

Appendix A

NOP and Responses



StanCOG
Stanislaus Council of Governments

Notice of Preparation for a Environmental Impact Report

2026 Regional Transportation Plan & Sustainable Communities Strategy

Notice is hereby given that the Stanislaus Council of Governments (StanCOG) will be the lead agency for the preparation of a Programmatic Environmental Impact Report (EIR) for StanCOG's 2026 Regional Transportation Plan (RTP) and Sustainable Communities Strategy (SCS), hereby referred to as the 2026 RTP/SCS or "project." The 2026 RTP/SCS is an update to the 2022 StanCOG RTP/SCS that was previously adopted, on August 17, 2022, by the StanCOG Policy Board and subsequently amended on September 18, 2024. Pursuant to Section 15082 of the California Environmental Quality Act (CEQA), StanCOG is soliciting comments from all interested persons, responsible and trustee agencies, and organizations concerned with the project as to the scope and content of the EIR and the environmental information to be analyzed in connection with the proposed project.

The project description, location, environmental review requirements, and probable environmental issues to be addressed in the EIR are attached. The RTP will guide the development of the Regional and Federal Transportation Improvement Programs (RTIP and FTIP) as well as other transportation programming documents and plans throughout the Stanislaus County region. Specifically, the project will update the region's goals and policies for meeting current and future mobility needs and identify programs, actions, and a revised plan of projects intended to address these needs consistent with adopted goals and policies. The 2026 RTP/SCS will address all transportation modes, including highways, streets and roads, transit, rail, bicycle and pedestrian, and aviation, as well as transportation demand management measures and intelligent transportation systems to the horizon year of 2049.

The 2026 RTP will include an update to the SCS, which is required by California Senate Bill 375, the Sustainable Communities and Climate Protection Act of 2008 (SB 375). As the MPO for Stanislaus County, StanCOG is required to prepare an SCS that demonstrates how GHG reduction targets will be met through integrated land use, housing, and transportation planning. If the SCS does not meet GHG emission reduction targets, an Alternative Planning Strategy (APS) may be prepared to show how the GHG emission targets would be achieved through means outside of the fiscally constrained RTP. In 2022, StanCOG identified a preferred growth scenario that met the goals of SB 375.

StanCOG will host a Programmatic EIR Scoping Meeting that can be attended in-person or virtually via Zoom. The purpose of the Scoping meeting is to solicit input on the scope and content of the environmental analysis that will be included in the Draft Programmatic EIR. The date, time, and location are as follows:

Scoping Meeting Date & Time

Wednesday, April 30, 2025

4:00 PM to 6:00 PM Pacific Time

Attend In-Person:

1111 I Street, Suite 308
Modesto, California 95354

Or

Attend Virtually Via Zoom:

Meeting ID: 873 6977 0730

Passcode: 659649

Link to Join Zoom Meeting:

<https://us06web.zoom.us/j/87369770730?pwd=4cBCUiHpkk78t3SFCPOTzPOjoa7Ruh.1>

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Direct comments to Elisabeth Hahn, Deputy Executive Director of Planning, at Stanislaus Council of Governments at ehahn@stancog.org no later than 30 days after receipt of this notice, or by May 15, 2025.

For more information, visit <http://www.valleyvision2049.com/> and <https://www.stancog.org/187/Regional-Transportation-Plan-RTP> or call 209-525-4600.

PROJECT DESCRIPTION AND SCOPE OF ENVIRONMENTAL ANALYSIS**Project Title**

The update is referred to as the 2026 Regional Transportation Plan and Sustainable Communities Strategy (2026 RTP/SCS). Preparation of a Programmatic EIR is part of the project.

Project Location

The geographical extent of the 2026 RTP/SCS includes the area within the limits of Stanislaus County, California, including the incorporated cities of Ceres, Hughson, Modesto, Newman, Oakdale, Patterson, Riverbank, Turlock, and Waterford, and all unincorporated areas under the jurisdiction of the County of Stanislaus. Capital improvement projects identified in the 2026 RTP/SCS are located on state highways, county roads and local streets, as well as on airport property, transit district property, and public utility lands.

Project Description

The proposed project is the StanCOG 2026 RTP/SCS. StanCOG's previous RTP/SCS was adopted in August 2022 and amended in September 2024. The 2026 RTP/SCS is the culmination of a multi-year effort that aims to improve access and mobility and facilitate the movement of people and goods efficiently. Furthermore, the SCS will seek to integrate land use, housing, and transportation planning to reduce emissions from cars and light trucks. StanCOG is required by federal law to develop an RTP/SCS that meets national ambient air quality standards and determines the needs of the transportation system and prioritizes proposed transportation projects. The RTP/SCS is also necessary to obtain and allocate federal funding for regional transportation projects.

StanCOG is in the process of updating the RTP/SCS, which will cover the planning period through the year 2049. The EIR for the 2026 RTP/SCS is intended to comply with CEQA. It will also require coordination with or reference to the Fixing America's Surface Transportation Act (Title 23 CFR Parts 450 and 500) (FAST Act), the Infrastructure Investment and Jobs Act (as applicable), the Federal Clean Air

Act, the California Clean Air Act, California SB 375, California SB 743, California Assembly Bill 32, and California SB 32. The EIR will consider the 2026 RTP's projects and preferred SCS scenario, a No Project alternative, and up to 2 alternative land use scenarios, and any alternatives to address identified significant impacts. The EIR will evaluate the potential impacts of implementing the policies and programs in the RTP/SCS in accordance with CEQA and will concentrate on the long-term environmental impacts of the RTP/SCS that extend to the 2049 planning horizon.

Issues to Be Addressed in the EIR

The impact categories listed below have been preliminarily identified for analysis in the 2026 RTP/SCS EIR.

- Aesthetics
- Agricultural and Forest Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Environmental Justice
- Geology/Soils
- Greenhouse Gas Emissions
- Hazards/Hazardous Materials
- Hydrology/Water Quality
- Land Use/Planning
- Mineral Resources
- Noise
- Population/Housing
- Public Services
- Recreation
- Transportation/Traffic
- Tribal Resources
- Utilities/Service Systems
- Wildfires

In addition, the EIR will address cumulative impacts, growth inducing impacts, and other issues required by CEQA.

Through the Notice of Preparation (NOP), StanCOG is seeking input on further categories of analysis or areas of focus within the specified categories above.

RTP Framework

The 2026 RTP/SCS's unified strategy would include the following key elements:

- A comprehensive description of the region's current and future challenges in accommodating growth and meeting mobility needs.
- A fiscally constrained transportation network that consists of US and State Highways, local streets and roadways, bicycle and pedestrian facilities, public transit, and airports.
- An integrated land use capacity analysis that accommodates the region's future employment and housing needs, and that protects sensitive habitat and resource areas.
- Intelligent Transportation System (ITS) and Transportation Demand Management (TDM) measures that improve system efficiency by influencing individual travel behavior. TDM measures typically offer programs and incentives to encourage alternatives to single-occupant vehicle travel. ITS measures typically involve the use of technology to maximize the efficiency of the transportation network.
- A financial plan that lays out the funding sources and requirements to implement the strategies of the RTP/SCS. The financial plan may also recommend additional innovative financing strategies that can be implemented to carry out additional needed projects and programs.
- A transportation system performance evaluation that lays out the ability of the proposed strategies to address challenges.

- Additional strategies and “planned projects” that may have little or no money programmed for funding.

The compendium of projects, policies, and programs which aim to meet the transportation needs of the region while reducing VMT and improving air quality comprise the 2026 RTP.

Sustainable Communities Strategy (SCS)

The 2026 RTP will include an update to the SCS, pursuant to the requirements of SB 375. Under SB 375, MPOs such as StanCOG are required to develop an SCS as part of the RTP to reduce, to the extent feasible, GHG emissions from cars and light trucks are required to meet a specified target for 2020 and 2035. In 2022, CARB updated its regional GHG target for StanCOG to a 12 percent reduction by 2020 and a 16 percent reduction by 2035, as compared to baseline per capita emissions levels in 2005. These targets remain unchanged and in effect for the 2026 RTP/SCS.

The GHG reductions are to be derived from fewer and/or shorter automobile and light truck trips resulting from integrated transportation, land use, housing, and environmental planning. Furthermore, SB 375 requires that the SCS shall identify general land uses, residential densities, and building intensities as well as areas to house future residents (see California Government Code Section 65080(b)(2)(B) for a more complete list of SB 375 requirements).

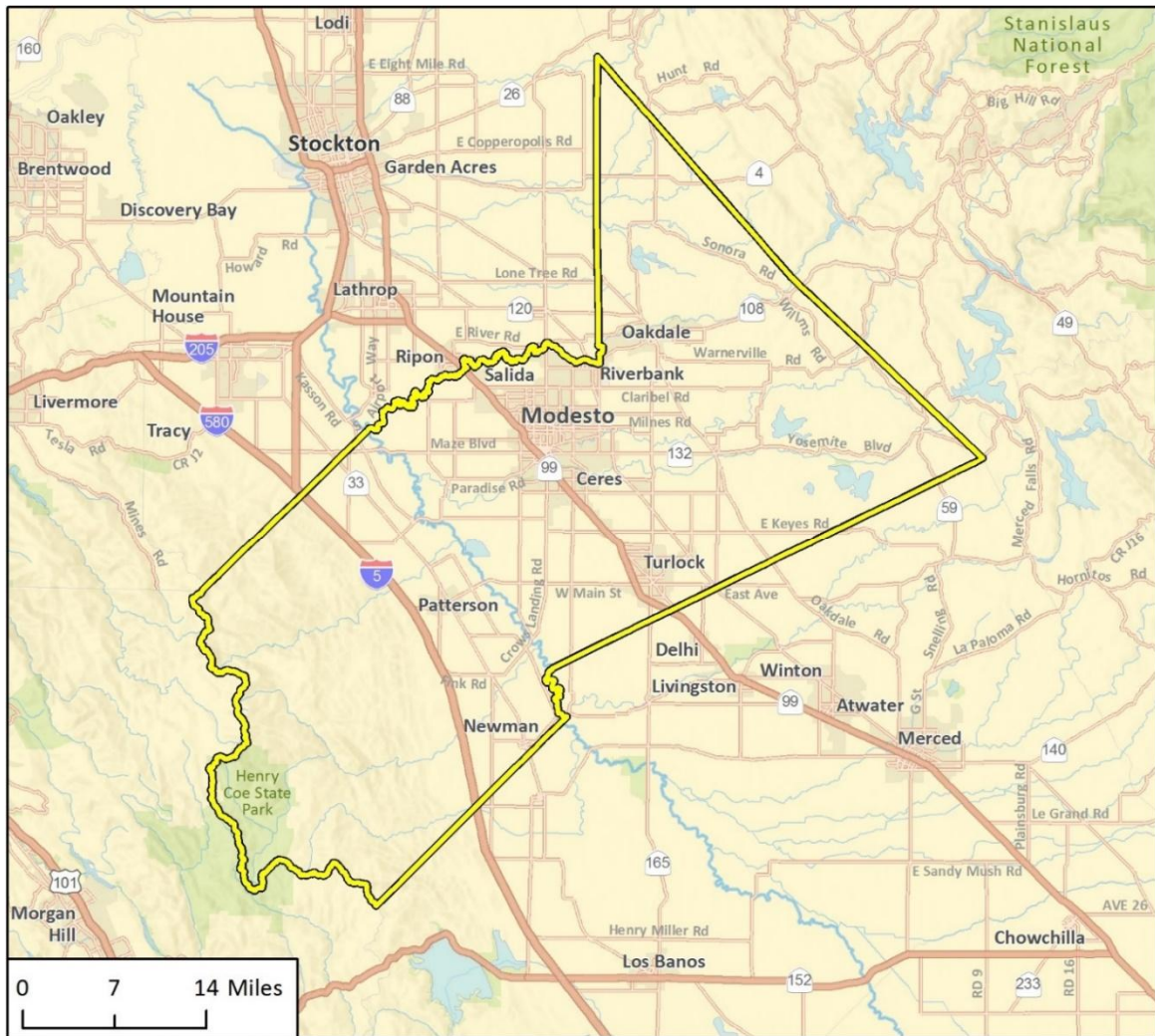
If the targets cannot be feasibly met through the 2026 RTP/SCS, an APS may be prepared to show how the targets would be achieved through alternative development patterns, infrastructure, or additional transportation measures or policies.

CEQA Streamlining

SB 375 contains CEQA incentives, or streamlining provisions at the project level, to encourage the implementation of coordinated land use and transportation planning within the RTP/SCS. Certain types of development projects (i.e., transit priority projects or residential/mixed use residential projects, as defined by the statute) may qualify for CEQA streamlining as long as the requisite criteria are met. Generally, meeting such criteria means the proposed project seeking to utilize the CEQA incentives is determined to be consistent with an approved SCS. Consistency will be determined by the local jurisdiction that is the lead agency for each project to be streamlined. StanCOG’s primary role is to include appropriate information in the SCS, such as land use information as required by SB 375 and/or guidance, to aid in interpreting land use information that will allow a jurisdiction to make a consistency determination with respect to appropriate streamlining options on a project-by-project basis.

The programs and projects to be included in the 2026 RTP/SCS will be programmatically addressed in the EIR. This will allow StanCOG to analyze the regional or general impacts of the program and projects. A more detailed or project level environmental assessment, if required, will be undertaken by the responsible lead implementing agency, either Caltrans, Stanislaus County, and/or the cities within the County, for the various projects included in the 2026 RTP/SCS, before the projects are approved for construction.

Project Location Map



 Stanislaus County

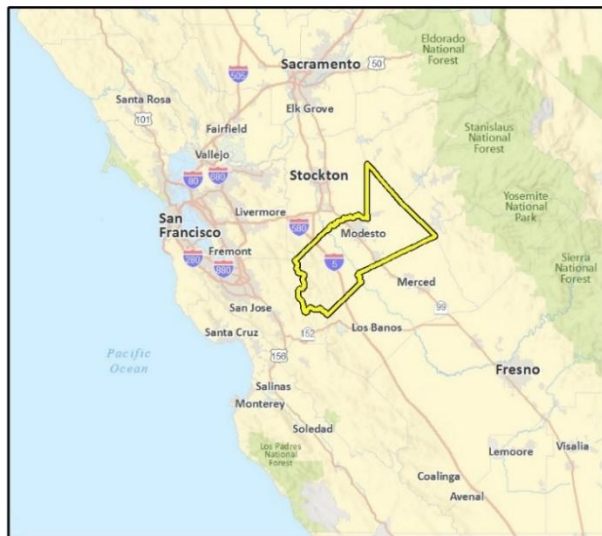


Fig. 1. Regional Location



NATIVE AMERICAN HERITAGE COMMISSION

April 17, 2025

Elisabeth Hahn
Stanislaus Council of Government (StanCOG)
1111 I Street
Suite 308
Modesto CA 95354

CHAIRPERSON
Reginald Pagaling
Chumash

VICE-CHAIRPERSON
Buffy McQuillen
Yokayo Pomo, Yuki,
Nomlaki

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Sara Dutschke
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Bennae Calac
Pauma-Yuima Band of
Luiseño Indians

COMMISSIONER
Vacant

ACTING EXECUTIVE
SECRETARY
Steven Quinn

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov

Re: 2025040852 2026 Regional Transportation Plan & Sustainable Communities Strategy Project, Stanislaus County

Dear Ms. Hahn:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, § 15064.5 (b) (CEQA Guidelines § 15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines § 15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:

Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

- a. A brief description of the project.
- b. The lead agency contact information.
- c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
- d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subs. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1 (b)).

- a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

- a. Alternatives to the project.
- b. Recommended mitigation measures.
- c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).

4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:

- a. Type of environmental review necessary.
- b. Significance of the tribal cultural resources.
- c. Significance of the project's impacts on tribal cultural resources.
- d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

- a. Whether the proposed project has a significant impact on an identified tribal cultural resource.

b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:

- a.** The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
- b.** A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).

8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).

9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).

