is not likely to be disrupted or adversely affected by construction. No-disturbance buffers around active nests will be a minimum of 250 feet, unless a qualified biologist determines that smaller buffers would be sufficient to avoid impacts on nesting birds in consultation with CDFW or USFWS. Factors to be considered for determining buffer size will include: the presence of natural buffers provided by vegetation or topography; nest height; locations of foraging territory; and baseline levels of noise and human activity. Buffers will be maintained until a qualified biologist has determined that young have fledged and are no longer reliant upon the nest or parental care for survival. Other Special-Status Birds ▶ If habitat potentially suitable for other special-status nesting birds (e.g., bank swallow [*Riparia riparia*], black swift [*Cypseloides niger*], grasshopper sparrow [*Ammodramus savannarum*], loggerhead shrike; see Appendix C-2 for full list) or other native nesting birds protected under section 3503 of the California Fish and Game Code is identified within the area of impact or within 100 feet of the area of impact, all tree removal activities and construction activities will occur during the nonbreeding season (September 1–January 31), if feasible. If tree removal or other construction activities must occur between February 1 and August 31, the implementing agency will retain a qualified biologist to conduct protocol-level nest surveys within 500 feet of the area of impact no more than 7 days prior to initiation of construction. ▶ If no nests are detected, then further mitigation will not be required. ▶ If nests are detected, direct impacts and indirect impacts (e.g., noise, presence of construction crews) will be avoided by establishing appropriate buffers around active nest sites. Factors to be considered for determining buffer size will include the presence of natural buffers provided by vegetation or topography; nest height; locations of foraging territory; and baseline levels of noise and human activity. Buffer size may be adjusted if the qualified biologist, in consultation with CDFW or USFWS, determines that such an adjustment would not be likely to adversely affect the nest. The buffer areas will be flagged, and no activity will occur within the buffer areas until the qualified biologist has determined, in coordination with CDFW or USFWS, that the young have fledged, the nest is no longer active, or reducing the buffer would not likely result in nest abandonment. Monitoring of the nest by a qualified biologist during and after construction activities will be required if the activity has potential to adversely affect the nest. ▶ Disturbance, injury, or mortality of California black rail, greater sandhill crane will be completely avoided. Special-Status Fish ▶ If aquatic habitat potentially suitable for special-status fish is identified within the area of impact, and construction activities could result in adverse effects on this habitat, impacts on these species will be avoided by implementing the following measures: ▪ All work within waters where there is potential for Delta smelt (*Hypomesus transpacificus*) to occur, as defined in the most recent USFWS guidance, will be confined to a seasonal work window of August 1 through November 30 when Delta smelt are least likely to be present. Because this species does not regulate its movement strictly within this time frame, modification to the work windows may be approved by USFWS prior to project implementation based on information from the various in-Delta monitoring programs.			

Mitigation Measures	Implementation Requirement	Timing	Verification Action
▪ In-water construction activities where there is potential for steelhead and/or Chinook salmon to occur will be limited to the low-flow period between June 1 and October 1 to minimize the potential of adverse effects on federally listed anadromous salmonids during their emigration period. ▪ In-channel construction activities that could affect habitat for listed anadromous salmonids will be limited to daylight hours during weekdays, leaving a nighttime and weekend period of passage for these fish species. ▪ Construction best management practices for off-channel staging and storage of equipment and vehicles will be implemented to minimize the risk of contamination of streams and rivers by spilled materials. Best management practices will also include minimization of erosion and stormwater runoff, as appropriate. ▪ If bank stabilization activities are necessary, then such stabilization will be constructed to minimize predator habitat, minimize erosion potential, and contain material suitable for supporting riparian vegetation. ▸ For federally listed species, if the final rule regarding the interpretation of the definition of take (Federal Register Vol. 90 No. 73, USFWS 2025) is approved and published prior to implementation of projects under the 2025 Blueprint EIR, instead of being required to follow the mitigation measures listed above, the project proponent will comply with the legal requirements of ESA as amended by the final rule and will provide mitigation as directed by USFWS or NOAA Fisheries (which could include the above, if directed). Crotch's Bumble Bee ▸ If habitat potentially suitable for Crotch's bumble bee is identified within the area of impact, and this habitat cannot be avoided, the applicant will retain a qualified biologist familiar with bumble bees of California, and with experience using survey methods for bumble bees, to conduct focused surveys of habitat potentially suitable for Crotch's bumble bee within the project site. *Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species* (CDFW 2023) will be used to guide surveys. ▸ If no Crotch's bumble bees are not detected during focused surveys, the survey results will be submitted to the appropriate County, and no further mitigation will be required. ▸ If Crotch's bumble bees are detected during focused surveys, the survey results will be submitted to the lead agency, and appropriate avoidance measures will be implemented in consultation with and with approval from CDFW. Avoidance measures may include the following, if feasible: ▪ Protective buffers will be implemented around active overwintering or breeding colonies until the colonies are no longer active. ▪ Construction activities will occur from October through February to avoid the bumble bee flight season. ▪ Construction activities, including ground disturbance, will be conducted using a phased approach, such that the entirety of the habitat is not removed at once; the objective of this measure is to provide refuge for bumble bees during project activities and temporary retention of suitable floral resources proximate to the active construction areas. Monarch ▸ If habitat potentially suitable for monarch is identified in the area of impact, and this habitat cannot be avoided, the following will apply:			

Mitigation Measures	Implementation Requirement	Timing	Verification Action
▪ If construction activities (e.g., ground disturbance, vegetation removal, staging) on the project site occur during the period when milkweed plants may host monarch eggs or caterpillars (approximately mid-March through late September, depending on elevation and other factors) a qualified biologist will survey the project site for milkweed plants. ▪ If milkweed plants are found, a qualified biologist will inspect the milkweed plants for the presence of monarch eggs or caterpillars no more than 14 days before plant removal. If monarch eggs or caterpillars are detected, the milkweed plants will be avoided until they are no longer being used by monarch caterpillars, as confirmed by a qualified biologist, if feasible. ▪ If no eggs or caterpillars are detected, no additional protection measures are necessary ▸ If monarch, which is currently proposed for listing, is listed under ESA, the applicant will implement the above measures in consultation with and with approval from USFWS. Special-Status Vernal Pool Invertebrates ▸ If habitat potentially suitable for vernal pool invertebrate species (i.e., Conservancy fairy shrimp, midvalley fairy shrimp [*Branchinecta mesovallensis*], vernal pool fairy shrimp, vernal pool tadpole shrimp, Ricksecker's water scavenger beetle [*Hydrochara rickseckeri*]) is identified within the area of impact, and this habitat cannot be avoided, the implementing agency will retain a qualified biologist to conduct vernal pool invertebrate surveys in the area of impact and within 250 feet from the edge of the area of impact to evaluate direct and indirect effects on vernal pools in accordance with the *Programmatic Formal Endangered Species Act Consultation on Issuance of 404 Permits for Projects with Relatively Small Effects on Listed Vernal Pool Crustaceans within the Jurisdiction of the Sacramento Field Office, California* (USFWS 1996). ▸ Habitat Preservation: The implementing agencies will compensate for indirect effects of the project on habitat for vernal pool invertebrates at a sufficient ratio for no net loss of habitat function or acreage, by purchasing vernal pool preservation credits from a USFWS-approved conservation bank, or from another USFWS-approved conservation bank. Compensation credits will be purchased prior to any ground-disturbing activities. ▸ Habitat Creation: The implementing agencies will compensate for the direct effects of the project on habitat for vernal pool invertebrates at a sufficient ratio for no net loss of habitat function or acreage, by purchasing vernal pool creation credits from a USFWS-approved conservation bank, or from another USFWS-approved conservation bank. ▸ For seasonal wetlands and drainages that will be retained in the area of impact (i.e., those not proposed to be filled), a minimum no-disturbance buffer of at least 50 feet from these features will be implemented in the project area. The buffer area will be flagged with high visibility construction flagging prior to commencement of ground-disturbing activities and will be maintained for the duration of construction activities. All flagged areas will be avoided. ▸ For federally listed species, if the final rule regarding the interpretation of the definition of take (Federal Register Vol. 90 No. 73, USFWS 2025) is approved and published prior to implementation of projects under the 2025 Blueprint EIR, instead of being required to follow the mitigation measures listed above, the project proponent will comply with the legal requirements of ESA as amended by the final rule and will provide mitigation as directed by USFWS or NOAA Fisheries (which could include the above, if directed).			