10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:

- a.** Avoidance and preservation of the resources in place, including, but not limited to:
 - i.** Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii.** Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
- b.** Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i.** Protecting the cultural character and integrity of the resource.
 - ii.** Protecting the traditional use of the resource.
 - iii.** Protecting the confidentiality of the resource.
- c.** Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
- d.** Protecting the resource. (Pub. Resource Code §21084.3 (b)).
- e.** Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
- f.** Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).

11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:

- a.** The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
- b.** The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.

- c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. Tribal Consultation: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. No Statutory Time Limit on SB 18 Tribal Consultation. There is no statutory time limit on SB 18 tribal consultation.
3. Confidentiality: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. Conclusion of SB 18 Tribal Consultation: Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (https://ohp.parks.ca.gov/?page_id=30331) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.

- If you have any questions or need additional information, please contact me at my email address: Pricilla.Torres-Fuentes@NAHC.ca.gov.

Pricilla Torres-Fuentes

cc: State Clearinghouse



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Central Region
1234 East Shaw Avenue
Fresno, California 93710
(559) 243-4005
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



May 15, 2025

Elisabeth Hahn, Deputy Executive Director of Planning
Stanislaus Council of Governments
1111 I Street, Suite 308
Modesto, California 95354
(209) 484-9200
ehahn@stancog.org

**Subject: 2026 Regional Transportation Plan & Sustainable Communities Strategy
(Plan)
Notice of Preparation (NOP)
SCH No.: 2025040852**

Dear Elisabeth Hahn:

The California Department of Fish and Wildlife (CDFW) received a NOP from the Stanislaus Council of Governments (StanCOG) for the Plan pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Plan that may affect California fish and wildlife. Likewise, CDFW appreciates the opportunity to provide comments regarding those aspects of the Plan that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for

¹ CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

Elisabeth Hahn
Deputy Executive Director of Planning
May 15, 2025
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biologically sustainable populations of those species. (*Id.*, § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW is also submitting comments as a **Responsible Agency** under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381) CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, projects tiered from this Plan may be subject to CDFW's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of a project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the project proponent may seek related take authorization as provided by the Fish and Game Code.

Fully Protected Species: CDFW has jurisdiction over fully protected species of birds, mammals, amphibians and reptiles, and fish, pursuant to Fish and Game Code sections 3511, 4700, 5050, and 5515. Fully protected species may not be taken or possessed at any time and no licenses or permits may be issued for their take except as follows

Take is for necessary scientific research,

Efforts to recover a fully protected, endangered, or threatened species, live capture, and relocation of a bird species for the protection of livestock, or

They are a covered species whose conservation and management is provided for in a Natural Community Conservation Plan (Fish & G. Code, §§ 3511, 4700, 5050, & 5515).

Additionally, specified types of infrastructure projects may be eligible for an Incidental Take Permit (ITP) for unavoidable impacts to fully protected species if certain conditions are met (see Fish & G. Code §2081.15). Project proponents should consult with CDFW early in the project planning process if an ITP may be pursued for a project tiered from this Plan.

Unlisted Species: Species of plants and animals need not be officially listed as Endangered, Rare, or Threatened (E, R, or T) on any State or federal list to be considered E, R, or T under CEQA. If a species can be shown to meet the criteria for E, R, or T, as specified in the CEQA Guidelines section 15380, CDFW recommends it be fully considered in the environmental analysis for the Plan.

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Deputy Executive Director of Planning
May 15, 2025
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Nesting Birds: CDFW has jurisdiction over actions with potential to result in the disturbance or destruction of active nest sites or the unauthorized take of birds. Fish and Game Code sections that protect birds, their eggs and nests include sections 3503 (regarding unlawful take, possession, or needless destruction of the nest or eggs of any bird), 3503.5 (regarding the take, possession, or destruction of any birds-of-prey or their nests or eggs), and 3513 (regarding unlawful take of any migratory nongame bird).

PLAN DESCRIPTION SUMMARY

Proponent: Stanislaus Council of Governments (StanCOG)

Objective: The proposed Plan updates the 2022 Regional Transportation Plan & Sustainable Communities Strategy (RTP/SCS) to determine the needs of the transportation system within Stanislaus County through the planning period and to prioritize transportation projects.

Location: The Plan area incorporates the limits of Stanislaus County, including the incorporated cities of Ceres, Hughson, Modesto, Newman, Oakdale, Patterson, Riverbank, Turlock, and Waterford, and all unincorporated areas within the county. Capital improvement projects identified in the Project area are located on State highways, county roads and local streets, as well as on airport property, transit district property, and public utility lands.

Timeframe: StanCOG is in the process of updating the Plan, which will cover the planning period through the year 2049.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist StanCOG in adequately identifying and/or mitigating the Plan's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Editorial comments or other suggestions may also be included to improve the EIR prepared for the Plan.

Special-Status Species

Based on aerial imagery and species occurrence records from the California Natural Diversity Database (CNDDDB) (CDFW 2025) as well as CDFW's familiarity with biological resources in the Plan area, the proposed Plan area is known to and/or has the potential to support special-status species, and these resources need to be evaluated and addressed as part of the DEIR and prior to any approvals that would allow ground-disturbing activities. CDFW recommends that the species identified in Attachment 1 of this letter be considered as part of the DEIR that will be drafted for this Plan.

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CDFW also recommends that the DEIR include biological resource mitigation measures that would be implemented for all future projects tiered (or streamlined) from the EIR, and that mitigation measures for focused biological resource surveys incorporate the following species-specific survey methodology as appropriate:

- **Least Bell's vireo:** Least Bell's Vireo Survey Guidelines (U.S. Department of Interior 2001)
- **Foothills yellow-legged frog – Central Coast Distinct Population Segment:** A Standardized Protocol for Surveying Aquatic Amphibians (Fellers and Freel 1995) *please note that dip-netting would constitute take as defined by Fish and Game Code § 86, so it is recommended this survey technique be avoided
- **San Joaquin kit fox:** Standardized Recommendations for Protection of the San Joaquin kit Fox Prior to or During Ground Disturbance (USFWS 2011)
- **Swainson's hawk:** Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California Central Valley (SWHA TAC 2000)
- **California tiger salamander – Central Coast Distinct Population Segment:** Interim Guidance on Site Assessment and Field Surveys for Determining Presence or a Negative Finding of the California Tiger Salamander (USFWS 2003)
- **Bald eagle:** Protocol for Evaluating Bald Eagle Habitat and Populations in California (Jackman and Jenkins 2004)
- **Golden eagle:** Interim Golden Eagle Inventory and Monitoring Protocols; and Other Recommendations (Pagel et al. 2010)
- **Western burrowing owl:** Staff Report on Burrowing Owl Mitigation (CDFG 2012)
- **Crotch's and western bumble bees:** Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species (CDFW 2023)
- **California red-legged frog:** Revised Guidance on Site Assessment and Field Surveys for the California Red-legged Frog (USFWS 2005)
- **Special-Status plants:** Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities (CDFW 2018)

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California Endangered Species Act: Reasonably foreseeable future projects tiered from this Plan may be subject to CDFW's regulatory authority pursuant to the California Endangered Species Act (CESA). In the event that species listed under CESA are detected during surveys, consultation with CDFW is warranted to discuss how to implement the project and avoid "take," or if avoidance is not feasible, to acquire a State ITP, pursuant to Fish and Game Code section 2081 subdivision (b), prior to any ground disturbing activities. In addition, CDFW recommends that mitigation measures for the CESA listed species be fully addressed in the CEQA document prepared for any future project tiered from this Plan.

California Natural Diversity Database (CNDDDB): Please note that the CNDDDB is populated by voluntary submissions of species detections. As a result, species may be present in locations not depicted in the CNDDDB but where there is suitable habitat and features capable of supporting species. A lack of an occurrence record, or lack of recent occurrence records, in the CNDDDB does not mean that a species is not present. All projects tiered from this Plan should adequately assess any potential project-related impacts to biological resources by ensuring biological surveys are conducted by a qualified wildlife biologist during the appropriate survey period(s) and using the appropriate protocol survey methodology as warranted in order to determine whether or not any special-status species are present at or near the project area.

CEQA Alternatives Analysis: CDFW recommends that the information and results obtained from the cumulative impacts analysis conducted as part of this Plan's DEIR be used to develop and modify the Plan's alternatives to avoid and minimize impacts to biological resources to the maximum extent possible. Please note that when efforts to avoid and minimize impacts have been exhausted for projects tiered from this Plan, remaining impacts to sensitive biological resources may need to be mitigated to reduce impacts to a less than significant level, if feasible.

Cumulative Impact Analysis: Given that a Plan serves primarily as a planning tool and that future project-level CEQA documents are expected to be tiered from it, CDFW recommends that a cumulative impact analysis be conducted for all potential biological resources that will either be significantly or potentially significantly impacted by implementation of the Plan, including those whose impacts are determined to be less than significant with mitigation incorporated or for those resources that are rare or in poor or declining health and will be impacted by any future project, even if those impacts are expected to be relatively small (i.e. less than significant). CDFW recommends cumulative impacts be analyzed using an acceptable methodology to evaluate the impacts of past, present, and reasonably foreseeable future projects on resources and be focused specifically on the resource, not the project. An appropriate resource study area identified and utilized for this analysis is advised. CDFW staff is available for consultation in support of cumulative impacts analyses as a trustee and responsible agency under CEQA.

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Federally Listed Species: CDFW recommends projects tiered from this Plan consult with the U.S. Fish and Wildlife Service (USFWS) on potential impacts to federally listed species. Take under the Federal Endangered Species Act (ESA) is more broadly defined than CESA; take under the ESA also includes significant habitat modification or degradation that could result in death or injury to a listed species by interfering with essential behavioral patterns such as breeding, foraging, or nesting. Consultation with USFWS is advised well in advance of any ground disturbing activities.

Lake and Streambed Alteration: Reasonably foreseeable future projects tiered from this Plan may be subject to CDFW's regulatory authority pursuant to Fish and Game Code section 1600 et seq. Fish and Game Code section 1602 requires project proponents to notify CDFW prior to commencing any activity that may (a) substantially divert or obstruct the natural flow of any river, stream, or lake; (b) substantially change or use any material from the bed, bank, or channel of any river, stream, or lake; or (c) deposit debris, waste or other materials that could pass into any river, stream, or lake. "Any river, stream, or lake" includes those that are ephemeral or intermittent as well as those that are perennial in nature. For additional information on notification requirements, please contact our staff in the Lake and Stream Alteration Program at (559) 243-4593, or R4LSA@wildlife.ca.gov.

CDFW therefore recommends that the DEIR for this Plan include information related to these requirements of Fish and Game code and advise that projects tiered from this Plan retain a qualified biologist to determine if potential impacts to streams may require the need to notify pursuant to Fish and Game Code section 1602.

Nesting birds: CDFW encourages that all projects tiered from this Plan occur during the bird non-nesting season; however, if ground-disturbing or vegetation-disturbing activities must occur during the nesting season (February 1st through September 15th), each future project applicant is responsible for ensuring that implementation of their project does not result in violation of the Migratory Bird Treaty Act or relevant Fish and Game Code sections as referenced above.

CDFW recommends that a qualified biologist conduct pre-activity surveys for active nests no more than 10 days prior to the start of ground or vegetation disturbance to maximize the probability that nests that could potentially be impacted are detected. CDFW also recommends that surveys cover a sufficient area around each future project site to identify nests and determine their status. A sufficient area means any area potentially affected by a project. In addition to direct impacts (i.e., nest destruction), noise, vibration, and movement of workers or equipment could also affect nests. Prior to initiation of construction activities, CDFW recommends that a qualified biologist conduct a survey to establish a behavioral baseline of all identified nests. Once construction begins, CDFW recommends having a qualified biologist continuously monitor nests to detect behavioral changes resulting from each future project. If behavioral changes

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occur, CDFW recommends halting the work causing that change and consulting with CDFW for additional avoidance and minimization measures.

If continuous monitoring of identified nests by a qualified biologist is not feasible, CDFW recommends a minimum no-disturbance buffer of 250 feet around active nests of non-listed bird species and a 500-foot no-disturbance buffer around active nests of non-listed raptors. These buffers are advised to remain in place until the breeding season has ended or until a qualified biologist has determined the birds have fledged and are no longer reliant upon the nest or on-site parental care for survival. Variance from these no-disturbance buffers is possible when there is a compelling biological or ecological reason to do so, such as when the construction areas would be concealed from a nest site by topography. CDFW recommends that a qualified biologist advise and support any variance from these buffers and notify CDFW in advance of implementing a variance.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special-status species and natural communities detected during the Plan or tiered project surveys to the CNDDB. The CNDDB field survey form can be filled out and submitted online at the following link: <https://wildlife.ca.gov/Data/CNDDB/Submitting-Data>. The types of information reported to CNDDB can be found at the following link: <https://www.wildlife.ca.gov/Data/CNDDB/Plants-and-Animals>.

FILING FEES

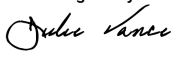
The Plan, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089).

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CONCLUSION

CDFW appreciates the opportunity to comment on the NOP to assist StanCOG in identifying and mitigating the Plan's impact on biological resources. More information on survey and monitoring protocols for sensitive species can be found at CDFW's website (<https://www.wildlife.ca.gov/Conservation/Survey-Protocols>). Questions regarding this letter or further coordination should be directed to John Riedel, Environmental Scientist, at (559) 807-1453 or john.riedel@wildlife.ca.gov.

Sincerely,

DocuSigned by:

FA83F09FE08945A...

Julie A. Vance
Regional Manager

ATTACHMENT

ec: State Clearinghouse
Governor's Office of Planning and Research
State.Clearinghouse@opr.ca.gov

Maggie Sepulveda,
U.S. Fish and Wildlife Service
margaret_sepulveda@fws.gov

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REFERENCES

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- U.S. Department of the Interior. 2001. Least Bell's Vireo Survey Guidelines. U.S. Fish and Wildlife Service, Carlsbad, California.
- U.S. Fish and Wildlife Service. 2003. Interim guidance on site assessment and field surveys for determining presence or a negative finding of the California tiger salamander. Sacramento, California.
- U.S. Fish and Wildlife Service. 2005. Revised guidance on site assessment and field surveys for the California red-legged frog. Sacramento, California.

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U.S. Fish and Wildlife Service. 2011. Standard Recommendations for the Protection of the San Joaquin Kit Fox Prior to or During Ground Disturbance. Sacramento, California.