Mitigation Measures	Implementation Requirement	Timing	Verification Action
Valley Elderberry Longhorn Beetle ▸ If elderberry shrub habitat suitable for valley elderberry longhorn beetle is identified in the area of impact, the implementing agency will retain a qualified biologist to conduct surveys for valley elderberry longhorn beetle according to the protocol outlined in USFWS *Framework for Assessing Impacts to the Valley Elderberry Longhorn Beetle* (USFWS 2017). The biologist will determine if there is a riparian area or known valley elderberry longhorn beetle records within 2,526 feet (800 meters) of the project site, and whether the project site is continuous with a historical riparian corridor. ▸ If the project site does not contain riparian habitat, but does contain elderberry shrubs, then the elderberry shrubs will be inspected for valley elderberry longhorn beetle exit holes. If exit holes are not present the implementing agency will consult with USFWS and will consider additional information, including occurrences of valley elderberry longhorn beetle within 800 meters of the project site, and proximity of the project site to existing and historic riparian corridors. ▸ If riparian habitat is present within the project site and elderberry shrubs are present within 165 feet, then it is likely that the site is occupied by valley elderberry longhorn beetle. If the project site contains riparian habitat and elderberry shrubs are not present within 165 feet, the implementing agency will consult with USFWS, as presence of riparian habitat is indicative of historic valley elderberry longhorn beetle occupancy. ▸ Impacts on valley elderberry longhorn beetle will be avoided and minimized by following the Conservation Measures outlined in the USFWS 2017 Framework for cases where elderberry shrubs can be retained and protected within 165 feet of the project footprint. ▸ If elderberry shrubs are 165 feet or more from project activities, direct or indirect impacts are not expected. Shrubs will be protected during construction by establishing and maintaining high visibility flagging at least 165 feet from the drip line of each elderberry shrub. Flagged areas will be avoided. ▸ If elderberry shrubs can be retained within the project footprint, project activities may occur up to 20 feet from the dripline of elderberry shrubs if precautions are implemented to minimize the potential for indirect impacts. Specifically, these minimization measures include: ▪ All areas to be avoided during construction activities will be flagged as close to construction limits as possible. ▪ A minimum avoidance area of at least 20 feet from the dripline of each elderberry plant will be maintained to avoid direct impacts that could damage or kill the plant. ▪ A qualified biologist will provide training for all contractors, work crews, and any onsite personnel on the status of valley elderberry longhorn beetle, its host plant and habitat, the need to avoid damaging the elderberry shrubs, and the possible penalties for non-compliance. ▪ A qualified biologist will monitor the work area at project-appropriate intervals to assure that all avoidance and minimization measures are implemented. The amount and duration of monitoring will depend on the project specifics and will be discussed with a USFWS biologist. ▪ As much as feasible, all activities that could occur within 165 feet of an elderberry shrub will be conducted outside of the flight season of the valley elderberry longhorn beetle (March–July).			

Mitigation Measures	Implementation Requirement	Timing	Verification Action
▪ Trimming of elderberry shrubs will occur between November and February and will avoid removal of any branches or stems that are greater than or equal to 1 inch in diameter to avoid and minimize adverse effects to valley elderberry longhorn beetle. ▪ Project activities, such as truck traffic or other use of machinery, will not create excessive dust on the project site, such that the growth or vigor of elderberry shrubs is adversely affected. Enforcement of a speed limit and watering dirt roadways are potential methods to minimize excessive dust creation. ▪ Herbicides will not be used within the dripline of any elderberry shrub. Insecticides will not be used within 98 feet of any elderberry shrub. All chemicals will be applied using a backpack sprayer or similar direct application method. Mechanical weed removal within the dripline of any elderberry shrub will be limited to the season when adults are not active (August–February) and will avoid damaging the elderberry. ▪ Erosion control will be implemented, and the affected area will be re-vegetated with appropriate native plants. ▶ If elderberry shrubs cannot be avoided, consultation with USFWS will be required. Conservation and minimization measures are likely to include preparation of supporting documentation that describes methods for relocation of existing shrubs and maintaining existing shrubs and other vegetation in a conservation area. All elderberry shrubs with stems greater than 1 inch in diameter that cannot be avoided or have been adversely affected by indirect damage to stems of the entire shrub will be transplanted. ▶ Relocation of existing elderberry shrubs and planting of new elderberry seedlings and associated riparian species will be implemented according to the Framework (USFWS 2017). The Framework uses presence or absence of exit holes, and whether the affected elderberry shrubs are located in riparian habitat to determine the number of elderberry seedlings or cuttings and associated riparian vegetation that would need to be planted as compensatory mitigation for affected valley elderberry longhorn beetle habitat. Compensatory mitigation may include purchasing credits at a USFWS-approved conservation bank, providing on-site mitigation, or establishing and protecting habitat for valley elderberry longhorn beetle. ▶ If the final rule regarding the interpretation of the definition of take (Federal Register Vol. 90 No. 73, USFWS 2025) is approved and published prior to implementation of projects under the 2025 Blueprint EIR, instead of being required to follow the mitigation measures listed above, the project proponent will comply with the legal requirements of ESA as amended by the final rule and will provide mitigation as directed by USFWS or NOAA Fisheries (which could include the above, if directed). **Special-Status Bats** ▶ If habitat suitable for bat roosts or bat colonies is identified in the area of impact that may be adversely affected by construction activities, the implementing agency will retain a qualified biologist to conduct a preconstruction bat survey no more than 14 days prior to the start of construction. The survey may include investigation of habitat for special-status bats (e.g., rocky outcrops, trees, snags, bridges, mines, caves, human-made structures) for bat use (e.g., guano), and/or an evening emergence survey. If evidence of bat use is observed, the species and number of bats using the roost will be determined. Bat detectors may be used to supplement survey efforts. ▶ If no bat roosts are observed, further mitigation will not be required.			

Mitigation Measures	Implementation Requirement	Timing	Verification Action
▸ If surveys confirm bats daytime-roost will be affected by construction activities, a Bat Exclusion Plan will be developed by the implementing agency and submitted to CDFW for review and approval prior to its implementation. No bat exclusion will occur between March 1 and August 15 (depending on location) which coincides with the maternity season in California. ▸ If a winter roost, a maternity roost, or any roost of a special-status bat species (i.e., pallid bat, spotted bat, Townsend's big-eared bat, western mastiff bat, western red bat) is found, a mitigation program addressing mitigation for the specific occurrence will be submitted to CDFW by the implementing agency and qualified biologist for review and approval to determine whether measures are appropriate. The mitigation plan will establish a buffer area around the colony during hibernation or while females in maternity colonies are nursing young that is large enough to prevent disturbance to the colonies. American Badger ▸ If burrow habitat potentially suitable for American badger is identified within the area of impact, the implementing agency will retain a qualified biologist to conduct a preconstruction survey for American badger. The survey will be conducted no more than 30 days prior to initiation of construction and will include visual inspection (e.g., direct observation, monitoring, trail camera) of suitable burrows to determine whether they are occupied. ▸ If no occupied burrows are found, further mitigation will not be required. ▸ If occupied burrows are found, impacts on active badger dens will be avoided by flagging exclusion zones around all active badger dens, within which construction activities will be prohibited until denning activities are complete or the den is abandoned. The qualified biologist will monitor each den once per week to track the status of the den and to determine when it is no longer occupied. Special-Status Forest Carnivores ▸ If habitat potentially suitable for wolverine, fisher, or Sierra Nevada red fox is identified in the area of impact, the implementing agency will retain a qualified biologist to conduct a preconstruction survey prior to commencement of construction activities (e.g., tree removal, ground disturbance) for these species within the area of impact and a 0.25 miles buffer of the area of impact. ▸ If individuals or potential or occupied dens are not found, further mitigation will not be required. ▸ If wolverine, fisher, or Sierra Nevada red fox are identified, or if potential dens of these species are located, an appropriate method will be used by a qualified wildlife biologist to confirm whether the den is occupied. This may involve use of remote field cameras, track plates, or hair snares. Other devices such as fiber optic scope may be utilized to determine occupancy. If the potential den is not occupied, the entrance will be temporarily blocked so that no other animals occupy the area during the construction period but only after it has been fully inspected. The blockage will be removed once construction activities have been completed. ▸ If a den is found to be occupied by one of these species, a no-disturbance buffer will be placed around the occupied den location. The no-disturbance buffer will include the den tree (or other structure) plus a suitable buffer as determined by the biologist in coordination with USFWS or CDFW, as appropriate depending on species status. Construction activities in the no-disturbance buffer will be avoided until the den is no longer occupied as determined by a qualified wildlife biologist in coordination with USFWS and CDFW.			