Attachment 1**CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE
SPECIAL-STATUS SPECIES TABLE****PROJECT: 2026 Regional Transportation Plan & Sustainable
Communities Strategy****SCH No.: 2025040852**

Common Name	Scientific Name	Status	
		State	Federal
Riparian brush rabbit	<i>Sylvilagus bachmani riparius</i>	E	E
Bald eagle	<i>Haliaeetus leucocephalus</i>	E/FP	None
Least Bell's vireo	<i>Vireo bellii pusillus</i>	E	E
Western yellow-billed cuckoo	<i>Coccyzus americanus occidentalis</i>	E	T
Foothill yellow-legged frog - south Sierra Distinct Population Segment	<i>Rana boylei pop. 5</i>	E	T
Colusa grass	<i>Neostapfia colusana</i>	E	T
Delta button-celery	<i>Eryngium racemosum</i>	E	None
Hairy Orcutt grass	<i>Orcuttia Pilosa</i>	E	E
Hartweg's golden sunburst	<i>Pseudobahia bahiifolia</i>	E	E
San Joaquin Valley Orcutt grass	<i>Orcuttia inaequalis</i>	E	T
Succulent owl's-clover	<i>Castilleja campestris var. succulenta</i>	E	T
San Joaquin kit fox	<i>Vulpes macrotis mutica</i>	T	E
Swainson's hawk	<i>Buteo swainsoni</i>	T	None
Tricolored blackbird	<i>Agelaius tricolor</i>	T	None
California tiger salamander - central California Distinct Population Segment	<i>Ambystoma californiense pop. 1</i>	T	T
Golden eagle	<i>Aquila chrysaetos</i>	FP	
Western burrowing owl	<i>Athene cunicularia hypugaea</i>	C	None
Crotch's bumble bee	<i>Bombus crotchii</i>	C	None
Western bumble bee	<i>Bombus occidentalis</i>	C	None
Greene's tuctoria	<i>Tuctoria greenei</i>	R	None
Tracy's eriastrum	<i>Eriastrum tracyi</i>	R	None
Pallid bat	<i>Antrozous pallidus</i>	SSC	None

Townsend's big-eared bat	<i>Corynorhinus townsendii</i>	SSC	None
Loggerhead shrike	<i>Lanius ludovicianus</i>	SSC	None
Mountain plover	<i>Charadrius montanus</i>	SSC	None
Song sparrow	<i>Melospiza melodia pop. 1</i>	SSC	None
Yellow-breasted chat	<i>Icteria virens</i>	SSC	None
California red-legged frog	<i>Rana draytonii</i>	SSC	T
Northwestern pond turtle	<i>Actinemys marmorata</i>	SSC	PT
Western spadefoot	<i>Spea hammondi</i>	SSC	PT
Northern California legless lizard	<i>Anniella pulchra</i>	SSC	None
Green sturgeon – Southern Distinct Population Segment	<i>Acipenser medirostris pop. 1</i>	SSC	T
Hardhead	<i>Mylopharodon conocephalus</i>	SSC	None
Sacramento splittail	<i>Pogonichthys macrolepidotus</i>	SSC	None
Steelhead – Central Valley Distinct Population Segment	<i>Oncorhynchus mykiss irideus pop. 11</i>	SSC	T
E= Endangered, T=Threatened, C= Candidate for listing as Threatened and/or Endangered, R= Rare, SSC= Species of Special Concern, FP= Fully Protected, PT=Proposed Threatened			

Appendix B

Air Quality Emissions Calculations

StanCOG 2026 RTP/SCS

Air Quality Emissions

Table 4.3-6

Regional Air Pollutant Emissions – StanCOG Region

Scenario	VMT	ROG (tons/day)	NO _x (tons/day)	PM _{2.5} (tons/day) ¹	PM ₁₀ (tons/day) ¹
2023 Baseline	11,736,343	2.70	4.54	0.160	3.12
2049 with 2026 RTP/SCS	13,012,130	1.20	2.26	0.150	2.14
Net Change from 2023 Baseline	1,275,787	(1.50)	(2.27)	(0.01)	(0.98)

() denotes a negative number

¹ PM_{2.5} and PM₁₀ includes tire wear and brake wear emissions

Notes: The on-road mobile source criteria pollutant emissions estimates for 2022 RTP/SCS were calculated using CARB's EMFAC2021 emission inventory model. VMT data was provided by StanCOG.

Scenario	VMT	ROG	NO _x	PM _{2.5}	PM ₁₀
2049 Scenario B – Mixed Use with Transit Connections	12,838,939	-	-	-	-
2049 Scenario C – Mixed-Use with Jobs Focus	12,863,205	1.2	2.2	0.2	2.1
2049 Scenario D – Missing Middle with Increased ADU	12,829,464	-	-	-	-

Table 4.3-7

On-Road Mobile Source Particulate Matter Comparison

Scenario	PM ₁₀ Emissions (tons/day)	PM _{2.5} Emissions (tons/day)
2023 Baseline	3.116	0.160
2049 with 2026 RTP/SCS	2.136	0.150
Net Change from 2023 Baseline	-0.980	-0.010

() denotes a negative number.

Table 4.3-8**On-Road Mobile Source Diesel Toxics Comparison**

Scenario	Diesel PM _{2.5} (tons/day)	Diesel PM ₁₀ (tons/day)	Diesel NO _x (tons/day)	Diesel SO _x (tons/day)	Diesel CO (tons/day)
2023 Baseline	0.040	0.042	2.920	0.015	0.797
2049 with 2026 RTP/SCS	0.030	0.032	1.739	0.014	0.744
Net Change from 2023 Baseline	(0.010)	(0.010)	(1.182)	(0.001)	(0.053)

Scenario	Diesel PM _{2.5} (tons/day)	Diesel PM ₁₀ (tons/day)	Diesel NO _x (tons/day)	Diesel SO _x (tons/day)	Diesel CO (tons/day)
2049 Scenario C	0.029	0.032	1.719	0.014	0.736
Net Change from 2023 Baseline	(0.011)	(0.010)	(1.202)	(0.001)	(0.061)

Appendix C

Special Status Species

Table C-1 Special-Status Plant Species in the Regional Vicinity of the Project Site.

Scientific Name Common Name	Status Fed/State ESA CRPR	Habitat Requirements
<i>Acmispon rubriflorus</i> red-flowered bird's-foot trefoil	None/None G2/S2 1B.1	Annual herb. Cismontane woodland, valley and foothill grassland. Most recent sighting from sterile, red soils-volcanic mudflow deposits. Elevations: 655-1395ft. (200-425m.) Blooms Apr-Jun.
<i>Allium sharsmithiae</i> Sharsmith's onion	None/None G2/S2 1B.3	Perennial bulbiferous herb. Chaparral, cismontane woodland. Rocky, serpentinite. Elevations: 1310-3935ft. (400-1200m.) Blooms Mar-May.
<i>Astragalus tener</i> var. <i>tener</i> alkali milk-vetch	None/None G2T1/S1 1B.2	Annual herb. Playas, valley and foothill grassland, vernal pools. Alkaline. Elevations: 5-195ft. (1-60m.) Blooms Mar-Jun.
<i>Atriplex cordulata</i> var. <i>cordulata</i> heartscale	None/None GNRT2/S2 1B.2	Annual herb. Chenopod scrub, meadows and seeps, valley and foothill grassland. Alkaline (sometimes). Elevations: 0-1835ft. (0-560m.) Blooms Apr-Oct.
<i>Atriplex minuscula</i> lesser saltscale	None/None G2/S2 1B.1	Annual herb. Chenopod scrub, playas, valley and foothill grassland. Alkaline, sandy. Elevations: 50-655ft. (15-200m.) Blooms May-Oct.
<i>Atriplex persistens</i> vernal pool smallscale	None/None G2/S2 1B.2	Annual herb. Vernal pools. Alkaline vernal pools. Elevations: 35-375ft. (10-115m.) Blooms Jun-Oct.
<i>Atriplex subtilis</i> subtle orache	None/None G1/S1 1B.2	Annual herb. Valley and foothill grassland. Alkaline. Elevations: 130-330ft. (40-100m.) Blooms (Apr)Jun-Sep(Oct).
<i>Blepharizonia plumosa</i> big tarplant	None/None G1G2/S1S2 1B.1	Annual herb. Valley and foothill grassland. Clay (usually). Elevations: 100-1655ft. (30-505m.) Blooms Jul-Oct.
<i>Calycadenia hooveri</i> Hoover's calycadenia	None/None G2/S2 1B.3	Annual herb. Cismontane woodland, valley and foothill grassland. Rocky. Elevations: 215-985ft. (65-300m.) Blooms Jul-Sep.
<i>Calycadenia spicata</i> spicate calycadenia	None/None G3?/S3 1B.3	Cismontane woodland, Valley and foothill grassland. Adobe, Clay, Disturbed areas, Dry, Gravelly, Openings, Roadsides, Rocky 40-1400m. Blooms May-Sep.

Scientific Name Common Name	Status Fed/State ESA CRPR	Habitat Requirements
<i>Castilleja campestris</i> var. <i>succulenta</i> succulent owl's-clover	FT/SE G4?T2T3/S2S3 1B.2	Annual herb (hemiparasitic). Vernal pools. Moist places, often in acidic soils. Elevations: 165-2460ft. (50-750m.) Blooms (Mar)Apr-May.
<i>Caulanthus lemmonii</i> Lemmon's jewelflower	None/None G3/S3 1B.2	Annual herb. Pinyon and juniper woodland, valley and foothill grassland. Elevations: 260-5185ft. (80-1580m.) Blooms Feb-May.
<i>Cirsium fontinale</i> var. <i>campylon</i> Mt. Hamilton thistle	None/None G2T2/S2 1B.2	Perennial herb. Chaparral, cismontane woodland, valley and foothill grassland. Seeps, serpentinite. Elevations: 330-2920ft. (100-890m.) Blooms (Feb)Apr-Oct.
<i>Clarkia rostrata</i> beaked clarkia	None/None G2G3/S2S3 1B.3	Annual herb. Cismontane woodland, valley and foothill grassland. North-facing slopes; sometimes on sandstone. Elevations: 195-1640ft. (60-500m.) Blooms Apr-May.
<i>Cryptantha hooveri</i> Hoover's cryptantha	None/None GH/SH 1A	Annual herb. Inland dunes, valley and foothill grassland. In coarse sand. Elevations: 30-490ft. (9-150m.) Blooms Apr-May.
<i>Cryptantha mariposae</i> Mariposa cryptantha	None/None G2G3/S2S3 1B.3	Annual herb. Chaparral. On serpentine outcrops. Elevations: 655-2135ft. (200-650m.) Blooms Apr-Jun.
<i>Delphinium californicum</i> ssp. <i>interius</i> Hospital Canyon larkspur	None/None G3T3/S3 1B.2	Perennial herb. Chaparral, cismontane woodland, coastal scrub. In wet, boggy meadows, openings in chaparral and in canyons. Elevations: 640-3595ft. (195-1095m.) Blooms Apr-Jun.
<i>Downingia pusilla</i> dwarf downingia	None/None GU/S2 2B.2	Annual herb. Valley and foothill grassland, vernal pools. Vernal lake and pool margins with a variety of associates. In several types of vernal pools. Elevations: 5-1460ft. (1-445m.) Blooms Mar-May.
<i>Eryngium racemosum</i> Delta button-celery	None/SE G1/S1 1B.1	Annual/perennial herb. Riparian scrub. Seasonally inundated floodplain on clay. Elevations: 10-100ft. (3-30m.) Blooms (May)Jun-Oct.
<i>Eryngium spinosepalum</i> spiny-sepaled button-celery	None/None G2/S2 1B.2	Annual/perennial herb. Valley and foothill grassland, vernal pools. Some sites on clay soil of granitic origin; vernal pools, within grassland. Elevations: 260-3200ft. (80-975m.) Blooms Apr-Jun.

Scientific Name Common Name	Status Fed/State ESA CRPR	Habitat Requirements
<i>Erythranthe marmorata</i> Stanislaus monkeyflower	None/None G2?/S2? 1B.1	Annual herb. Cismontane woodland, lower montane coniferous forest. Elevations: 330-2955ft. (100-900m.) Blooms Mar-May.
<i>Eschscholzia rhombipetala</i> diamond-petaled California poppy	None/None G1/S1 1B.1	Annual herb. Valley and foothill grassland. Alkaline, clay slopes and flats. Elevations: 0-3200ft. (0-975m.) Blooms Mar-Apr.
<i>Euphorbia hooveri</i> Hoover's spurge	FT/None G1/S1 1B.2	Annual herb. Vernal pools. Vernal pools on volcanic mudflow or clay substrate. Elevations: 80-820ft. (25-250m.) Blooms Jul-Sep(Oct).
<i>Fritillaria falcata</i> talus fritillary	None/None G2/S2 1B.2	Perennial bulbiferous herb. Chaparral, cismontane woodland, lower montane coniferous forest. Mostly on serpentine talus, but occasionally found on granitics. Elevations: 985-5005ft. (300-1525m.) Blooms Mar-May.
<i>Lagophylla dichotoma</i> forked hare-leaf	None/None G1/S1 1B.1	Annual herb. Cismontane woodland, valley and foothill grassland. Sometimes clay. Elevations: 150-1100ft. (45-335m.) Blooms Apr-May.
<i>Lasthenia chrysantha</i> alkali-sink goldfields	None/None G2/S2 1B.1	Annual herb. Vernal pools. Alkaline. Elevations: 0-655ft. (0-200m.) Blooms Feb-Apr.
<i>Legenere limosa</i> legenere	None/None G2/S2 1B.1	Annual herb. Vernal pools. In beds of vernal pools. 1-. Elevations: 5-2885ft. (1-880m.) Blooms Apr-Jun.
<i>Leptosyne hamiltonii</i> Mt. Hamilton coreopsis	None/None G2/S2 1B.2	Annual herb. Cismontane woodland. On steep shale talus with open southwestern exposure. Elevations: 1805-4265ft. (550-1300m.) Blooms Mar-May.
<i>Lomatium observatorium</i> Mt. Hamilton lomatium	None/None G1/S1 1B.2	Perennial herb. Cismontane woodland. Open to partially shaded openings in Pinus coulteri-oak woodland. Sedimentary Franciscan rocks and volcanics. Elevations: 4000-4365ft. (1219-1330m.) Blooms Mar-May.
<i>Madia radiata</i> showy golden madia	None/None G3/S3 1B.1	Annual herb. Cismontane woodland, valley and foothill grassland. Mostly on adobe clay in grassland or among shrubs. Elevations: 80-3985ft. (25-1215m.) Blooms Mar-May.

Scientific Name Common Name	Status Fed/State ESA CRPR	Habitat Requirements
<i>Malacothamnus hallii</i> Hall's bushmallow	None/None G2/S2 1B.2	Perennial deciduous shrub. Chaparral, coastal scrub. Some populations on serpentine. Elevations: 35-2495ft. (10-760m.) Blooms (Apr)May-Sep(Oct).
<i>Monardella leucocephala</i> Merced monardella	None/None GX/SX 1A	Annual herb. Valley and foothill grassland. Known from riverbeds, moist sandy depressions. Requires moist subalkaline sands associated with low elev grassland. Elevations: 115-330ft. (35-100m.) Blooms May-Aug.
<i>Navarretia gowenii</i> Lime Ridge navarretia	None/None G1/S1 1B.1	Annual herb. Chaparral. On calcium carbonate-rich soil with high clay content. Elevations: 590-1000ft. (180-305m.) Blooms May-Jun.
<i>Navarretia nigelliformis</i> ssp. <i>radians</i> shining navarretia	None/None G4T2T3/S2S3 1B.2	Annual herb. Cismontane woodland, valley and foothill grassland, vernal pools. Apparently in grassland, and not necessarily in vernal pools. Elevations: 215-3280ft. (65-1000m.) Blooms (Mar)Apr-Jul.
<i>Neostapfia colusana</i> Colusa grass	FT/SE G1/S1 1B.1	Annual herb. Vernal pools. Usually in the bottoms of large, or deep vernal pools; adobe soils. Elevations: 15-655ft. (5-200m.) Blooms May-Aug.
<i>Orcuttia inaequalis</i> San Joaquin Valley Orcutt grass	FT/SE G1/S1 1B.1	Annual herb. Vernal pools. Elevations: 35-2475ft. (10-755m.) Blooms Apr-Sep.
<i>Orcuttia pilosa</i> hairy Orcutt grass	FE/SE G1/S1 1B.1	Annual herb. Vernal pools. Elevations: 150-655ft. (46-200m.) Blooms May-Sep.
<i>Phacelia phacelioides</i> Mt. Diablo phacelia	None/None G2G3/S2S3 1B.2	Annual herb. Chaparral, cismontane woodland. Adjacent to trails, on rock outcrops and talus slopes; sometimes on serpentine. Elevations: 1640-4495ft. (500-1370m.) Blooms Apr-May.
<i>Plagiobothrys verrucosus</i> warty popcornflower	None/None G4G5/S1 2B.1	Annual herb. Chaparral. Shale substrate. Elevations: 2000-2495ft. (610-760m.) Blooms Apr-May.
<i>Pseudobahia bahiifolia</i> Hartweg's golden sunburst	FE/SE G1/S1 1B.1	Annual herb. Cismontane woodland, valley and foothill grassland. Clay soils, often acidic. Predominantly on the northern slopes of knolls, but also along shady creeks or near vernal pools. Elevations: 50-490ft. (15-150m.) Blooms Mar-Apr.