Mitigation Measures	Implementation Requirement	Timing	Verification Action
▸ Disturbance, injury, or mortality of California wolverine will be avoided. Northern California Ringtail ▸ If habitat potentially suitable for northern California ringtail is identified within the area of impact the implementing agency will retain a qualified biologist to conduct preconstruction surveys to identify individual northern California ringtails and potential nests. ▸ If individuals or potential or occupied nests are not found, further mitigation will not be required. ▸ If northern California ringtail or potential nests are found, an appropriate method will be used by the qualified biologist to confirm whether a northern California ringtail is occupying the nest (e.g., remote field cameras, track plates, hair snares, fiber optic scope). ▸ If a nest is determined to be occupied by a northern California ringtail, a buffer will be established around the nest tree (or other nest structure) sufficient to protect the nest from construction disturbance as determined by the qualified biologist in coordination with CDFW. No construction activities will occur within the buffer until the nest is unoccupied as determined by a qualified wildlife biologist in coordination with CDFW. ▸ Disturbance, injury, or mortality of northern California ringtail will be avoided. Salt-Marsh Harvest Mouse ▸ If habitat potentially suitable for salt-marsh harvest mouse is identified within the area of impact or within 100 feet of the area of impact, all habitat for salt-marsh harvest mouse including pickleweed (*Arthrocnemum* spp.) will be avoided, if feasible. ▸ If avoidance is not feasible, pickleweed and other vegetation in habitat potentially suitable for the species will be removed by hand (i.e., with non-motorized equipment). While removal occurs, a USFWS-approved biologist will monitor in front of the vegetation removal, walking at a safe distance in front of vegetation removal equipment to ensure no salt marsh harvest mice are present. The following will also apply: ▪ Prior to initiation of work activities within suitable habitat, the USWFS-approved biologist will survey the work area for the presence of salt marsh harvest mice and their nests. ▪ Surveys will be repeated daily prior to the beginning project activities at the proposed project site; one or more USFWS-approved biologists will survey the proposed project site to ensure it is clear of salt marsh harvest mice. ▪ Project activities will be restricted to daylight hours 30 minutes after sunrise and 30 minutes before sunset. ▪ Project activities will avoid high tides and periods when the marsh plain is inundated. ▪ Additional measures for vegetation removal will apply and are as follows: • Vegetation removal will move in a direction toward salt marsh harvest mouse habitat and continue in a uniform direction. • Vegetation will be removed to bare ground or stubble no higher than 1 inch. Vegetation will be cut in at least two passes: with the first pass cutting vegetation at approximately half of its height above the ground (mid-canopy) and the next pass, or subsequent passes, cutting vegetation to ground-level or no higher than 1 inch.			

Mitigation Measures	Implementation Requirement	Timing	Verification Action
• Cut vegetation will not be piled in the area where vegetation removal is taking place (what will be the avoidance area). It will be removed from the avoidance area as it is being cut, so that no standing or cut vegetation remains in the avoidance area when flagging is installed. ▪ While work is occurring, flagging will be placed around the defined work area prior to the start of construction or other ground disturbing activities and immediately after vegetation removal. No project activities will occur in the flagged area. ▪ The USWFS-approved biologist will conduct daily surveys to ensure that the flagging is intact and that no mice have entered the project area. ▸ If the final rule regarding the interpretation of the definition of take (Federal Register Vol. 90 No. 73, USFWS 2025) is approved and published prior to implementation of projects under the 2025 Blueprint EIR, instead of being required to follow the mitigation measures listed above, the project proponent will comply with the legal requirements of ESA as amended by the final rule and will provide mitigation as directed by USFWS or NOAA Fisheries (which could include the above, if directed). Special-Status Rabbits and Sierra Nevada Mountain Beaver ▸ If habitat potentially suitable for Sierra Nevada snowshoe hare, western white-tailed jackrabbit, and Sierra Nevada mountain beaver is identified within the area of impact, the implementing agency will retain a qualified biologist to conduct preconstruction surveys for these species. Surveys will include visual surveys for individuals and potential nests (e.g., shallow forms, cavities, depressions beneath brush). ▸ If individuals or potential or occupied nests are not found, further mitigation will not be required. ▸ If occupied nests are observed, a buffer will be established including the nest plus a suitable buffer as determined by the qualified biologist in coordination with CDFW. No construction activities will occur within the buffer until the nest is unoccupied as determined by a qualified wildlife biologist in coordination with CDFW. Marysville California Kangaroo Rat ▸ If habitat potentially suitable for Marysville California kangaroo rat is identified within the area of impact or within 100 feet of the area of impact, the implementing agency will retain a qualified biologist to conduct preconstruction surveys within 60 days prior to ground disturbing construction activities. The survey will include burrow searches within 100 feet of the area of impact. ▸ If suitable burrows are not found, further mitigation will not be required. ▸ If suitable burrows for this species are identified, focused live trapping surveys may be conducted by a qualified biologist to determine whether the burrows are being used by Marysville California kangaroo rat. If live trapping is not conducted or if live-trapping survey results are inconclusive, a 50-foot buffer will be established around suitable burrows. No construction activities will occur within the buffer until the burrow is unoccupied as determined by a qualified wildlife biologist in coordination with CDFW.			

Mitigation Measures	Implementation Requirement	Timing	Verification Action
Mitigation Measure 3.4-4: Avoid, Minimize, and Mitigate Impacts on Riparian Habitat, Sensitive Natural Communities, and Other Sensitive Habitats If the qualified biologist, after implementation of Mitigation Measure 3.4-1, determines that riparian habitat, sensitive natural communities, or other sensitive habitats are present within the area of impact and could be adversely affected by construction activities, then the following measures will be implemented: ▶ To the extent practicable, and in consideration of other design requirements and constraints (e.g., meeting primary project objectives and needs, avoidance of other sensitive resources), the implementing agency will attempt to design the proposed projects in a way that minimizes the removal of native riparian habitat, sensitive natural communities, and other sensitive habitats, particularly trees that contribute to the overstory canopy of these communities. ▶ The implementing agency will compensate for permanent loss of riparian habitat at a sufficient ratio, which may be achieved through a combination of on-site restoration/creation, off-site restoration, preservation, or mitigation credits. If mitigation credits are not available, stream and riparian habitat compensation will include the establishment of riparian vegetation on currently unvegetated bank portions of streams affected by the project and enhancement of existing riparian habitat through removal of nonnative species, where appropriate, and planting additional native riparian plants to increase cover, continuity, and width of the existing riparian corridor along streams on the project site and surrounding areas. Construction activities and compensatory mitigation will l include development of a Compensatory Stream and Riparian Mitigation and Monitoring Plan for creating or restoring in-kind habitat in the surrounding area. The Compensatory Stream and Riparian Mitigation and Monitoring Plan will include the following: ▪ identification of compensatory mitigation sites and criteria for selecting these mitigation sites; ▪ in-kind reference habitats for comparison with compensatory riparian habitats (using performance and success criteria) to document success; ▪ monitoring protocol, including schedule and annual report requirements (compensatory habitat will be monitored for a minimum of 5 years from completion of mitigation, or human intervention [including recontouring and grading], or until the success criteria identified in the approved mitigation plan have been met, whichever is longer); ▪ ecological performance standards, based on the best available science and including specifications for native riparian plant densities, species composition, amount of dead woody vegetation gaps and bare ground, and survivorship; at a minimum, compensatory mitigation planting sites must achieve 80 percent survival of planted riparian trees and shrubs by the end of the 5-year maintenance and monitoring period or dead and dying trees will be replaced and monitoring continued until 80 percent survivorship is achieved; ▪ corrective measures if performance standards are not met; ▪ responsible parties for monitoring and preparing reports; and ▪ responsible parties for receiving and reviewing reports and for verifying success or prescribing implementation or corrective actions. ▶ If oak woodland habitat is removed, the implementing agency will determine if the loss of oak woodland would have a significant impact on the environment. If so, an oak woodland mitigation plan will be developed that to offset the loss of habitat acreage and function, which may be achieved through a combination of restoration/creation, preservation, or	This mitigation measure will be considered by the lead agency for applicability at the project level.	Prior to approval of future projects.	The lead agency shall provide evidence that all applicable elements of the measure or equally effective measures have been satisfied.

Mitigation Measures	Implementation Requirement	Timing	Verification Action
mitigation credits. At a minimum, the restoration and monitoring plan will include clear goals and objectives, success criteria, specifics on restoration/creation (e.g., plant palette, soils, irrigation), specific monitoring periods and reporting guidelines, and a maintenance plan. Oak woodland restoration or creation will be monitored for a minimum of 5 years and will be considered successful when at least 75 percent of all plantings have become successfully established. Such mitigation sites will be dedicated either in fee or as an easement in perpetuity held by a qualified agency. Guaranteed funding for maintenance of the mitigation sites will be established. ▸ If losses of sensitive natural communities or other habitats recognized as sensitive by CDFW (see Appendix C-3) would be substantial, then additional compensation will be provided through creating, restoring, or preserving in perpetuity in-kind communities to offset the loss of habitat function or acreage.			
Mitigation Measure 3.4-5: Avoid, Minimize, and Mitigate Impacts on Wetland and Other Waters If the qualified biologist, after implementation of Mitigation Measure 3.4-1, determines that wetlands or other waters are present in the area of impact and could be adversely affected by construction activities, then the following measures will be implemented: ▸ The implementing agency will conduct a delineation of state or federally protected wetlands and submit the delineation to appropriate agencies for verification. The delineation will be conducted according to methods established in the USACE Wetlands Delineation Manual (Environmental Laboratory 1987), the Arid West Supplement (Environmental Laboratory 2008), the Western Mountains and Valley Supplement (Environmental Laboratory 2010), and state wetland procedures (California Water Boards 2021 or current procedures). ▸ If state or federally protected wetlands are determined to be present within a project site that can be avoided, the qualified biologist will establish a buffer around wetlands and mark the buffer boundary with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway). The buffer will be a minimum width of 25 feet but may be larger if deemed necessary. The appropriate size and shape of the buffer zone will be determined in coordination with the qualified biologist and will depend on the type of wetland present (e.g., stream, vernal pool, pond), the timing of project activities (e.g., wet or dry time of year), whether any special-status species may occupy the wetland and the species' vulnerability to the project activities, environmental conditions and terrain, and the project activity being implemented. ▸ Project activities (e.g., ground disturbance, vegetation removal, staging) will be prohibited within the established buffer. The qualified biologist will periodically inspect the materials demarcating the buffer to confirm that they are intact and visible, and wetland impacts are being avoided. ▸ If any waters of the United States or waters of the state are lost or degraded by the project, these shall be replaced or restored on a no-net-loss basis in accordance with the applicable USACE and California Water Board mitigation standards in place at the time of construction.	This mitigation measure will be considered by the lead agency for applicability at the project level.	Prior to and during construction of future projects.	The lead agency shall provide evidence that all applicable elements of the measure or equally effective measures have been satisfied.