Scientific Name Common Name	Status Fed/State ESA CRPR	Habitat Requirements
<i>Puccinellia simplex</i> California alkali grass	None/None G2/S2 1B.2	Annual herb. Chenopod scrub, meadows and seeps, valley and foothill grassland, vernal pools. Alkaline, vernal mesic. Sinks, flats, and lake margins. Elevations: 5-3050ft. (2-930m.) Blooms Mar-May.
<i>Ravenella exigua</i> chaparral harebell	None/None G2/S2 1B.2	Chaparral (rocky, usually serpentine). Rocky sites, usually on serpentine in chaparral. 275-1250m. Blooms May-Jun.
<i>Ravenella sharsmithiae</i> Sharsmith's harebell	None/None G1G2/S1 1B.2	Chaparral (rocky, serpentine). Serpentine barrens. 490-855m. Blooms Apr-Jun.
<i>Sphenopholis obtusata</i> prairie wedge grass	None/None G5/S2 2B.2	Perennial herb. Cismontane woodland, meadows and seeps. Open moist sites, along rivers and springs, alkaline desert seeps. Elevations: 985-6560ft. (300-2000m.) Blooms Apr-Jul.
<i>Stuckenia striata</i> broadleaf pondweed	None/None G3G4Q/S2S3 2B.3	Marshes and swamps. Lakes, ponds, rivers, and drainage canals. - -70-2135m. Blooms (Jun)Jul-Aug.
<i>Tuctoria greenei</i> Greene's tuctoria	FE/SR G1/S1 1B.1	Annual herb. Vernal pools. Vernal pools in open grasslands. Elevations: 100-3510ft. (30-1070m.) Blooms May-Jul(Sep).
<i>Wolffia brasiliensis</i> Brazilian watermeal	None/None G5/S2 2B.3	Perennial herb (aquatic). Marshes and swamps. Shallow freshwater marshes. Elevations: 65-330ft. (20-100m.) Blooms Apr-Dec.

Regional Vicinity refers to within a 8-quad search radius of site.

Status (Federal/State)

FE = Federal Endangered
 FT = Federal Threatened
 FPE = Federal Proposed Endangered
 FPT = Federal Proposed Threatened
 FD = Federal Delisted
 FC = Federal Candidate
 SE = State Endangered
 ST = State Threatened
 SCE = State Candidate Endangered
 SCT = State Candidate Threatened
 SR = State Rare

CRPR (CNPS California Rare Plant Rank)

1A = Presumed extirpated in California, and rare or extinct elsewhere
 1B = Rare, Threatened, or Endangered in California and elsewhere
 2A = Presumed extirpated in California, but common elsewhere
 2B = Rare, Threatened, or Endangered in California, but more common elsewhere

CRPR Threat Code Extension

.1 = Seriously endangered in California (>80% of occurrences threatened/high degree and immediacy of threat)
 .2 = Moderately threatened in California (20-80% of occurrences threatened/moderate degree and immediacy of threat)
 .3 = Not very endangered in California (<20% of occurrences threatened/low degree and immediacy of threat)

Scientific Name	Status	
Common Name	Fed/State ESA	Habitat Requirements
	CRPR	
Other Statuses		
G1 or S1	Critically Imperiled Globally or Subnationally (state)	
G2 or S2	Imperiled Globally or Subnationally (state)	
G3 or S3	Vulnerable to extirpation or extinction Globally or Subnationally (state)	
G4/5 or S4/5	Apparently secure, common and abundant	
GH or SH	Possibly Extirpated – missing; known from only historical occurrences but still some hope of rediscovery	
Additional notations may be provided as follows		
T –	Intraspecific Taxon (subspecies, varieties, and other designations below the level of species)	
Q –	Questionable taxonomy that may reduce conservation priority	
? –	Inexact numeric rank	

Table C-2 Special-Status Wildlife Species in the Regional Vicinity of the Project Site

Scientific Name Common Name	Status Fed/State ESA CDFW	Habitat Requirements
Invertebrates		
<i>Bombus caliginosus</i> obscure bumble bee	None/None G2G3/S1S2	Coastal areas from Santa Barbara County north to Washington state. Food plant genera include Baccharis, Cirsium, Lupinus, Lotus, Grindelia and Phacelia.
<i>Bombus crotchii</i> Crotch's bumble bee	None/SCE G2/S2	Coastal California east to the Sierra-Cascade crest and south into Mexico. Food plant genera include Antirrhinum, Phacelia, Clarkia, Dendromecon, Eschscholzia, and Eriogonum.
<i>Bombus morrisoni</i> Morrison bumble bee	None/None G3/S1S2	From the Sierra-Cascade ranges eastward across the intermountain west. Food plant genera include Cirsium, Cleome, Helianthus, Lupinus, Chrysothamnus, and Melilotus.
<i>Bombus pensylvanicus</i> American bumble bee	None/None G3G4/S2	Long-tongued; forages on a wide variety of flowers including vetches (Vicia), clovers (Trifolium), thistles (Cirsium), sunflowers (Helianthus), etc. Nests above ground under long grass or underground. Queens overwinter in rotten wood or underground.
<i>Branchinecta conservatio</i> Conservancy fairy shrimp	FE/None G2/S2	Endemic to the grasslands of the northern two-thirds of the Central Valley; found in large, turbid pools. Inhabit astatic pools located in swales formed by old, braided alluvium; filled by winter/spring rains, last until June.
<i>Branchinecta lynchi</i> vernal pool fairy shrimp	FT/None G3/S3	Endemic to the grasslands of the Central Valley, Central Coast mountains, and South Coast mountains, in astatic rain-filled pools. Inhabit small, clear-water sandstone-depression pools and grassed swale, earth slump, or basalt-flow depression pools.
<i>Calicina breva</i> Stanislaus harvestman	None/None G1/S1	Known only from the type locality, 1.6 km south of Knight's Ferry, Stanislaus County. Found under basalt rocks in grassland.
<i>Ceratochrysis menkei</i> Menke's cuckoo wasp	None/None G2/S2	Obligate cuckoo wasp that requires habitats where its solitary-nesting host bees or wasps are active, typically open, sunny sites with exposed or sandy soils and available nest cavities. Known from only two widely separated localities in California, near Death Valley Junction in Inyo County and Del Puerto Canyon in Stanislaus County.
<i>Desmocerus californicus dimorphus</i> valley elderberry longhorn beetle	FT/None G3T3/S3	Occurs only in the Central Valley of California, in association with blue elderberry (Sambucus mexicana). Prefers to lay eggs in elderberries 2-8 inches in diameter; some preference shown for "stressed" elderberries.
<i>Eucerceris ruficeps</i> redheaded sphecid wasp	None/None G1G3/S2	Central California interior dunes. Nest in hard-packed sand utilizing abandoned halictine bee burrows.
<i>Gonidea angulata</i> western ridged mussel	None/None G3/S2	Primarily creeks and rivers and less often lakes. Originally in most of state, now extirpated from Central and Southern California. .

Scientific Name Common Name	Status Fed/State ESA CDFW	Habitat Requirements
<i>Lepidurus packardii</i> vernal pool tadpole shrimp	FE/None G3/S3	Inhabits vernal pools and swales in the Sacramento Valley containing clear to highly turbid water. Pools commonly found in grass-bottomed swales of unplowed grasslands. Some pools are mud-bottomed and highly turbid.
<i>Linderiella occidentalis</i> California linderiella	None/None G2G3/S2S3	Seasonal pools in unplowed grasslands with old alluvial soils underlain by hardpan or in sandstone depressions. Water in the pools has very low alkalinity, conductivity, and total dissolved solids.
<i>Lytta moesta</i> moestan blister beetle	None/None G2/S2	Central California. .
<i>Pyrgulopsis diablensis</i> Diablo Range pyrg	None/None G1/S1	Found in unnamed creek in Del Puerto Canyon. Stream is poorly shaded and slightly disturbed from pastoral and recreational activities.
<i>Rhaphiomidas trochilus</i> San Joaquin Valley giant flower-loving fly	None/None G1/S1	Historically known from, and endemic to, sandy soils of the San Joaquin Valley from Antioch Dunes in Contra Costa Co south to Sand Ridge in Kern Co. Associated with sandy soils such as riverine deposits and sand dunes with relatively sparse vegetation. Adult flight from Jul to Oct and life span is about 3 days and do not visit flowers/nectar. Females deposit eggs in and on the surface of sandy soil. Larvae burrow in fine sands up to 10 feet deep and are known to live for 3 years prior to pupation.
Fish		
<i>Acipenser medirostris</i> pop. 1 green sturgeon - southern DPS	FT/None G2T1/S1 SSC	Spawning site fidelity. Spawns in the Sacramento, Feather and Yuba Rivers. Presence in upper Stanislaus and San Joaquin Rivers may indicate spawning. Non-spawning adults occupy marine/estuarine waters. Delta Estuary is important for rearing juveniles. Spawning occurs primarily in cool (11-15 C) sections of mainstem rivers in deep pools (8-9 meters) with substrate containing small to medium sized sand, gravel, cobble, or boulder.
<i>Hesperoleucus symmetricus symmetricus</i> central California roach	None/None GNRT3/S3 SSC	Generally found in small streams of the Sierra Nevada foothills flowing into the Central Valley and are particularly well adapted to life in intermittent watercourses; dense populations are frequently observed in isolated pools. Rarely above 1,000 meters in elevation. Tolerant of wide temperature ranges and dissolved oxygen levels. Most abundant when only species present, occupying large pools in open water. With other fish, found in shallow margins, pool edges, or dense cover.
<i>Mylopharodon conocephalus</i> hardhead	None/None G3/S3 SSC	Low to mid-elevation streams in the Sacramento-San Joaquin drainage. Also present in the Russian River. Clear, deep pools with sand-gravel-boulder bottoms and slow water velocity. Not found where exotic centrarchids predominate.

Scientific Name Common Name	Status Fed/State ESA CDFW	Habitat Requirements
<i>Oncorhynchus mykiss irideus</i> pop. 11 steelhead - Central Valley DPS	FT/None G5T2Q/S2 SSC	Populations in the Sacramento and San Joaquin rivers and their tributaries. .
<i>Pogonichthys macrolepidotus</i> Sacramento splittail	None/None G3/S3 SSC	Endemic to the lakes and rivers of the Central Valley, but now confined to the Delta, Suisun Bay and associated marshes. Slow moving river sections, dead end sloughs. Requires flooded vegetation for spawning and foraging for young.
Reptiles		
<i>Actinemys marmorata</i> northwestern pond turtle	FPT/None G2/SNR SSC	A thoroughly aquatic turtle of ponds, marshes, rivers, streams and irrigation ditches, usually with aquatic vegetation, below 6000 ft elevation. Needs basking sites and suitable (sandy banks or grassy open fields) upland habitat up to 0.5 km from water for egg-laying. Occurs in northern California, south along the Sierra Nevada Mountains and the Coast Range down to Monterey and Kern Counties.
<i>Anniella pulchra</i> Northern California legless lizard	None/None G3/S2S3 SSC	Sandy or loose loamy soils under sparse vegetation. Soil moisture is essential. They prefer soils with a high moisture content.
<i>Masticophis flagellum ruddocki</i> San Joaquin coachwhip	None/None G5T2T3/S3 SSC	Open, dry habitats with little or no tree cover. Found in valley grassland and saltbush scrub in the San Joaquin Valley. Needs mammal burrows for refuge and oviposition sites.
<i>Masticophis lateralis euryxanthus</i> Alameda whipsnake	FT/ST G4T2/S2	Typically found in chaparral and scrub habitats but will also use adjacent grassland, oak savanna and woodland habitats. Mostly south-facing slopes and ravines, with rock outcrops, deep crevices or abundant rodent burrows, where shrubs form a vegetative mosaic with oak trees and grasses.
<i>Phrynosoma blainvillii</i> coast horned lizard	None/None G4/S4 SSC	Frequents a wide variety of habitats, most common in lowlands along sandy washes with scattered low bushes. Open areas for sunning, bushes for cover, patches of loose soil for burial, and abundant supply of ants and other insects.
Amphibians		
<i>Ambystoma californiense</i> pop. 1 California tiger salamander - central California DPS	FT/ST G3T3/S3 WL	Lives in vacant or mammal-occupied burrows throughout most of the year; in grassland, savanna, or open woodland habitats. Need underground refuges, especially ground squirrel burrows, and vernal pools or other seasonal water sources for breeding.
<i>Rana boylei</i> pop. 4 foothill yellow-legged frog - central coast DPS	FT/SE G3T2/S2	San Francisco Peninsula and Diablo Range south of San Francisco Bay Estuary, and south through the Santa Cruz and Gabilan Mountains east of the Salinas River in the southern inner Coast Ranges. Partly shaded shallow streams and riffles with a rocky

Scientific Name Common Name	Status Fed/State ESA CDFW	Habitat Requirements
		substrate in a variety of habitats. Needs at least some cobble-sized substrate for egg-laying and at least 15 weeks to attain metamorphosis.
<i>Rana draytonii</i> California red-legged frog	FT/None G2G3/S2S3 SSC	Lowlands and foothills in or near permanent sources of deep water with dense, shrubby or emergent riparian vegetation. Requires 11-20 weeks of permanent water for larval development. Must have access to estivation habitat.
<i>Spea hammondi</i> western spadefoot	FPT/None G2G3/S3S4 SSC	Occurs primarily in grassland habitats, but can be found in valley-foothill hardwood woodlands. Vernal pools are essential for breeding and egg-laying.
Birds		
<i>Agelaius tricolor</i> tricolored blackbird	None/ST G3/S2 SSC	Highly colonial species, most numerous in Central Valley and vicinity. Largely endemic to California. Requires open water, protected nesting substrate, and foraging area with insect prey within a few km of the colony.
<i>Anarhynchus montanus</i> mountain plover	None/None G3/S2 SSC	Short grasslands, freshly plowed fields, newly sprouting grain fields, and sometimes sod farms. Short vegetation, bare ground, and flat topography. Prefers grazed areas and areas with burrowing rodents.
<i>Aquila chrysaetos</i> golden eagle	None/None G5/S3 FP WL	Rolling foothills, mountain areas, sage-juniper flats, and desert. Cliff-walled canyons provide nesting habitat in most parts of range; also, large trees in open areas.
<i>Athene cunicularia</i> burrowing owl	None/SCE G4/S2 SSC	Open, dry annual or perennial grasslands, deserts, and scrublands characterized by low-growing vegetation. Subterranean nester, dependent upon burrowing mammals, most notably, the California ground squirrel.
<i>Buteo swainsoni</i> Swainson's hawk	None/ST G5/S4	Breeds in grasslands with scattered trees, juniper-sage flats, riparian areas, savannahs, and agricultural or ranch lands with groves or lines of trees. Requires adjacent suitable foraging areas such as grasslands, or alfalfa or grain fields supporting rodent populations.
<i>Coccyzus americanus occidentalis</i> western yellow-billed cuckoo	FT/SE G5T2T3/S1	Riparian forest nester, along the broad, lower flood-bottoms of larger river systems. Nests in riparian jungles of willow, often mixed with cottonwoods, with lower story of blackberry, nettles, or wild grape.
<i>Haliaeetus leucocephalus</i> bald eagle	FD/SE G5/S3 FP	Ocean shore, lake margins, and rivers for both nesting and wintering. Most nests within 1 mile of water. Nests in large, old-growth, or dominant live tree with open branches, especially ponderosa pine. Roosts communally in winter.