Mitigation Measures	Implementation Requirement	Timing	Verification Action
Mitigation Measure 3.4-6: Avoid, Minimize, and Mitigate Impacts on Wildlife Movement Corridors or Native Wildlife Nursery Sites If the qualified biologist, after implementation of Mitigation Measure 3.4-1, determines that wildlife movement corridors or native wildlife nursery sites are present within the area of impact and could be adversely affected by construction activities, then the following measures will be implemented: ▸ Implementing agencies will design projects such that they avoid and minimize direct and indirect impacts on wildlife movement corridors and/or native wildlife nursery sites. Design considerations may include but would not be limited to the following: ▪ constructing wildlife friendly overpasses, underpasses, bridges and/or culverts that are integrated with appropriate roadside fencing that prevents wildlife from going into the roadway and direct them towards crossing structures; ▪ using wildlife friendly fencing; ▪ limiting wildland conversions in identified wildlife corridors or native wildlife nursery sites; ▪ retaining wildlife friendly vegetation in and around developments; and ▪ avoiding the nursery or migration season for common wildlife that have important movement corridors or nursery sites in the project area during construction. ▸ For projects that cannot avoid significant impacts on wildlife movement corridors or native wildlife nursery areas, implementing agencies will consult with CDFW to determine appropriate measures to minimize direct and indirect impacts that could occur as a result of implementing the 2025 Blueprint and will implement measures to mitigate impacts on wildlife corridors or native wildlife nursery sites. ▸ For projects that require the placement of stream culverts in a fish spawning stream, the implementing agencies will consult with either USACE, NOAA Fisheries, USFWS, and CDFW, as applicable, to identify measures that will allow fish passage through the culverts. ▸ For projects in or adjacent to riparian corridors, project design will maximize distance of lighting from riparian corridors and direct light sources away from the riparian corridor. Night lighting of trails along riparian corridors should be avoided.	This mitigation measure will be considered by the lead agency for applicability at the project level.	During design of future projects.	The lead agency shall provide evidence that all applicable elements of the measure or equally effective measures have been satisfied.
Mitigation Measure 3.4-7: Avoid, Minimize, and Mitigate for Impacts on Protected Trees and Other Biological Resources Protected by Local Ordinances If the qualified biologist, after implementation of Mitigation Measure 3.4-1, determines that local ordinances or policies intended to protect biological resources will apply and that construction activities may result in conflicts with these ordinances or policies, then the following measures will be implemented: ▸ Implementing agencies will ensure project designs avoid and minimize direct and indirect impacts on protected trees and other locally protected biological resources where feasible, as defined in Section 15364 of the State CEQA Guidelines. ▸ At a minimum, qualifying protected trees (or other biological resources) will be replaced at ratios included in the local general plan, local policies, or city or county codes in locally approved mitigation sites. ▸ As part of project-level environmental review, implementing agencies will ensure that projects comply with the most recent general plans, policies, and ordinances, and conservation plans.	This mitigation measure will be considered by the lead agency for applicability at the project level.	During design of future projects.	The lead agency shall provide evidence that all applicable elements of the measure or equally effective measures have been satisfied.

Mitigation Measures	Implementation Requirement	Timing	Verification Action
Mitigation Measure 3.5-1: Conduct Project-Specific Historic Built Environment Resource Studies and Identify and Implement Project-Specific Mitigation Measures that shall be implemented to address site-specific impacts, include, but are not limited to, the following: ▶ As part of the project/environmental review of individual projects, a records search at the appropriate Information Center of the CHRIS and a review of literature and historic maps shall be conducted to determine whether the project area has been previously surveyed and whether historic built environment resources were identified. ▶ In the event the records indicate that no previous survey has been conducted within the last 5 years, a qualified architectural historian (36 CFR Section 61) shall conduct a study of the project area for the presence of historic built environment resources. The study shall include conducting a field survey, necessary background, archival and historic research, consultation with local historical societies, museums or other interested parties as relevant, and preparation of a historic resource assessment report. The report shall document the results of the survey and the historic context, evaluate the federal, state, or local significance of built environment resources greater than 45 years in age that may potentially be directly or indirectly impacted by project activities, recommend appropriate protection or mitigative treatment, if any, and include recordation of identified built environment resources on appropriate California Department of Parks and Recreation (DPR) series 523 forms. The final report and DPR forms shall be filed by the architectural historian with the CHRIS. Recommended treatment for historical built environment resources identified in the report shall be implemented. ▶ If no significant historic built environment resources are identified in the Historic Resource Assessment Report or prior survey of the project study area that may be directly or indirectly impacted by project activities, then mitigation for built environment resources is complete, and there is no adverse change to documented historical built environment resources for the project. ▶ If significant historic built environment resources are identified in the Historic Resource Assessment Report or prior survey of the project study area, the project sponsor and/or implementing agency should consider avoidance as the primary mitigation measure. If avoidance is possible, mitigation to documented historical built environment resources is complete. ▶ If avoidance of a significant built environment resource is not feasible, then the maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation, or reconstruction of the historical resource, as recommended by a qualified architectural historian or historic architect (36 CFR Section 61) and conducted in a manner consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitation, Restoring, and Reconstructing Historic Buildings or Historic Landscapes shall generally reduce impacts (Birnbaum and Peters 1996; Grimmer 2017). If adherence to the Secretary of the Interior's Standards cannot avoid materially altering in an adverse manner the physical characteristics or historic character of the surrounding environmental setting that contribute to a resource's historic significance, additional mitigation may be required. ▶ If avoidance or minimization of substantial adverse effects to a significant built environment resource is not feasible through project design or by adherence to the Secretary of the Interior's Standards, the project sponsor and/or implementing agency should ensure that Historic American Buildings Survey (HABS), Historic American Engineering Record (HAER), or Historic American Landscapes Survey (HALS) documentation is completed prior to demolishment or significant material alteration of the resource's physical characteristics or setting. The HABS, HAER, and HALS programs formally document historical resources through the use of large-format photography, measured drawings, written architectural descriptions,	This mitigation measure will be considered by the lead agency for applicability at the project level.	Prior to approval of future projects.	The lead agency shall provide evidence that all applicable elements of the measure or equally effective measures have been satisfied.

Mitigation Measures	Implementation Requirement	Timing	Verification Action
and historical narratives. The level of documentation required as mitigation and preparation of the HABS, HAER, or HALS shall be determined and prepared by a qualified architectural historian or historic architect (36 CFR Section 61). The documentation packages shall be archived in appropriate public and secure repositories. Such documentation would not reduce the impact to a less-than-significant level.			
Mitigation Measure 3.5-2: Conduct Project-Specific Archaeological Resource Studies and Identify and Implement Project-Specific Mitigation Measures that shall be implemented to address site-specific impacts, include, but are not limited to, the following: ▶ A records search at the appropriate Information Center of the CHRIS shall be conducted by a qualified archaeologist (36 CFR Section 61) as part of the appropriate project/environmental review of individual projects to determine whether the project area has been previously surveyed and whether archaeological resources were identified. ▶ In the event the records indicate that no previous survey has been conducted or the survey did not meet current professional standards or regulatory guidelines, the qualified archaeologist (36 CFR Section 61) or the Information Center shall make a recommendation on whether a survey is warranted based on the sensitivity of the project area for archaeological resources and current professional standards or regulatory guidelines. ▶ If a survey is considered warranted, the archaeological study of the project area by a qualified archaeologist shall include conducting a field survey, necessary background research, a Sacred Lands search by the NAHC and outreach to local Native Americans identified by the NAHC, consultation with local historical societies, museums or other interested parties as relevant, and an archaeological survey report. The confidential report shall document the results of the survey and the cultural context, assess the federal, state, or local significance of precontact or historic-era archaeological resources that may potentially be directly or indirectly impacted by project activities, provide appropriate management recommendations, and include recordation of identified archaeological resources on appropriate California DPR series 523 forms. Management recommendations may include additional studies to evaluate identified sites, treatment for documented historical resources, or archaeological monitoring during ground-disturbing construction activities at locations determined by the archaeologist to be sensitive for subsurface cultural resource deposits, including local Native American monitors if sensitive for precontact resources. The final confidential report and DPR forms would be filed by the archaeologist with the CHRIS. Recommended treatment for resources identified in the report should be implemented. ▶ If no archeological resources are identified in the Archeological Survey Report that may be directly or indirectly impacted by project activities, mitigation is complete as there would be no adverse change to documented archeological resources. ▶ When a project would impact a known archaeological site, the project sponsor and/or implementing agency shall determine whether the site is a historical resource or an archaeological nature (State CEQA Guidelines Section 15064.5(c)(1)) or unique archaeological resource (PRC Section 21083.2(g)). If archaeological sites identified in the project area are considered potentially significant, the project sponsor and/or responsible implementing agency shall undertake additional studies overseen by a qualified archaeologist (36 CFR Section 61) to evaluate the resources eligibility for listing in the CRHR, NRHP, local register, or as a unique archaeological resource and to recommend further mitigative treatment. Evaluations shall be based on, but not limited to, surface remains, subsurface testing, or archival and ethnographic resources, on the framework of the historic context and important research questions of the project area, and on the integrity of the resource. If a site to be tested is precontact, local tribal representatives should be afforded the opportunity to monitor the ground-disturbing activities. Appropriate mitigation may include curation of artifacts removed during subsurface testing.	This mitigation measure will be considered by the lead agency for applicability at the project level.	Prior to approval of future projects.	The lead agency shall provide evidence that all applicable elements of the measure or equally effective measures have been satisfied.