Scientific Name Common Name	Status Fed/State ESA CDFW	Habitat Requirements
<i>Icteria virens</i> yellow-breasted chat	None/None G5/S4 SSC	Summer resident; inhabits riparian thickets of willow and other brushy tangles near watercourses. Nests in low, dense riparian, consisting of willow, blackberry, wild grape; forages and nests within 10 ft of ground.
<i>Lanius ludovicianus</i> loggerhead shrike	None/None G4/S4 SSC	Broken woodlands, savannah, pinyon-juniper, Joshua tree, and riparian woodlands, desert oases, scrub and washes. Prefers open country for hunting, with perches for scanning, and fairly dense shrubs and brush for nesting.
<i>Melospiza melodia pop. 1</i> song sparrow ("Modesto" population)	None/None G5T3?Q/S3? SSC	Central lower basin of Great Valley, from Colusa County south to Stanislaus County and east of Suisun Marshes. Breeds chiefly below 200 feet elevation. Freshwater marshes, riparian thickets, sparsely vegetated irrigation canals, and Valley Oak restoration sites. Cover consists of willow and nettle thickets, growths of tules and cattails, and riparian oak forests with sufficient understory of blackberry.
<i>Vireo bellii pusillus</i> least Bell's vireo	FE/SE G5T2/S3	Summer resident of Southern California in low riparian in vicinity of water or in dry river bottoms; below 2000 ft. Nests placed along margins of bushes or on twigs projecting into pathways, usually willow, Baccharis, mesquite.
Mammals		
<i>Antrozous pallidus</i> pallid bat	None/None G4/S3 SSC	Found in a variety of habitats including deserts, grasslands, shrublands, woodlands, and forests. Most common in open, dry habitats with rocky areas for roosting. Roosts in crevices of rock outcrops, caves, mine tunnels, buildings, bridges, and hollows of live and dead trees which must protect bats from high temperatures. Very sensitive to disturbance of roosting sites.
<i>Corynorhinus townsendii</i> Townsend's big-eared bat	None/None G4/S2 SSC	Occurs throughout California in a wide variety of habitats. Most common in mesic sites, typically coniferous or deciduous forests. Roosts in the open, hanging from walls & ceilings in caves, lava tubes, bridges, and buildings. This species is extremely sensitive to human disturbance.
<i>Dipodomys heermanni dixonii</i> Merced kangaroo rat	None/None G4T2/S2	Grassland and savanna communities in eastern Merced and Stanislaus counties. Needs fine, deep, well-drained soil for burrowing. Granivorous, but also eats forbs and green grasses.
<i>Eumops perotis californicus</i> western mastiff bat	None/None G4G5T4/S3S4 SSC	Occurs in open, semi-arid to arid habitats, including coniferiferous and deciduous woodlands, coastal scrub, grasslands, and chaparral. Roosts in crevices in cliff faces and caves, and buildings. Roosts typically occur high above ground.
<i>Lasiurus frantzii</i> western red bat	None/None G4/S3 SSC	Roosts primarily in trees, 2-40 ft above ground, from sea level up through mixed conifer forests. Prefers habitat edges and mosaics with trees that are protected from above and open below with open areas for foraging.

Scientific Name Common Name	Status Fed/State ESA CDFW	Habitat Requirements
<i>Neotoma fuscipes riparia</i> riparian (=San Joaquin Valley) woodrat	FE/None G5T1/S1 SSC	Occurs in riparian habitats along the San Joaquin, Stanislaus, and Tuolumne rivers. Builds middens out of grasses, leaves, and woody debris.
<i>Perognathus inornatus</i> San Joaquin pocket mouse	None/None G3/S2S3	Grassland, oak savanna and arid scrubland in the southern Sacramento Valley, Salinas Valley, San Joaquin Valley and adjacent foothills, south to the Mojave Desert. Associated with fine-textured, sandy, friable soils.
<i>Sylvilagus bachmani riparius</i> riparian brush rabbit	FE/SE GNRT2/S2	Riparian areas on the San Joaquin River in northern Stanislaus County. Dense thickets of wild rose, willows, and blackberries.
<i>Taxidea taxus</i> American badger	None/None G5/S3 SSC	Most abundant in drier open stages of most shrub, forest, and herbaceous habitats, with friable soils. Needs sufficient food, friable soils and open, uncultivated ground. Preys on burrowing rodents. Digs burrows.
<i>Vulpes macrotis mutica</i> San Joaquin kit fox	FE/ST G4T2/S3	Annual grasslands or grassy open stages with scattered shrubby vegetation. Need loose-textured sandy soils for burrowing, and suitable prey base.
Status (Federal/State) FE = Federal Endangered FT = Federal Threatened FPE = Federal Proposed Endangered FPT = Federal Proposed Threatened FD = Federal Delisted FC = Federal Candidate SE = State Endangered ST = State Threatened SCE = State Candidate Endangered SCT = State Candidate Threatened SR = State Rare SD = State Delisted SSC = CDFW Species of Special Concern FP = CDFW Fully Protected WL = CDFW Watch List Other Statuses G1 or S1 Critically Imperiled Globally or Subnationally (state) G2 or S2 Imperiled Globally or Subnationally (state)		

Scientific Name Common Name	Status Fed/State ESA CDFW	Habitat Requirements
G3 or S3	Vulnerable to extirpation or extinction Globally or Subnationally (state)	
G4/5 or S4/5	Apparently secure, common and abundant	
GH or SH	Possibly Extirpated – missing; known from only historical occurrences but still some hope of rediscovery	
Additional notations may be provided as follows		
T – Intraspecific Taxon (subspecies, varieties, and other designations below the level of species)		
Q – Questionable taxonomy that may reduce conservation priority		
? – Inexact numeric rank		

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Appendix D

Energy Generation and Consumption
Calculations

StanCOG 2026 RTP/SCS

Energy Consumption

Table 4.6-1 2024 Electricity and Natural Gas Consumption in the StanCOG Region

County	2024 Electricity Consumption (GWh) ¹	Electricity Consumption Per Capita Consumption (kWh)	Electricity Consumption Statewide Proportion	Natural Gas Consumption 2024 (MMthm) ²	Natural Gas Consumption Per Capita Consumption (thm)	Natural Gas Consumption Statewide Proportion
Stanislaus	5,200	9,433	1.8%	194.14	352.15	1.7%

¹Electricity consumption is quantified in Millions of Kilowatt-Hours (GWh), while per capita electricity is quantified in Kilowatt hours (kWh)

²Natural gas consumption is quantified in Millions of Therms (MMthm), while per capita natural gas consumption is Quantified in Therms (thm).

Note: The per capita consumption for natural gas and electricity are determined by using 2024 data from the CEC for overall county wide consumption and divided by the 2023 county population provided by StanCOG (551,297).

	2024 Consumption	
California NG Consumption	11,103,519,895	Consumption (thm)
California Electricity Consumption	282,782,592,300	Consumption (kWh)

Table 4.6-2 Fuel Consumption in StanCOG Region (2024)

Fuel	2024 Annual Fuel Use (million gallons)	2024 Annual Fuel Use (million Btu)	2024 Daily Energy Use (million Btu)	2024 Daily Per Capita Energy Use (thousand Btu)
Gasoline	229	25,141,037	68,879.55	124.94
Diesel	64	8,157,440	22,349.15	40.54
Total	293	33,298,477	91,228.70	165.48

Btu = British Thermal Units

2023 Baseline

BTU per VMT Conversion Factor	
91,228,703,217	btu
11,736,343	daily vmt
4,283,765,195	annual vmt
7,773	btu/vmt

Regional Population Estimates	
2023	551,297
2049	602,220

Regional Household Forecast Estimates	
2023	175,552
2049	191,751

Table 4.6-5 Transportation Energy Use

Year	Daily VMT	Direct Energy Use (Daily MMBtu)	Per Household Energy Use (Daily Thousand Btu)	Per-Capita Energy Use (Daily thousand Btu)
2023	11,736,343	91,229	519.7	165.5
Proposed 2026 RTP/SCS in 2049	13,012,130	101,146	527.5	168.0
Change % (Baseline vs. Proposed 2026 RTP/SCS)	11%	11%	1.5%	1.5%

Appendix E

StanCOG Transportation Model

Appendix J – Travel Demand Model Validation Report

TECHNICAL MEMORANDUM

Date: 6/30/2026

To: Stanislaus Council of Governments

From: Lawrence Liao, ETG

Subject: StanCOG 2026 RTP/SCS Model Validation Memo

This memorandum presents the development and validation of the Stanislaus Council of Governments (StanCOG) travel forecast model in support of 2026 StanCOG Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

INTRODUCTION

The 2022 RTP/SCS StanCOG model contains 2019, and 2046 model years. Year 2023 was chosen as the base year for 2026 RTP/SCS model update after reviewing the population and employment projections in the latest DOF report “California Department of Finance. Demographic Research Unit. Report P-2A: Total Population Projections, California Counties, 2020-2070 (Baseline 2024 Population Projections; Vintage 2026 Release). Sacramento: California. March 2026.” and the “2025 Stanislaus County Demographic and Employment Forecast” report by University of the Pacific (UOP) Center for Business & Policy Research.

2023 MODEL DEVELOPMENT

A 2023 model year scenario was developed to represent the base year conditions for the 2026 RTP/SCS model.

1. 2023 SOCIOECONOMIC DATA

The total 2023 household and population in Stanislaus County were based on the latest DOF projections; while the total 2023 employment in Stanislaus County were based on the UOP projection as follows:

Table 1. 2023 Socioeconomic Data in Stanislaus County

	Household	Population	Employment
Stanislaus County	175,552	551,297	269,939

The distribution of 2023 household, population and employment among the local areas in Stanislaus County were calibrated based on the 2025 projects in UOP report, as shown below.

Table 2. Local Area Population Forecast in Stanislaus County

Location	2025	2030	2035	2040	2045	2050
Ceres City	49,212	49,471	50,097	50,786	51,625	52,514
Hughson City	7,465	7,511	7,621	7,743	7,891	8,049
Modesto City	218,093	219,259	222,097	225,167	228,914	232,868
Newman City	12,317	12,412	12,642	12,898	13,210	13,544
Oakdale City	23,132	23,271	23,607	23,977	24,429	24,909
Patterson City	23,811	24,016	24,594	25,062	25,669	26,263
Riverbank City	24,817	24,954	25,283	25,646	26,088	26,557
Turlock City	72,504	72,794	73,382	74,256	75,270	76,414
Waterford City	9,104	9,150	9,263	9,387	9,537	9,697
Unincorporated Central	72,536	72,766	73,319	73,925	74,658	75,430
Unincorporated Northeast	10,054	10,105	10,227	10,361	10,524	10,697
Unincorporated South	20,241	20,325	20,526	20,747	21,014	21,297
Unincorporated West	8,620	8,669	8,786	8,916	9,074	9,242
<i>(Sub-Total Unincorporated)</i>	<u>111,452</u>	<u>111,865</u>	<u>112,859</u>	<u>113,949</u>	<u>115,271</u>	<u>116,665</u>
Stanislaus County	551,907	554,704	561,445	568,871	577,903	587,479

Table 3. Local Area Household Forecast in Stanislaus County

Location	2025	2030	2035	2040	2045	2050
Ceres City	13,467	13,534	13,696	13,875	14,092	14,322
Hughson City	2,376	2,391	2,428	2,469	2,519	2,572
Modesto City	73,564	73,942	74,879	75,872	77,090	78,368
Newman City	3,612	3,638	3,702	3,773	3,859	3,951
Oakdale City	8,138	8,186	8,302	8,431	8,588	8,755
Patterson City	6,469	6,534	6,746	6,873	7,051	7,205
Riverbank City	7,265	7,307	7,407	7,518	7,653	7,797
Turlock City	23,953	24,033	24,153	24,437	24,752	25,132
Waterford City	2,617	2,630	2,662	2,697	2,740	2,786
Unincorporated Central	21,458	21,543	21,749	21,975	22,249	22,538
Unincorporated Northeast	3,631	3,650	3,694	3,743	3,802	3,865
Unincorporated South	6,536	6,564	6,634	6,711	6,805	6,903
Unincorporated West	2,653	2,667	2,702	2,741	2,789	2,839
<i>(Sub-Total Unincorporated)</i>	<u>34,278</u>	<u>34,424</u>	<u>34,779</u>	<u>35,170</u>	<u>35,644</u>	<u>36,146</u>
Stanislaus County	175,744	176,627	178,771	181,134	184,009	187,057

Table 4. Local Area Employment Forecast in Stanislaus County

Location	2024	2025	2030	2035	2040	2045	2050
Ceres City	24,716	24,626	24,779	25,347	25,844	26,350	26,880
Hughson City	1,315	1,310	1,317	1,346	1,370	1,395	1,420
Modesto City	112,867	112,638	113,860	116,719	119,270	121,952	124,788
Newman City	2,217	2,215	2,237	2,287	2,334	2,382	2,435
Oakdale City	9,383	9,340	9,381	9,585	9,765	9,943	10,125
Patterson City	10,973	10,996	11,295	11,760	12,198	12,641	13,126
Riverbank City	5,408	5,387	5,392	5,481	5,566	5,660	5,765
Turlock City	37,272	37,165	37,420	38,236	38,970	39,727	40,531
Waterford City	1,060	1,054	1,063	1,097	1,125	1,152	1,180
Unincorporated Central	43,938	43,767	43,946	44,820	45,617	46,382	47,170
Unincorporated Northeast	2,908	2,894	2,903	2,966	3,017	3,057	3,095
Unincorporated South	10,456	10,426	10,455	10,629	10,782	10,909	11,033
Unincorporated West	5,442	5,436	5,420	5,451	5,482	5,499	5,516
<i>(Sub-Total Unincorporated)</i>	<u>62,743</u>	<u>62,524</u>	<u>62,723</u>	<u>63,867</u>	<u>64,899</u>	<u>65,847</u>	<u>66,814</u>
Stanislaus County	267,954	267,255	269,469	275,725	281,340	287,050	293,063

2. 2023 HIGHWAY NETWORK

The 2023 highway network was developed as follows:

- based on the 2024 network from 2025 FTIP analysis
- removed any highway projects that were not completed by 2023
- reviewed and updated link attributes, e.g., freeflow speed, facility type, area type, ..., as needed
- reviewed and updated distance on gateway links for SB743 VMT calculation

3. 2023 TRANSIT NETWORK

The 2024 transit network from 2025 FTIP analysis was used as the 2023 transit network since there were no changes between 2023 and 2024.

4. AUTO OPERATING COST

The auto operating costs in the model were provided by CARB in 2010\$.

5. OTHER EXTERNAL TRIP TABLES

Other 2023 external trip tables, such as, internal-external/external-internal/external-external trips and external truck trips, were developed by applying annual growth rates estimated based on UOP socioeconomic projections to 2019 external trip tables.

2023 MODEL VALIDATION

The 2026 RTP/SCS model was calibrated so that the 2023 VMT is within $\pm 3\%$ of the HPMS VMT.

Table 5. 2023 StanCOG VMT in HPMS Report

2023 Miles, Lane-Miles and Daily Vehicle Miles of Travel by Metropolitan Planning Organization			
MPO	Miles	Lane Miles	DVMT (thousands)
AMBAG	4,267.02	10,967.36	17,461.47
BCAG	2,079.08	5,096.79	4,351.56
FCOG	7,388.21	18,405.14	23,239.90
KCAG	1,841.37	4,616.22	4,442.00
KCOG	7,552.10	19,395.46	25,440.80
MCAG	2,717.37	6,915.66	7,824.26
MCTC	2,704.79	6,251.78	5,317.06
MTC	21,916.85	58,616.12	148,756.58
SACOG	12,774.43	31,967.56	55,435.10
SANDAG	8,818.77	24,230.46	74,421.61
SBCAG	2,158.57	5,804.67	9,336.16
SCAG	55,970.20	152,817.47	405,248.23
SJCOG	3,553.97	9,308.03	18,327.35
SLOCOG	2,651.31	6,833.39	8,744.34
SRTA	2,505.45	6,492.52	4,952.73
STANCOG	3,061.14	8,139.94	11,921.87
TCAG	5,404.26	13,214.84	11,645.73
TRPA	522.31	1,174.73	836.66
Not in any MPO	29,688.46	68,617.77	32,970.54
STATEWIDE TOTAL	177,575.67	458,865.93	870,673.95

The calibrated 2023 daily VMT was around 11.6 million, which is within $\pm 3\%$ of the HPMS VMT.

Trip Assignment – 2023 VMT vs Model (STANCOG)			
Evaluation Criterion	HPMS	Model	% Deviation
+/-3%	11,921,870	11,568,174	-2.97%

Notes: Daily Vehicle Miles Traveled. Highway Performance Management System – 2023 California Public Road Data, Table 9

The AM/PM peak period assigned volumes were compared to demand data from REPLICA for validation. The validation result meets all criteria.

Validation Metric	Thresholds	AM Period	PM Period
(Model-Count)/Count Ratio	< 10%	1.3%	-2.4%
% of Total Links within Caltrans Max Deviations	> 75%	85%	86%
% RMSE	< 40%	33%	32%
Correlation Coefficient	> 0.88	0.96	0.95

Appendix F

Greenhouse Gas Emission
Calculations

StanCOG 2026 RTP/SCS

Greenhouse Gas Emissions

Table 4.9-1 **Proposed 2026 RTP/SCS Total Daily VMT Data**

Year	Daily VMT
2005 Baseline	9,129,097
2023 Baseline	11,736,343
2030 with Proposed 2026 RTP/SCS	11,949,978
2035 with Proposed 2026 RTP/SCS	12,249,388
2045 with Proposed 2026 RTP/SCS	12,686,997
2049 with Proposed 2026 RTP/SCS	13,012,130

Table 4.9-2 **Proposed 2026 RTP/SCS Net Change in Transportation-Related Emissions (2025-2049)**

Scenario	Total Emissions	Per Capita Emissions
	(MT of CO ₂ e/year)	(MT of CO ₂ e/person/year) ¹
Existing (2023)	2,032,339	3.7
2049 with Proposed 2026 RTP/SCS	1,590,590	2.6
Net Change from 2025 Baseline	-441,749	-1.0
Threshold of Significance	> 0	> 0
Threshold Exceeded?	No	No

() denotes a negative number.

MT = metric tons; CO₂e = carbon dioxide equivalent

Population
551,297
602,220

Table 4.9-3 Per Capita Passenger Vehicle CO₂ Emissions Comparison

	Percent Change in Per Capita CO ₂ Emissions (lbs/day)		
	2005 Baseline	2035	2049
	(per SB 375)		
Per Capita Passenger Vehicle Emissions ¹	15.47	12.14	10.17
Percent Change from in Per Capita GHG Emissions from 2005		-21.55%	-34.24%
SB 375 Target		-16%	n/a ²
SB 375 Target Met?		Yes	n/a ²

CO₂ = carbon dioxide; lbs = pounds; SB = Senate Bill

¹Per capita passenger vehicle emissions for 2035 and 2049 derived from reduction percentages provided by StanCOG

²SB 375 targets have not been adopted for post-2035 years.

Table 4.9-4 Per Capita Transportation-Related Emissions (All Vehicle Classes) Compared to 1990 Levels

Scenario	Per Capita CO ₂ Emissions (lbs/day)	
	Vehicle Emissions	% Change in Emissions
		Compared to 1990 Baseline
1990 Baseline ¹	18.2	—
2005 Baseline	21.4	—
Existing (2023)	22.3	22%
2030 with proposed 2026 RTP/SCS ³	15.6	-14%
2049 with proposed 2026 RTP/SCS	16.0	-12%

¹ Actual 1990 emissions are unknown but are generally assumed to be 15% below 2005 levels (CARB 2008).

Table 4.9-5 **2030 and 2045 GHG Emissions Compared to 1990 Levels**

Scenario	CO ₂ e Emissions (MT/year)	% Difference in Emissions Compared to 1990 Baseline
1990 Baseline ¹	1,116,462	--
2030 with 2049 RTP/SCS	1,134,307	2%
2045 with 2049 RTP/SCS	1,013,163	-9%

¹ 1990 Baseline from the 2022 RTP/SCS.

CO₂ = carbon dioxide; MT = metric ton

StanCOG 2026 RTP/SCS Vehicle Miles Traveled by Scenario

Year	Total Daily VMT
2005 Baseline (SB 375 Baseline)	9,129,097
2023 Baseline	11,736,343
2030 with Proposed 2026 RTP/SCS	11,949,978
2045 with Proposed 2026 RTP/SCS	12,249,388
2049 No Project	12,686,997
2049 with Proposed 2026 RTP/SCS	13,012,130

Appendix G

Tribal Consultation



1111 I Street, Ste 308
Modesto, CA 95354
209.525.4600 Main
209.558.7833 Fax
www.stancog.org

April 7, 2025

Member Agencies

City of Ceres

Timothy Perez, Tribal Compliance Officer, Northern Valley Yokut / Ohlone Tribe
PO Box 717

City of Hughson

Linden, CA 95236

City of Modesto

RE: AB 52 Consultation, Stanislaus Council of Governments 2026 Regional Transportation Plan/Sustainable Communities Strategy Project, Stanislaus County, California

City of Newman

City of Oakdale

Dear Timothy:

City of Patterson

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City of Riverbank

City of Turlock

City of Waterford

Stanislaus County

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Policy Board Chair

Buck Condit

Policy Board Vice-Chair

George Carr

Executive Director

Rosa De León Park

Assembly Bill 52 (AB 52) established a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources. The proposed project must comply with California Public Resources Code § 21080.3.1, which requires local governments to conduct meaningful consultation with California

Timothy Perez
April 7, 2025

Native American tribes that have requested, in writing, to be notified by lead agencies of proposed projects in the geographic area with which the tribe is traditionally and culturally affiliated. The Tribe must respond in writing within 30 days of this AB 52 notice. The Native American Heritage Commission (NAHC) provided a list of Native American groups and individuals who have knowledge of the religious and/or cultural significance of resources that may be located in the Stanislaus Region, and your contact information was included on their list.

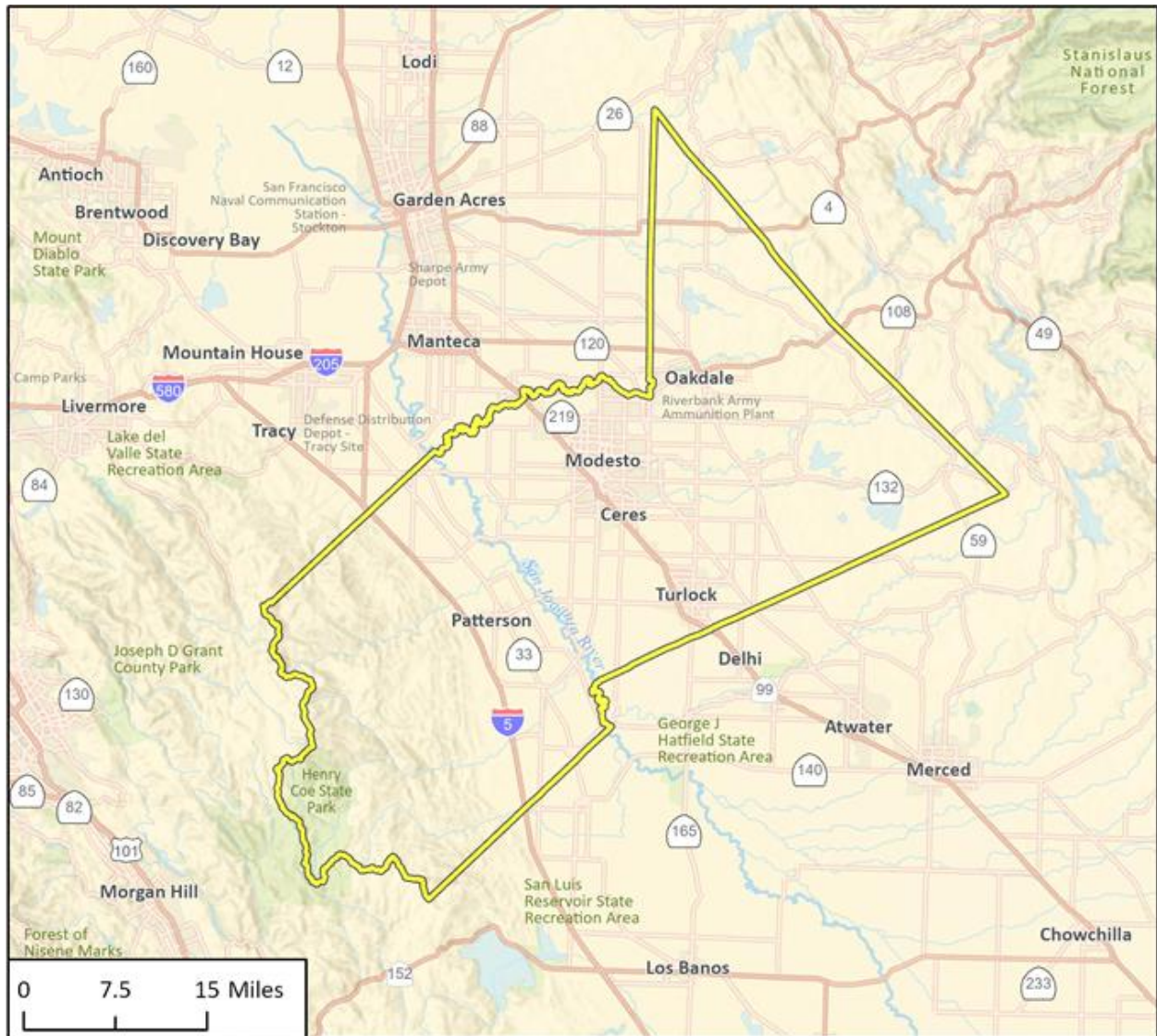
The input of the Northern Valley Yokut / Ohlone Tribe is important to the Stanislaus Council of Governments' planning process. Under AB 52, you have 30 days from receipt of this letter to respond in writing if you wish to consult on the proposed project. If you require any additional information or have any questions, please contact Nick St Cook, Associate Planner, at (209) 525-4639 or via e-mail at nstcook@stancog.org. Thank you for your assistance.

Sincerely,

Elisabeth Hahn
Deputy Executive Director of Planning

Enclosure: Project Location Map

Timothy Perez
April 7, 2025
Project Location Map





1111 I Street, Ste 308
Modesto, CA 95354
209.525.4600 Main
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April 7, 2025

Member Agencies

City of Ceres

Charlene Nijmeh, Chairperson, Muwekma Ohlone Indian Tribe of the SF Bay Area
1169 S. Main Street, Ste. 336

City of Hughson

Manteca, CA, 95377

City of Modesto

RE: AB 52 Consultation, Stanislaus Council of Governments 2026 Regional Transportation Plan/Sustainable Communities Strategy Project, Stanislaus County, California

City of Newman

City of Oakdale

Dear Charlene:

City of Patterson

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City of Waterford

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Policy Board Vice-Chair

George Carr

Executive Director

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Charlene Nijmeh
April 7, 2025

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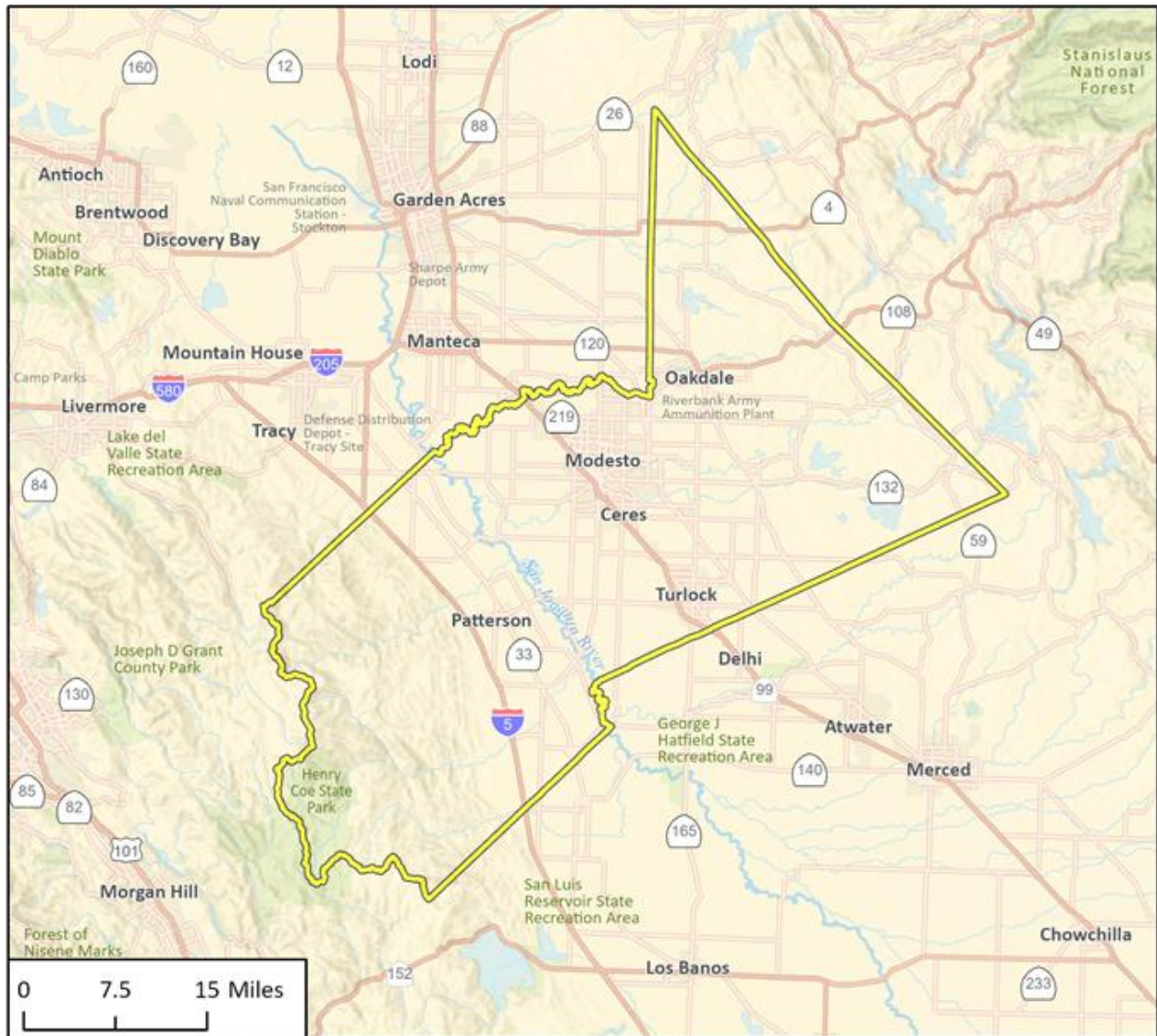
The input of the Muwekma Ohlone Indian Tribe of the SF Bay Area is important to the Stanislaus Council of Governments' planning process. Under AB 52, you have 30 days from receipt of this letter to respond in writing if you wish to consult on the proposed project. If you require any additional information or have any questions, please contact Nick St Cook, Associate Planner, at (209) 525-4639 or via e-mail at nstcook@stancog.org. Thank you for your assistance.

Sincerely,

Elisabeth Hahn
Deputy Executive Director of Planning

Enclosure: Project Location Map

Charlene Nijmeh
April 7, 2025
Project Location Map





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Modesto, CA 95354
209.525.4600 Main
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April 7, 2025

Member Agencies

City of Ceres

Sandra Chapman, Chairperson, Southern Sierra Miwuk Nation

P.O. Box 186

City of Hughson

Mariposa, CA, 95338

City of Modesto

RE: AB 52 Consultation, Stanislaus Council of Governments 2026 Regional Transportation Plan/Sustainable Communities Strategy Project, Stanislaus County, California

City of Newman

City of Oakdale

Dear Sandra:

City of Patterson

The Stanislaus Council of Governments (StanCOG) is preparing an Environmental Impact Report (EIR) for StanCOG's 2026 Regional Transportation Plan/Sustainable Communities Strategy Project (RTP/SCS). StanCOG, as the lead agency under the California Environmental Quality Act (CEQA), is reaching out to you and other tribal entity points of contact identified by the State of California Native American Heritage Commission's contact list.