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

Mitigation Measures	Implementation Requirement	Timing	Verification Action
Mitigation Measure 3.5-3: Reduce Visibility or Accessibility of Archaeological Resources The project sponsor and/or implementing agency shall determine whether or not implementation of a project would indirectly impact historical or unique archaeological resources by increasing public visibility and ease of access. If so, the project sponsor and/or implementing agency shall take measures to reduce the visibility or accessibility of the archaeological resource to the public. Visibility of the resource can be reduced through the use of decorative walls or vegetation screening. Accessibility can be reduced by installing fencing or vegetation barriers, particularly noxious vegetation such as poison oak or blackberry bushes. It is important to avoid creating an attractive nuisance when protecting significant archaeological sites. Conspicuous walls or signs indicating that an area is restricted may result in more attempts to access the excluded area.	This mitigation measure will be considered by the lead agency for applicability at the project level.	Prior to approval of future projects.	The lead agency shall provide evidence that all applicable elements of the measure or equally effective measures have been satisfied.
Mitigation Measure 3.6-1: Site-Specific Paleontological Resources Inventory Assessment and Construction Monitoring by a Paleontologist Prior to initiating any construction in bedrock, a qualified professional paleontologist shall prepare a paleontological resources inventory and assessment for any affected rock units. This report shall include the following components: ▸ A report of any fossils observed during a reconnaissance-level field survey. ▸ The results of a records search of appropriate paleontological databases (at a minimum, the database at the University of California, Berkeley Museum of Paleontology) to determine whether any previously recorded fossil localities are located within or immediately adjacent to the area where rock boring is proposed. ▸ A determination as to whether the geologic formations are of high or low paleontological sensitivity, and a discussion supporting the reasons why the sensitivity determinations were made. If the rock formation is determined to be of high paleontological sensitivity, a paleontological monitor will be present during construction to monitor potential impacts on paleontological resources. If resources are identified during construction, work will stop within 100 feet of the resource until the resource can be evaluated and the recommendations of the paleontologist followed. Prior to issuance of grading permits that would allow for boring in bedrock, the approving local jurisdiction will review the report and findings to confirm no paleontological resources would be affected.	This mitigation measure will be considered by the lead agency for applicability at the project level.	Prior to and during construction of future projects.	The lead agency shall provide evidence that all applicable elements of the measure or equally effective measures have been satisfied.
Mitigation Measure 3.7-1: Coordinate with and Support Local Agencies within the Plan Area to Reduce Regional GHGs from All Sectors SACOG, in partnership with air districts within the plan area, shall work with the counties and cities within the plan area to adopt qualified GHG reduction plans (e.g., CAPs), develop GHG-reducing planning policies, and implement local climate initiatives, with the ultimate completion date to be achieved by the MTP/SCS's horizon year. EPA's Climate Pollution Reduction Grants (CPRG) program may be utilized to fund such plan developments as the program provides nearly $5 billion in grants to states, local governments, tribes, and territories to develop and implement plans for reducing GHG emissions. These reductions can be achieved through a combination of programs, including zero net energy in new construction, retrofits of existing buildings, incentivizing the development of renewable energy sources that serve both new and existing land uses, and other measures. Notably, the development and implementation of GHG reduction plans would ultimately occur at the discretion of local agencies, counties, and municipalities. Nevertheless, SACOG shall contribute relevant data and protocols to assist in the development of inventories, forecasts, and GHG reduction strategies.	SACOG must work with local agencies to assist with the development of GHG inventories, forecasts, and reduction strategies.	Throughout implementation of the 2025 Blueprint, with the ultimate completion date to be achieved by the MTP/SCS's horizon year.	SACOG will document outreach to municipalities that have not adopted qualified GHG reduction plans.

Mitigation Measures	Implementation Requirement	Timing	Verification Action
Mitigation Measure 3.7-2: Implement All Feasible On- and Off-Site Mitigation Measures to Reduce GHG Emissions Below a Lead Agency–Approved Threshold of Significance The applicable lead agency can and should implement, where necessary and feasible to address site-specific construction climate change impacts, the following measures to reduce construction GHG emissions below applicable air district thresholds, where they exist: ▶ Project proponents shall require its contractors to restrict the idling of on- and off-road diesel equipment to no more than 5 minutes while the equipment is on-site in compliance with California's Regulation for In-Use-Offroad Diesel Fueled Fleets. ▶ Project proponents of new facilities shall implement waste, disposal, and recycling strategies (i.e., 10 percent recycled content for Tier 1 and 15 percent recycled content for Tier 2) in accordance with the voluntary measures for non-residential land uses contained in Section A5.405.4 of the 2022 CALGreen Code or in accordance with any update to these requirements in future iterations of the CALGreen Code in place at the time of project construction. ▶ Project proponents of new facilities shall achieve or exceed the enhanced Tier 2 target for nonresidential land uses of recycling or reusing 80 percent of the construction waste as described in Section A5.408 of the 2022 CALGreen Code or in accordance with any update to these requirements in future iterations of the CALGreen Code in place at the time of project construction. ▶ Project proponents shall require that all diesel-powered, off-road construction equipment meet EPA's Tier 3 or Tier 4 emissions standards as defined in 40 CFR 1039 and comply with the exhaust emission test procedures and provisions of 40 CFR Parts 1065 and 1068. This measure can also be achieved by using battery-electric off-road equipment as it becomes available. ▶ Project proponents shall implement a program that incentivizes construction workers to carpool, and/or use public transit or electric vehicles to commute to and from the project site. ▶ Where project-level CEQA analysis determine that individual projects under the 2025 Blueprint would exceed thresholds following the implementation of feasible on-site mitigation, projects may participate in local offset programs, or through a California Air Resources Board (CARB)-accredited carbon offset protocol. ▶ For projects within PCAPCD's jurisdiction, project applicants should refer to and implement the construction emissions mitigation practices contained within the Placer County Sustainability Plan such as the use of renewable diesel, deployment of battery-electric construction equipment, and electrified jobsite power.	This mitigation measure will be considered by the lead agency for applicability at the project level.	Prior to approval of future projects.	The lead agency shall provide evidence that all applicable elements of the measure or equally effective measures have been satisfied.
Mitigation Measure 3.8-1: Conduct Site-Specific Investigation to Characterize the Potential Presence of Hazardous Waste The project proponent shall perform a records review to determine whether there is existing, permitted use of hazardous materials or documented evidence of hazardous waste contamination on the project site and provide the results of this investigation to the implementing agency. For any sites that are not listed and do not have the potential for residual hazardous materials as a result of historic land uses, no action is required unless unknown hazards are discovered during development. In that case, the implementing agency shall discontinue development until DTSC, RWQCB, local air district, and/or other responsible agency issues a determination. For any listed sites or sites that have the potential for residual hazardous materials as a result of historic land uses, project proponents shall prepare a Phase I ESA that meets ASTM standards. If a Phase 1 ESA prepared for a project contains recommendations, those shall be implemented for the project. If a Phase I ESA indicates the presence or likely presence of contamination, the project proponent shall prepare a Phase II ESA. Based on the Phase II ESA recommendations, the project shall implement and meet the standard remediation set forth in the Phase II ESA.	This mitigation measure will be considered by the lead agency for applicability at the project level.	Prior to approval of future projects.	The lead agency shall provide evidence that all applicable elements of the measure or equally effective measures have been satisfied.