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George Carr

Executive Director

Rosa De León Park

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Sandra Chapman
April 7, 2025

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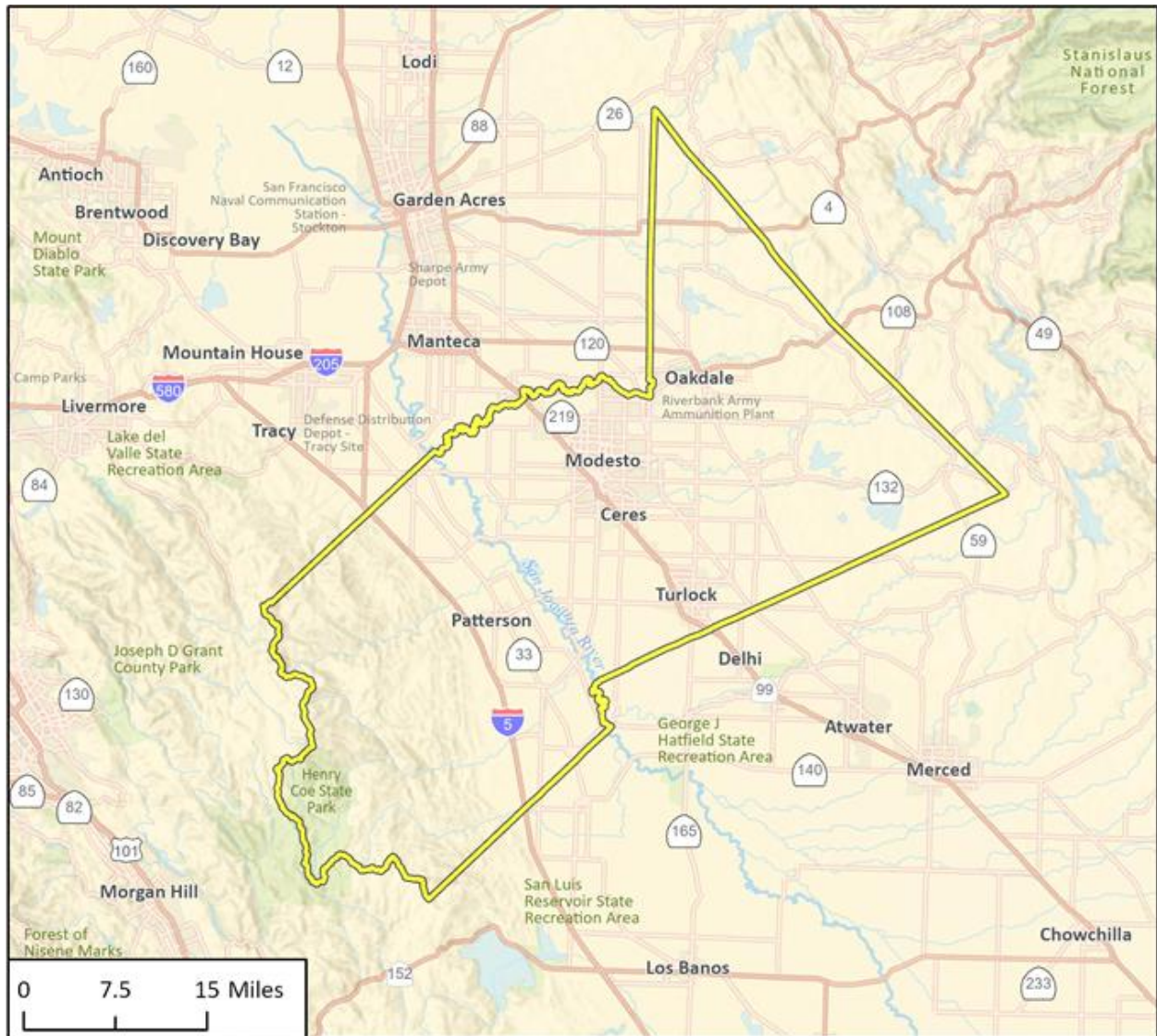
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Sincerely,

Elisabeth Hahn
Deputy Executive Director of Planning

Enclosure: Project Location Map

Sandra Chapman
April 7, 2025
Project Location Map



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24-15018 EPS
Fig 3 Regional Location





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April 7, 2025

Member Agencies

City of Ceres

Kenneth Woodrow, Chairperson, Wuksache Indian Tribe/Eshom Valley Band
1179 Rock Haven Ct.
Salinas, CA 93906

City of Hughson

City of Modesto

City of Newman

RE: AB 52 Consultation, Stanislaus Council of Governments 2026 Regional Transportation Plan/Sustainable Communities Strategy Project, Stanislaus County, California

City of Oakdale

Dear Kenneth:

City of Patterson

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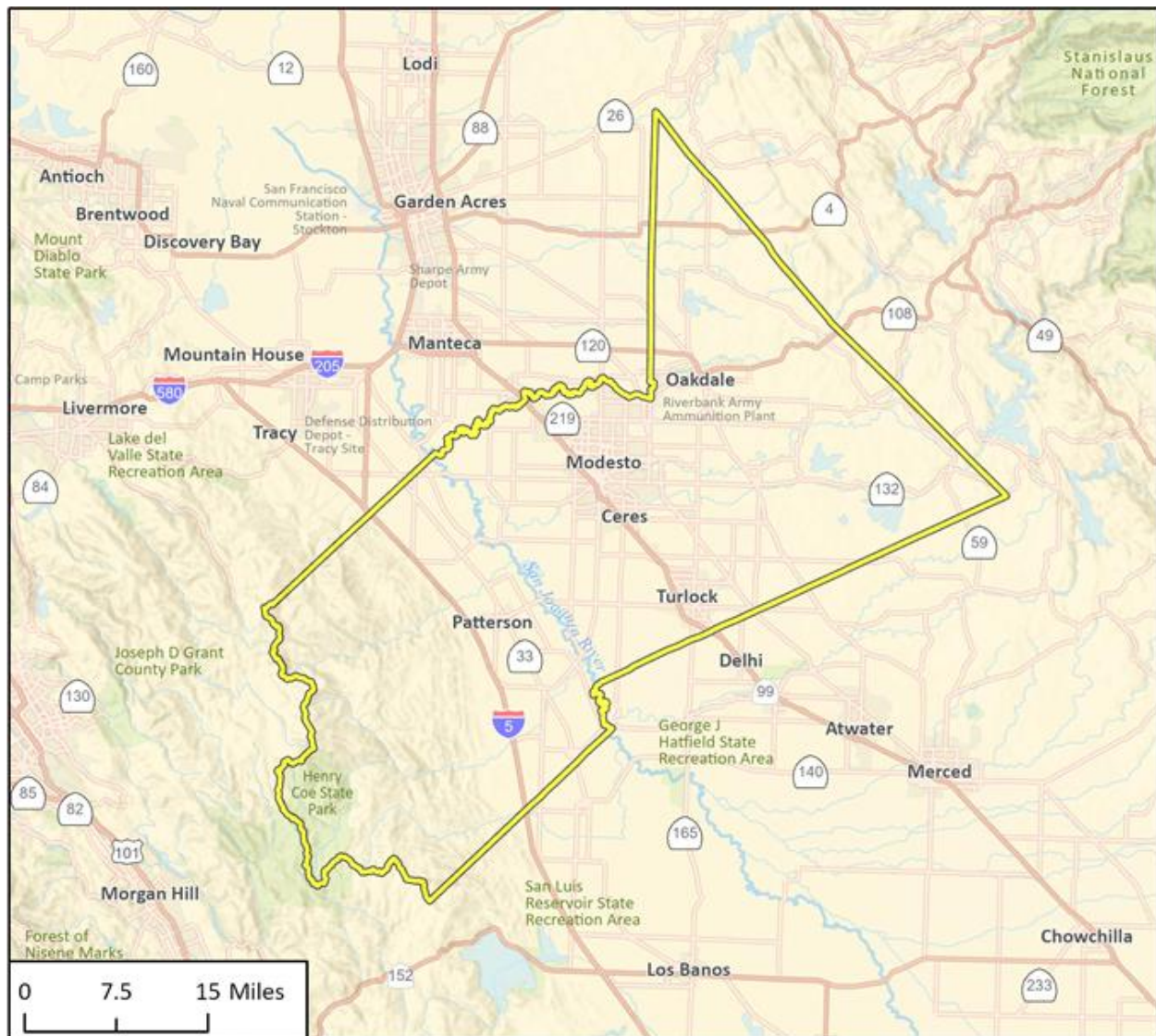
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Sincerely,

Elisabeth Hahn
Deputy Executive Director of Planning

Enclosure: Project Location Map

Kenneth Woodrow
April 7, 2025
Project Location Map



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24-15018 EPS
Fig 3 Regional Location





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April 7, 2025

Member Agencies

City of Ceres

Michelle St. Clair, Executive Director of Cultural Preservation, Wilton Rancheria
9728 Kent Street

City of Hughson

Elk Grove, CA 95624

City of Modesto

RE: AB 52 Consultation, Stanislaus Council of Governments 2026 Regional Transportation Plan/Sustainable Communities Strategy Project, Stanislaus County, California

City of Newman

City of Oakdale

Dear Michelle:

City of Patterson

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Executive Director

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Michelle St. Clair
April 7, 2025

meaningful consultation with California Native American tribes that have requested, in writing, to be notified by lead agencies of proposed projects in the geographic area with which the tribe is traditionally and culturally affiliated. The Tribe must respond in writing within 30 days of the City's AB 52 notice. The Native American Heritage Commission (NAHC) provided a list of Native American groups and individuals who have knowledge of the religious and/or cultural significance of resources that may be located in the Stanislaus Region, and your contact information was included on their list.

The input of the Wilton Rancheria is important to the Stanislaus Council of Governments' planning process. Under AB 52, you have 30 days from receipt of this letter to respond in writing if you wish to consult on the proposed project. If you require any additional information or have any questions, please contact Nick St Cook, Associate Planner, at (209) 525-4639 or via e-mail at nstcook@stancog.org. Thank you for your assistance.

Sincerely,

Elisabeth Hahn
Deputy Executive Director of Planning

Enclosure: Project Location Map

Project Location Map

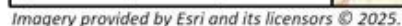
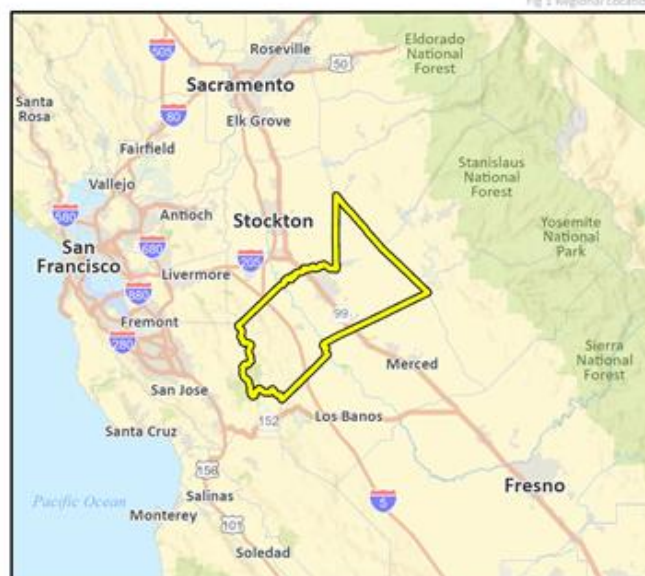


Fig. 2 Regional Location





1111 I Street, Ste 308
Modesto, CA 95354
209.525.4600 Main
209.558.7833 Fax
www.stancog.org

April 7, 2025

Member Agencies

City of Ceres

City of Hughson

City of Modesto

City of Newman

City of Oakdale

City of Patterson

City of Riverbank

City of Turlock

City of Waterford

Stanislaus County

Policy Board Chair

Buck Condit

Policy Board Vice-Chair

George Carr

Executive Director

Rosa De León Park

Cultural Preservation Department, Wilton Rancheria
9728 Kent Street
Elk Grove, CA 95624

RE: AB 52 Consultation, Stanislaus Council of Governments 2026 Regional Transportation Plan/Sustainable Communities Strategy Project, Stanislaus County, California

Dear Cultural Preservation Department:

The Stanislaus Council of Governments (StanCOG) is preparing an Environmental Impact Report (EIR) for StanCOG's 2026 Regional Transportation Plan/Sustainable Communities Strategy Project (RTP/SCS). StanCOG, as the lead agency under the California Environmental Quality Act (CEQA), is reaching out to you and other tribal entity points of contact identified by the State of California Native American Heritage Commission's contact list.

The proposed project consists of both a long-range Regional Transportation Plan and a Sustainable Communities Strategy. The RTP is a long-term assessment of a region's transportation assets and a framework for expanding and maintaining those assets, guiding the development, enhancement, and management of the regional transportation network. The 2026 RTP will have a horizon year of 2049. The SCS is a strategy for demonstrating how the region will meet the greenhouse gas emission targets by integrating transportation, land use and housing in the planning process. The RTP/SCS addresses all forms or modes of transportation, including highways, streets and roads, transit, rail, bicycle and pedestrian, and aviation. The 2026 comprehensive update of the RTP/SCS will identify transportation facilities and programs that will be needed to meet travel demands through 2049. The proposed project is subject to the California Environmental Quality Act and will be analyzed at the programmatic level. Because this is a programmatic document intended to guide future transportation work in the StanCOG region, no specific individual facility or project will be analyzed in the EIR.

Assembly Bill 52 (AB 52) established a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources. The proposed project must comply with California Public Resources Code § 21080.3.1, which requires local governments to conduct meaningful consultation with California

Cultural Preservation Department

April 7, 2025

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Sincerely,

Elisabeth Hahn
Deputy Executive Director of Planning

Enclosure: Project Location Map

Project Location Map

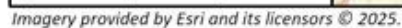
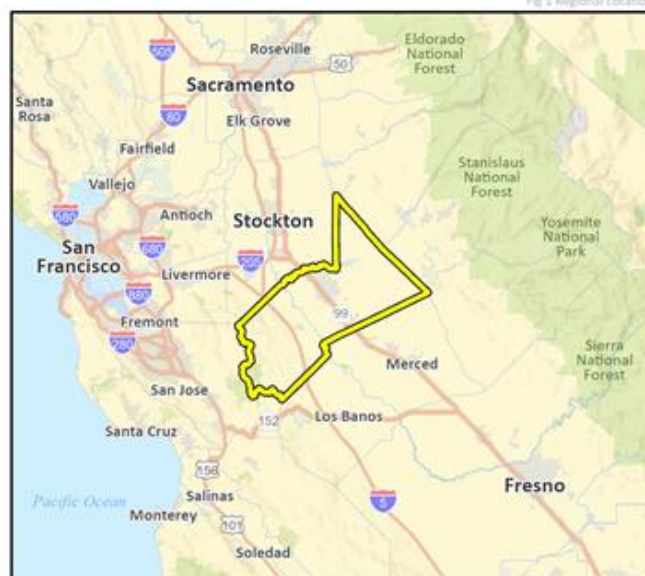


Fig 2 Regional Location





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April 7, 2025

Member Agencies

City of Ceres

Ed Ketchum, Vice-Chairperson, Amah Mutsun Tribal Band

P.O. Box 5272

City of Hughson

Galt, CA, 95632

City of Modesto

RE: AB 52 Consultation, Stanislaus Council of Governments 2026 Regional Transportation Plan/Sustainable Communities Strategy Project, Stanislaus County, California

City of Newman

City of Oakdale

Dear Ed:

City of Patterson

The Stanislaus Council of Governments (StanCOG) is preparing an Environmental Impact Report (EIR) for StanCOG's 2026 Regional Transportation Plan/Sustainable Communities Strategy Project (RTP/SCS). StanCOG, as the lead agency under the California Environmental Quality Act (CEQA), is reaching out to you and other tribal entity points of contact identified by the State of California Native American Heritage Commission's contact list.

City of Riverbank

City of Turlock

City of Waterford

Stanislaus County

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Policy Board Chair

Buck Condit

Policy Board Vice-Chair

George Carr

Executive Director

Rosa De León Park

Assembly Bill 52 (AB 52) established a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources. The proposed project must comply with California Public Resources Code § 21080.3.1, which requires local governments to conduct meaningful consultation with California

Ed Ketchum
April 7, 2025

Native American tribes that have requested, in writing, to be notified by lead agencies of proposed projects in the geographic area with which the tribe is traditionally and culturally affiliated. The Tribe must respond in writing within 30 days of this AB 52 notice. The Native American Heritage Commission (NAHC) provided a list of Native American groups and individuals who have knowledge of the religious and/or cultural significance of resources that may be located in the Stanislaus Region, and your contact information was included on their list.