Mitigation Measures	Implementation Requirement	Timing	Verification Action
Mitigation Measure 3.12-1: Employ Measures to Reduce Construction Noise To reduce construction noise levels and to achieve compliance with the applicable construction noise standards of the relevant jurisdiction within the plan area, implementing agencies shall implement measures, where applicable and necessary based on project- and site-specific considerations, that include those (or equally effective measures) identified below: ▶ Comply with local construction-related noise standards, including restricting construction activities to permitted hours as defined under local jurisdiction regulations, unless otherwise necessary. ▶ Notify residents and occupants within 252 feet of the project construction area at least 30 days in advance of anticipated times when construction noise levels are anticipated to exceed evening or nighttime noise limits established in the noise element of the general plan or noise ordinance. ▶ Designate an on-site construction compliance and enforcement manager for the project. ▶ Post procedures and phone numbers at the construction site for notifying the implementing agency staff and construction contractor (during regular construction hours and off-hours), along with permitted construction days and hours, complaint procedures, and who to notify in the event of a problem. ▶ All stationary construction equipment (e.g., generators, compressors, cement mixers) and staging areas shall be located as far as possible from nearby noise-sensitive land uses, and/or located to the extent feasible such that an existing or constructed noise attenuating feature (e.g., temporary noise wall or blanket) block the line-of-site between affected noise-sensitive land uses and construction staging areas. ▶ Prohibit the idling of construction equipment for extended periods of time in the vicinity of sensitive receptors. ▶ All construction equipment shall be properly maintained and equipped with noise-reduction intake and exhaust mufflers and engine shrouds, in accordance with manufacturer recommendations. Equipment engine shrouds shall be closed during equipment operation. ▶ For construction activity that would occur within a clear line-of-sight of an adjacent offsite sensitive receptor (as defined by the local jurisdiction), take place outside of hours during which construction activity is exempt from local noise standards, and exceed applicable construction noise standards or thresholds, the construction contractor shall install temporary sound barriers to attenuate noise, such as temporary noise curtains, sound walls, or similar products that provide a barrier to construction noise. The temporary sound barrier shall be located between the project construction noise sources and receptors to shield the receptors from construction noise. When installed properly, acoustic barriers can reduce construction noise levels by approximately 8-10 dB (EPA 1971). The installation of any temporary sound barrier shall meet all the following criteria: • be installed as close as feasible to the boundary of the construction site within the direct line of sight path of the nearby sensitive receptor(s); • consist of durable, flexible composite material featuring a noise barrier layer bound to sound-absorptive material on one side; and • consist of rugged, impervious material with a surface weight of at least one pound per square foot, such that a minimum of 10 dBA reduction is achieved on the receiving side of the sound barrier.	This mitigation measure will be considered by the lead agency for applicability at the project level.	During construction of future projects.	The lead agency shall provide evidence that all applicable elements of the measure or equally effective measures have been satisfied.

Mitigation Measures	Implementation Requirement	Timing	Verification Action
Mitigation Measure 3.12-2: Employ Measures to Reduce Traffic Noise For projects that have not undergone a previous noise study and that exceed applicable noise thresholds, the implementing agency shall require a project-level evaluation of noise impacts in accordance with applicable federal, State, and local noise standards. To reduce exposure from traffic noise when significant impacts are identified, implementing agencies and/or project sponsors shall implement measures, where feasible and necessary based on project- and site-specific considerations to achieve noise levels in accordance with applicable local noise standards. Measures shall include those identified below (or other equally effective measures): ▸ Design adjustments to proposed roadway or transit alignments to reduce noise levels in noise-sensitive areas (e.g., below-grade roadway alignments can effectively reduce noise levels in nearby areas by providing a barrier between the source and receptor). ▸ Use traffic-calming measures in the design of transportation improvements. ▸ Use rubberized asphalt or "quiet pavement" to reduce road noise for new roadway segments, roadways in which widening or other modifications require re-pavement, or normal reconstruction of roadways where re-pavement is planned. ▸ Maximize the distance between existing noise-sensitive land uses and new noise-generating facilities and transportation systems. ▸ Construct barriers in the form of outdoor barriers, sound walls, buildings, or earth berms to attenuate noise at adjacent sensitive uses if in compliance with local ordinances or policies. ▸ Monitor the effectiveness of noise reduction measures by taking noise measurements and installing adaptive mitigation measures to achieve the standards for ambient noise levels established by the noise element of the general plan or noise ordinance.	This mitigation measure will be considered by the lead agency for applicability at the project level.	Prior to approval of future projects.	The lead agency shall provide evidence that all applicable elements of the measure or equally effective measures have been satisfied.
Mitigation Measure 3.12-3: Employ Measures to Reduce Stationary Noise from New Land Use Projects To reduce the exposure of existing sensitive receptors to non-transportation noise associated with projected development, implementing agencies and/or project sponsors shall require, for projects with features that generate stationary noise that are near sensitive receptors, a project-level evaluation of noise impacts in accordance with applicable federal, state, and local noise standards. Where significant impacts are identified, applicable mitigation measures shall be implemented to reduce noise to achieve noise levels in accordance with applicable local noise standards. Where feasible and necessary to address site-specific impacts, measures shall be implemented and shall include, but are not limited to, the following: ▸ maximize the distance between noise-sensitive land uses and new noise-generating facilities; ▸ improve the acoustical insulation, window quality, and/or other soundproofing of dwelling units (existing or proposed) where setbacks do not sufficiently reduce noise; and ▸ incorporate noise-reduction features to reduce the average hourly exterior operational noise levels of mechanical equipment at nearby noise-sensitive land uses in compliance with local standards. Noise-reduction measures to be incorporated may include, but are not limited to, setbacks, the selection of alternative or lower noise-generating equipment, relocation of equipment, and use of equipment enclosures.	This mitigation measure will be considered by the lead agency for applicability at the project level.	Prior to approval of future projects.	The lead agency shall provide evidence that all applicable elements of the measure or equally effective measures have been satisfied.

Mitigation Measures	Implementation Requirement	Timing	Verification Action
Mitigation Measure 3.12-4: Reduce Exposure of New Sensitive Receptors to Transportation and Stationary Noise To prevent future noise sensitive receptors from exposure to excessive noise levels, prior to project approval, project proponents of a sensitive land use shall provide the local jurisdiction with a site-specific noise assessment prepared by a qualified acoustical professional that addresses interior and exterior noise levels at the proposed sensitive land use. The noise assessment shall consider existing noise sources adjacent to the proposed residential structure. If the proposed structure is located within an area with noise levels that exceed applicable noise thresholds for residential land uses, the noise assessment shall confirm, using approved calculation methodologies, that site design and building design are sufficient to comply with applicable interior noise standards. If the assessment shows that such standards would not be met with the design as proposed, the project proponent shall implement recommendations of the assessment that are shown to achieve applicable standards.	This mitigation measure will be considered by the lead agency for applicability at the project level.	Prior to approval of future projects.	The lead agency shall provide evidence that all applicable elements of the measure or equally effective measures have been satisfied.
Mitigation Measure 3.12-5: Employ Measures to Reduce Construction Vibration To reduce construction vibration levels to acceptable levels (i.e., 65 VdB to 80 VdB depending on frequency of event and 0.1 to 0.5 in/sec PPV depending on building type), implementing agencies and/or project sponsors shall implement measures, where feasible and necessary based on project- and site-specific considerations, that include those identified below: ▶ To minimize disturbance of sensitive receptors (as defined within a local ordinance or general plan) within 545 feet of impact pile-driving activities, implement "quiet" pile-driving technology (such as predrilling of piles and the use of more than one pile driver to shorten the total pile driving duration), where feasible, in consideration of geotechnical and structural requirements and conditions. ▶ To reduce structural damage, where pile driving is proposed within 48 feet of an existing historical structure, engage a qualified geotechnical engineer and qualified historic preservation professional (for designated historic buildings only) and/or structural engineer to conduct a preconstruction assessment of existing subsurface conditions and the structural integrity of nearby (i.e., within 48 feet) structures that would be exposed to pile-driving activity. If recommended by the preconstruction assessment, for structures or facilities within the impact distance (e.g., 48 feet) of pile-driving activities, the project sponsor shall require ground vibration monitoring of nearby reinforced-concrete, steel, or timber structures. Such methods and technologies shall be based on the specific conditions at the construction site. Conditions will be determined through activities such as the preconstruction surveying of potentially affected historic structures and underpinning of foundations of potentially affected structures, as necessary. The preconstruction assessment shall include a monitoring program to detect ground settlement or lateral movement of structures in the vicinity of pile-driving activities and identify corrective measures to be taken should monitored vibration levels indicate the potential for building damage. In the event of unacceptable ground movement with the potential to cause structural damage, all impact work shall cease, and corrective measures shall be implemented to minimize the risk to the subject, or adjacent, historic structure. ▶ Restrict construction activities to permitted hours in accordance with local jurisdiction regulations.	This mitigation measure will be considered by the lead agency for applicability at the project level.	During construction of future projects.	The lead agency shall provide evidence that all applicable elements of the measure or equally effective measures have been satisfied.

Mitigation Measures	Implementation Requirement	Timing	Verification Action
Mitigation Measure 3.12-6: Implement Measures to Reduce Operational Vibration from New and Expanded Rail Systems Project proponents proposing new or expanded rail systems shall undertake a detailed evaluation of vibration and groundborne noise impacts and identify project-specific mitigation measures as necessary to reduce vibration to a level that complies with applicable local standards or FTA standards. To address site-specific conditions to minimize the effects of vibration and groundborne noise from rail operations, the following measures shall be implemented where feasible and necessary: ▸ complying with all applicable local vibration and groundborne noise standards, or in the absence of such local standards, comply with FTA vibration and groundborne noise standards; ▸ maximizing the distance between tracks and sensitive uses; ▸ conducting wheel truing to re-contour wheels to provide a smooth-running surface and removing wheel flats; ▸ providing special track support systems such as floating slabs, resiliently supported ties, high resilience fasteners, and ballast mats; and ▸ implementing operational changes such as limiting train speed and reducing nighttime operations.	This mitigation measure will be considered by the lead agency for applicability at the project level.	Prior to approval of future projects and during operation.	The lead agency shall provide evidence that all applicable elements of the measure or equally effective measures have been satisfied.
Mitigation Measure 3.14-1: Require Provision of Adequate Public Services During project planning, design, and project-level environmental review, implementing agencies shall ensure that adequate public services are available. This shall be documented prior to project approval in the form of a capacity analysis approved by the various applicable districts.	This mitigation measure will be considered by the lead agency for applicability at the project level.	Prior to approval of future projects.	The lead agency shall prepare a capacity analysis approved by the various applicable districts.
Mitigation Measure 3.15-1: Require Provision of Adequate Park Facilities During project planning, design, and project-level environmental review, implementing agencies shall ensure that adequate park services are achieved. This shall be documented prior to project approval in the form of a capacity analysis approved by the applicable parks district.	This mitigation measure will be considered by the lead agency for applicability at the project level.	Prior to approval of future projects.	The lead agency shall prepare a capacity analysis approved by the various applicable districts.
Mitigation Measure 3.16-1: Implement VMT Reduction Strategies The State recognized that additional State policy actions and funding would be required to close the VMT gap between what the MPOs could achieve through implementation of their SCSs and reductions needed to meet State goals (CARB 2022c). Though the State must initiate these additional actions and funding programs, the exact form of the policies and funding programs must be collaboratively developed with input from MPOs, local agencies, and other organizations to ensure they provide the tools and incentives necessary to go beyond the SCSs in reducing VMT. SACOG shall be an active participant in this process to develop and explore pathways to implement State-level VMT reduction strategies, such as those outlined in Appendix C (2022 Scoping Plan) through a transparent and inclusive interagency policy development process to evaluate and identify implementation pathways for additional policies to reduce VMT and promote sustainable communities. SACOG developed the "Green Means Go" program as part of the 2020 MTP/SCS, which SACOG shall continue to implement this pilot for some of the infill incentives and support for transit and innovative mobility that are envisioned in the 2022 Scoping Plan as key elements of filling that VMT gap.	This mitigation measure will be considered by the lead agency for applicability at the project level.	Prior to approval of future projects and during operation.	The lead agency shall provide evidence that all applicable elements of the measure or equally effective measures have been satisfied.

Mitigation Measures	Implementation Requirement	Timing	Verification Action
In addition, implementing agencies shall comply with State guidance on VMT reduction, which may be achieved by implementation of the following: ▶ Implementing agencies shall require project modifications during the project design and environmental review stage of project development that would reduce VMT effects in a manner consistent with state guidance on VMT reduction. For roadway capacity expansion projects, this would include but is not limited to demand management through transportation systems management and operations (TSMO) including the use of pricing. Other project modifications may include, but are not limited to: ▪ improve or increase access to transit; ▪ increase access to common goods and services, such as groceries, schools, and daycare; ▪ incorporate affordable housing into the project; ▪ incorporate neighborhood electric vehicle network; ▪ orient the project toward transit, bicycle, and pedestrian facilities; ▪ improve pedestrian or bicycle networks, or transit service; ▪ provide traffic calming; ▪ provide bicycle parking; ▪ limit or eliminate parking supply; ▪ unbundle parking costs; ▪ provide parking cash-out programs; ▪ implement roadway pricing; ▪ implement or provide access to a commute reduction program; ▪ provide car-sharing, bike sharing, and ride-sharing programs; ▪ provide transit passes; ▪ shift single occupancy vehicle trips to carpooling or vanpooling, for example providing ride-matching services; ▪ provide telework options; ▪ provide incentives or subsidies that increase the use of modes other than single-occupancy vehicles; ▪ provide on-site amenities at places of work, such as priority parking for carpools and vanpools, secure bike parking, and showers and locker rooms; ▪ provide employee transportation coordinators at employment sites; ▪ provide a guaranteed ride home service to users of non-auto modes; ▪ locate the project in an area of the region that already exhibits low VMT; ▪ locate the project near transit; ▪ increase project density;			

Mitigation Measures	Implementation Requirement	Timing	Verification Action
▪ increase the mix of uses within the project or within the project's surroundings; ▪ increase connectivity and/or intersection density on the project site; and/or ▪ deploy management strategies (e.g., pricing, vehicle occupancy requirements) on roadways or roadway lanes. ▸ Implementing agencies shall require implementation of VMT reduction strategies through transportation demand management programs, impact fee programs, mitigation banks or exchange programs, in-lieu fee programs, or other land use project conditions that reduce VMT in a manner consistent with state guidance on VMT reduction. Programs should be designed to reduce VMT from existing land uses, where feasible, and from new discretionary residential or employment land use projects. Project conditions should be reserved for situations where programs are not feasible. The design of programs and project conditions should focus on VMT reduction strategies that increase travel choices and improve the comfort and convenience of sharing rides in private vehicles, using public transit, riding bicycles/scooters, or walking.			
Mitigation Measure 3.17-1: Prepare and Implement a Worker Awareness Training Program for Tribal Cultural Resources Prior to project-specific ground-disturbing activities, a tribal cultural resources awareness training program will be provided to all construction personnel active on the project site. A representative or representatives from culturally affiliated Native American Tribe(s) will be invited to participate in the development and delivery of the training program in coordination with a professional archaeologist meeting the United States Secretary of Interior's qualification standards for archaeology. The program will include relevant information regarding tribal cultural resources, including applicable laws and regulations, the consequences of violating said laws and regulations, protocols for resource avoidance, and protocols for discoveries, including who to contact in the event of a discovery and what to do upon the discovery of human remains. The program will also underscore the requirement for confidentiality and culturally appropriate treatment of any find of significance to Native Americans and protocols, consistent with Native American Tribal values.	This mitigation measure will be considered by the lead agency for applicability at the project level.	Prior to and during construction of future projects.	The lead agency shall provide evidence that all applicable elements of the measure or equally effective measures have been satisfied.

Mitigation Measures	Implementation Requirement	Timing	Verification Action
Mitigation Measure 3.17-2: Halt Ground Disturbance Upon Discovery of Subsurface Tribal Cultural Resources and Evaluate Discovered Resources During subsequent project-specific ground disturbing construction activities, if any suspected tribal cultural resources are discovered, all work shall cease within 100 feet of the find, and a tribal monitor from culturally affiliated Native American Tribe(s) shall be retained, if one is not currently on site. The tribal monitor shall determine if the find is a tribal cultural resource. The consulting THPO, or tribal monitor if the consulting tribe has no THPO, will make recommendations for further evaluation and culturally appropriate treatment of discovered Tribal cultural resources as necessary. Consultation with an archaeologist who meets the secretary of the Interior's professional qualifications for archaeology may also occur. Treatment and Documentation: The culturally affiliated Tribe shall consult with the Lead Agency to (1) identify the boundaries of the new tribal cultural resource and (2) if feasible, identify appropriate preservation in place and avoidance measures, including redesign or adjustments to the existing construction process, and long-term management, or 3) if avoidance is infeasible, a reburial location in proximity of the find where no future disturbance is anticipated. Permanent curation of tribal cultural resources will not take place unless approved in writing by the culturally affiliated Tribe. The construction contractor(s) shall provide secure, on-site storage for culturally sensitive soils or objects that are components of tribal cultural resources that are found or recovered during construction. Only Tribal Representatives shall have access to the storage. Storage size shall be determined by the nature of the TCR and can range from a small lock box to a conex box (shipping container). A secure (locked), fenced area can also provide adequate on-site storage if larger amounts of material must be stored. The construction contractor(s) and Lead Agency shall facilitate the respectful reburial of the culturally sensitive soils or objects. This includes providing a reburial location that is consistent with the Tribe's preferences, excavation of the reburial location, and assisting with the reburial, upon request. Any discoveries shall be documented on a Department of Parks and Recreation (DPR) 523 form within 4 weeks of the discovery and submitted to the appropriate CHRIS center in a timely manner. If articulated or disarticulated human remains, or human remains in any state of decomposition or skeletal completeness are discovered during construction activities, the County Coroner and the culturally affiliated Tribe shall be contacted immediately. Upon determination by the County Coroner that the find is Native American in origin, the Native American Heritage Commission will assign the Most Likely Descendent who will work with the project proponent to define appropriate treatment and disposition of the burials. Work at the discovery location cannot resume until all necessary investigation, evaluation, and treatment of the discovery under the requirements of the CEQA, specifically PRC Section 21084.3[b], have been satisfied.	This mitigation measure will be considered by the lead agency for applicability at the project level.	Prior to and during construction of future projects.	The lead agency shall provide evidence that all applicable elements of the measure or equally effective measures have been satisfied.

Mitigation Measures	Implementation Requirement	Timing	Verification Action
Implement Mitigation Measure 3.17-3: Identify and Protect Tribal Cultural Resources The culturally affiliated Tribe shall consult with the Lead Agency to determine whether or not implementation of a project would impact tribal cultural resources. During this consultation, the Lead Agency will engage the Tribe regarding the need for a Tribal survey to identify potential tribal cultural resources that meet the definition under PRC Section 21074. Also during this consultation, the Lead Agency and Tribe shall determine whether or not implementation of a project would indirectly impact tribal cultural resources by increasing public visibility and ease of access. If so, the project sponsor and/or implementing agency shall take measures to reduce the visibility or accessibility of the tribal cultural resource to the public. Visibility of the resource can be reduced through the use of decorative walls or vegetation screening. Accessibility can be reduced by installing fencing or vegetation barriers, particularly noxious vegetation such as poison oak or blackberry bushes. It is important to avoid creating an attractive nuisance when protecting significant sites. Conspicuous walls or signs indicating that an area is restricted may result in more attempts to access the excluded area. All measures shall be developed in coordination with the Tribe to ensure appropriate Tribal access.	This mitigation measure will be considered by the lead agency for applicability at the project level.	Prior to approval of future projects and during operation.	The lead agency shall provide evidence that all applicable elements of the measure or equally effective measures have been satisfied.
Mitigation Measure 3.18-1: Implement Water Conservation Measures The implementing agency shall implement measures regarding water conservation, efficiency, capture, and reuse identified by water suppliers in state, regional, and local plans, laws, and policies, and in their own plans and ordinances during planning, design, and project-level environment review, construction, operations, and maintenance activities. Measures include, but are not limited to, the following: ▶ Install drip or other water-conserving or weather-based irrigation systems for landscaping. ▶ Coordinate with the relevant water service provider to ensure that the provider has adequate water supplies to accommodate the increase in demand. If the water service provider servicing the project site is found to have inadequate water supplies, improvements and or mitigation measures shall be identified in each project's CEQA documentation. ▶ Design future projects to reduce the use of potable water for landscape irrigation (xeriscaping). These design components could include drought-tolerant plantings for landscaping, water-efficient irrigation systems, the capture and use of rainwater ▶ Design future projects to reduce the use of potable water through the use of water-conserving fixtures such as dual-flush toilets, waterless urinals, reduced flow faucets, and EnergyStar rated appliances. ▶ For projects located in an area with existing reclaimed water conveyance infrastructure and excess reclaimed water capacity, these future projects shall use reclaimed water for non-potable uses, such as landscape irrigation, ornamental water features, concrete mixing, and dust control. For projects in a location planned for future reclaimed water service, projects should install dual plumbing systems in anticipation of future use. ▶ Adopt Tier 1 or Tier 2 Cal Green standards as mandatory local requirements.	This mitigation measure will be considered by the lead agency for applicability at the project level.	Prior to and during planning, design, and project-level environment review, construction, operations, and maintenance of future projects.	The lead agency shall provide evidence that all applicable elements of the measure or equally effective measures have been satisfied.
Mitigation Measure 3.18-2: Require Provision of Adequate Utility Service During project planning and environmental review, implementing agencies shall ensure provision of adequate utilities including water, wastewater, stormwater drainage, and electricity service. This shall be documented prior to project approval in the form of a capacity analysis approved by the applicable parks district.	This mitigation measure will be considered by the lead agency for applicability at the project level.	During planning and environmental review of future projects.	The lead agency shall prepare a capacity analysis approved by the various applicable districts.

Mitigation Measures	Implementation Requirement	Timing	Verification Action
Mitigation Measure 3.19-1: Complete a Fire Safe Plan for Land Use Projects Located in Local Responsibility Area and State Responsibility Area Very High Fire Hazard Severity Zones Individual project applicants shall work with the municipal or regional fire marshal and the CAL FIRE Battalion Chief to produce and implement a fire safe plan (FSP) for land use projects that are located within a VHFHSZ of an LRA or an SRA. Depending on the specific environmental conditions of each project site, the FSP shall include a number of strategies, including but not limited to: ▪ Externally or internally illuminating street signs and address numbers on residential buildings for clearer visibility; ▪ Fencing materials adjacent to non-irrigated open space areas shall be constructed of non-combustible materials; ▪ Combustible sheds and other outbuildings shall be kept at least 30 feet from residential units and other buildings on each parcel; ▪ Alternative materials and construction methods exceeding the minimum criteria described in CBC Chapter 7A shall be implemented for individual land use projects located within SRA and LRA VHFHSZs to meet the "Practical Effect" principles described in CCR Title 14 – Section 1276.01 (when buildings are located within 30-feet of property lines) and reduce the potential for building-to-building fire spread. Specific requirements may include: ▪ Block any spaces between roof decking and the Class A roof covering to prevent embers from catching and igniting the building. ▪ Eaves shall be enclosed on the underside with non-combustible material, ignition-resistant material, or minimum 2-inch lumber. ▪ Exterior walls shall be constructed with non-combustible building materials such as stucco, fiber cement, stone or brick, and comply with CCR Title 24, Part 2, Chapter 7A, Section 707A. ▪ Use WUI ember and flame-resistant vents, conforming with the requirements described in ASTM E2886, to protect exterior wall openings when the wall is located within 30-feet of another building. Dryer vents shall be metal and equipped with a louver or flap. ▪ Exterior windows, skylights, glazed doors, and glazed openings within exterior doors shall be multi-paned with at least two tempered panes, minimum 20 minute fire rated, or fire-resistant glass block units, and shutters installed over windows shall be non-combustible. ▪ Areas located under first floor bay windows shall be enclosed with non-combustible walls. ▪ Exterior doors of buildings shall be non-combustible, or have a non-combustible exterior storm door, and comply with CCR Title 24, Part 2, Chapter 7A, Section 708A. ▪ A minimum non-combustible area of 6 vertical inches, measured from the ground up (at grade) and from any attached horizontal surface like a deck, shall be provided on the exterior of all buildings. Non-combustible materials can include brick, stone, fiber-cement siding, or concrete. ▪ Fencing materials located within 5 feet of a building shall be constructed of non-combustible materials. Areas located between 0 feet and 5 feet from all buildings shall remain non-combustible. Back-to-back, combustible fencing shall be separated by a minimum of 5 feet.	This mitigation measure will be considered by the lead agency for applicability at the project level.	Prior to approval of future projects.	The lead agency shall provide evidence that all applicable elements of the measure or equally effective measures have been satisfied.

Mitigation Measures	Implementation Requirement	Timing	Verification Action
▪ Landscape materials and other vegetation located within 0 to 100 feet of dwellings shall comply with the fire-resistant standards of CAL FIRE. ▪ Accessory and miscellaneous structures, as defined in the CBC, located within the reduced fire setback zone shall comply with this plan and CCR Title 24, Part 2, Chapter 7A, Section 710A. ▪ Decks, including posts, joists, railing, stairs, and walking surfaces, shall be non-combustible and comply with CCR Title 24, Part 2, Chapter 7A, Section 709A. ▪ Projections shall be non-combustible, ignition resistant, or 1 hour fire-rated in accordance with International WUI Code, Section 503.2, and/or National Fire Protection Association 1144 Standard for Reducing Structure Ignition Hazards, Section 5.2. ▪ Gutters and downspouts shall be non-combustible material. Gutters shall be provided with a non-combustible leaf guard. ▸ A Restrictive Covenant shall be filed with the final subdivision map which stipulates that a Fire Safe Plan has been prepared and wildfire mitigation measures shall be implemented. ▸ A 5-foot defensible space ember-resistant zone (Zone 0) shall be maintained around all buildings (including fencing within 5 feet). ▸ For residential units that include a Homeowners' Association (HOA), or other acceptable entity, the HOA or other acceptable entity shall be responsible for maintaining all private emergency vehicle access roads and wildfire fuel reduction zone provisions described in the FSP. Reliable on-going sources of funding shall be established and acceptable to the applicable fire department, fire district, or fire agency with jurisdiction prior to the recording of the final map for the project. Specifically, and also without limiting the foregoing, the owners shall be responsible for the operation and maintenance of, and for potential liability arising from: ▪ provisions for the necessary repair and maintenance of the roadway surface (as determined by the HOA and/or applicable fire department, fire district, or fire agency with jurisdiction); ▪ removal of vegetation overgrowing the roadway and infringing on the roadway clear vertical height of 15 feet or width of 20 feet; ▪ provisions for the maintenance, repair, and/or replacement of NO PARKING - FIRE LANE signage or striping; and ▪ provisions for the necessary repair and maintenance of vehicle and pedestrian access gates and opening systems. ▸ The FSP shall include a section on Fuel Reduction Management and Defensible Space Concepts to provide a fuel modification plan that consists of the following three defensible space zones for specific wildfire fuel reduction standards associated with buildings: ▪ Zone 0 – Ember-resistant Zone (0 to 5-feet from buildings); ▪ Zone 1 – Lean, Clean, and Green Zone (5 feet to 30 feet from buildings, or to the property line); ▪ Zone 2 – Reduce Fuel Zone (30 feet to 100 feet from buildings, or to the property line).			