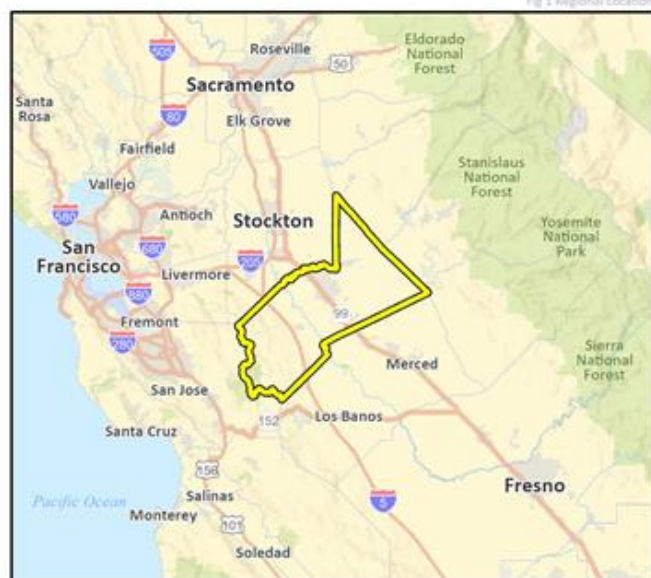
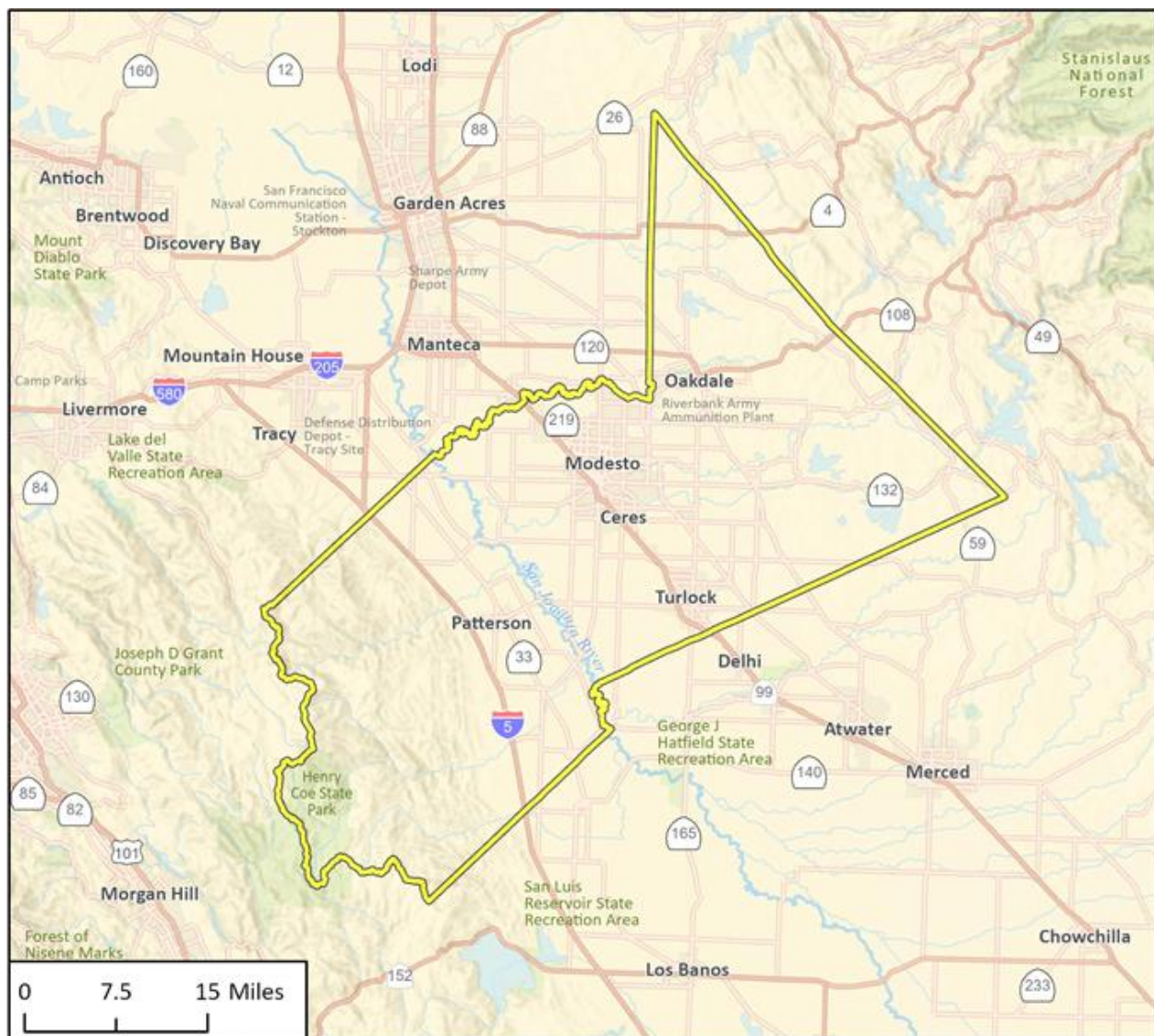
The input of the Amah Mutsun Tribal Band is important to the Stanislaus Council of Governments' planning process. Under AB 52, you have 30 days from receipt of this letter to respond in writing if you wish to consult on the proposed project. If you require any additional information or have any questions, please contact Nick St Cook, Associate Planner, at (209) 525-4639 or via e-mail at nstcook@stancog.org. Thank you for your assistance.

Sincerely,

Elisabeth Hahn
Deputy Executive Director of Planning

Enclosure: Project Location Map

Ed Ketchum
April 7, 2025





1111 I Street, Ste 308
Modesto, CA 95354
209.525.4600 Main
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www.stancog.org

April 7, 2025

Member Agencies

City of Ceres

Katherine Perez, Chairperson, Northern Valley Yokut / Ohlone Tribe
PO Box 717

City of Hughson

Linden, CA 95236

City of Modesto

RE: AB 52 Consultation, Stanislaus Council of Governments 2026 Regional Transportation Plan/Sustainable Communities Strategy Project, Stanislaus County, California

City of Newman

City of Oakdale

Dear Katherine:

City of Patterson

The Stanislaus Council of Governments (StanCOG) is preparing an Environmental Impact Report (EIR) for StanCOG's 2026 Regional Transportation Plan/Sustainable Communities Strategy Project (RTP/SCS). StanCOG, as the lead agency under the California Environmental Quality Act (CEQA), is reaching out to you and other tribal entity points of contact identified by the State of California Native American Heritage Commission's contact list.

City of Riverbank

City of Turlock

City of Waterford

Stanislaus County

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Policy Board Chair

Buck Condit

Policy Board Vice-Chair

George Carr

Executive Director

Rosa De León Park

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Katherine Perez
April 7, 2025

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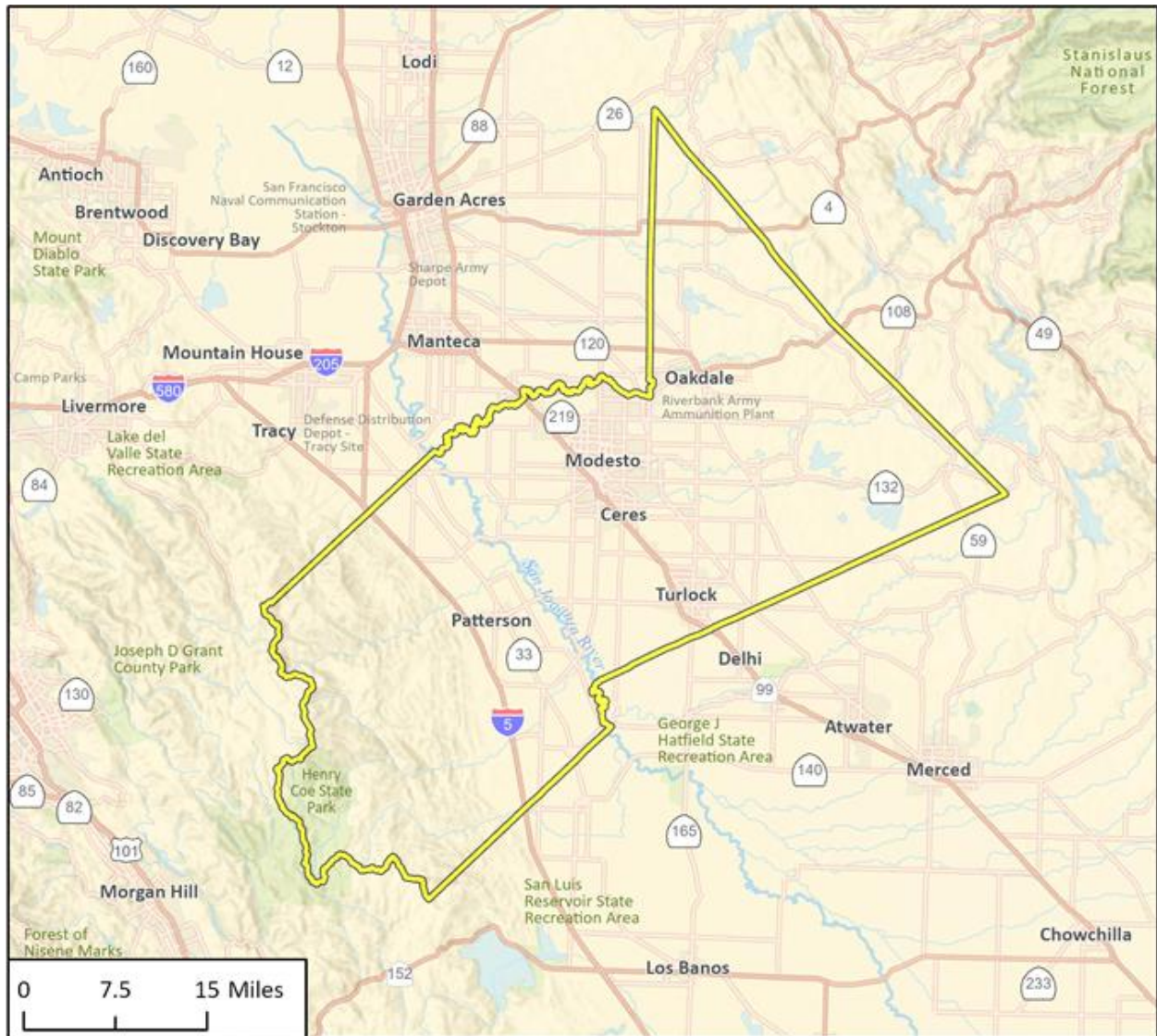
The input of the Northern Valley Yokut / Ohlone Tribe is important to the Stanislaus Council of Governments' planning process. Under AB 52, you have 30 days from receipt of this letter to respond in writing if you wish to consult on the proposed project. If you require any additional information or have any questions, please contact Nick St Cook, Associate Planner, at (209) 525-4639 or via e-mail at nstcook@stancog.org. Thank you for your assistance.

Sincerely,

Elisabeth Hahn
Deputy Executive Director of Planning

Enclosure: Project Location Map

Katherine Perez
April 7, 2025
Project Location Map



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24-15018 EPS
Fig 3 Regional Location





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www.stancog.org

April 7, 2025

Member Agencies

City of Ceres

Valentin Lopez, Chairperson, Amah Mutsun Tribal Band

P.O. Box 5272

City of Hughson

Galt, CA, 95632

City of Modesto

RE: AB 52 Consultation, Stanislaus Council of Governments 2026 Regional Transportation Plan/Sustainable Communities Strategy Project, Stanislaus County, California

City of Newman

City of Oakdale

Dear Valentin:

City of Patterson

The Stanislaus Council of Governments (StanCOG) is preparing an Environmental Impact Report (EIR) for StanCOG's 2026 Regional Transportation Plan/Sustainable Communities Strategy Project (RTP/SCS). StanCOG, as the lead agency under the California Environmental Quality Act (CEQA), is reaching out to you and other tribal entity points of contact identified by the State of California Native American Heritage Commission's contact list.

City of Riverbank

City of Turlock

City of Waterford

Stanislaus County

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Policy Board Chair

Buck Condit

Policy Board

Vice-Chair

George Carr

Executive Director

Rosa De León Park

Assembly Bill 52 (AB 52) established a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources. The proposed project must comply with California Public Resources Code § 21080.3.1, which requires local governments to conduct meaningful consultation with California

Valentin Lopez
April 7, 2025

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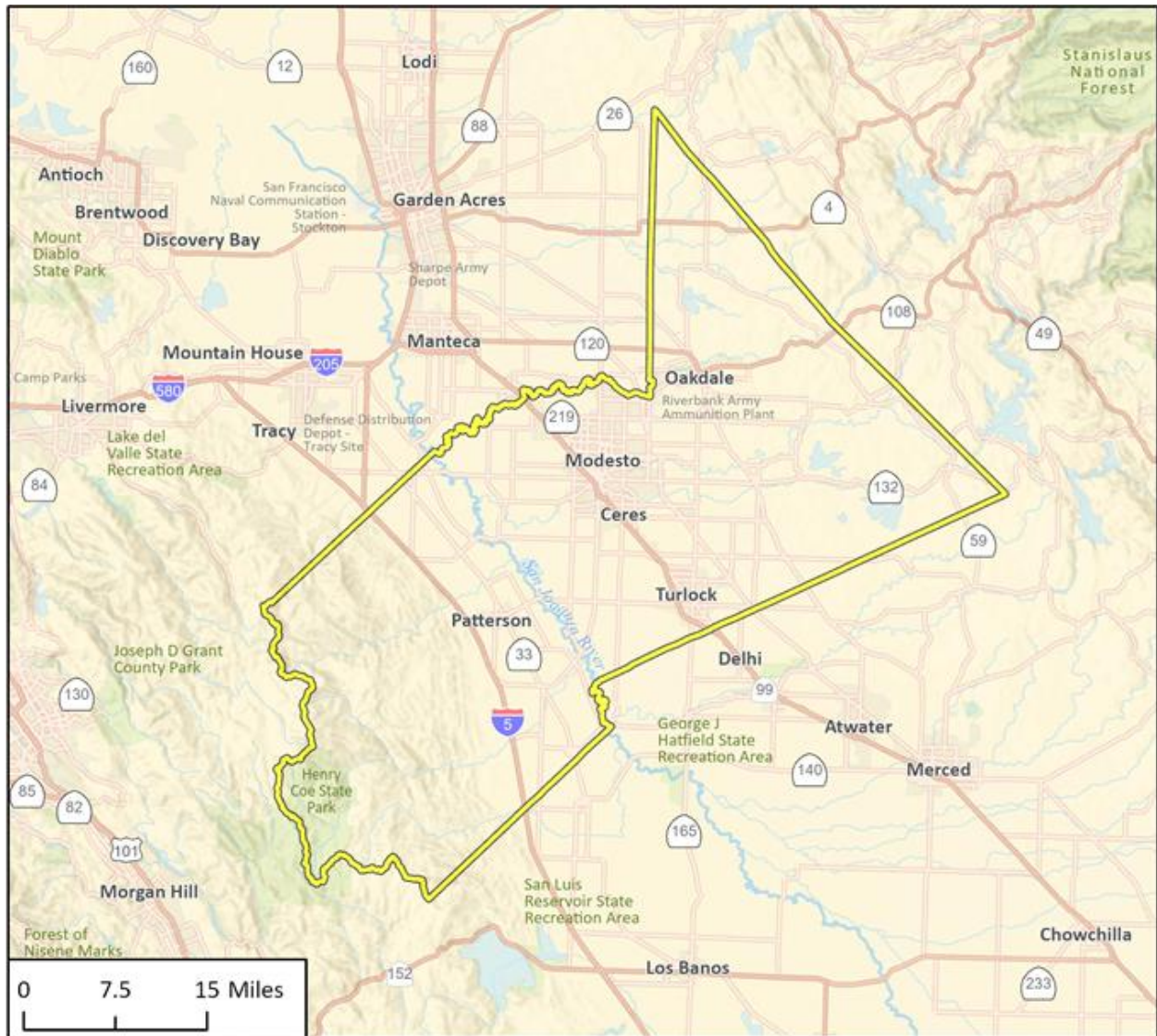
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Sincerely,

Elisabeth Hahn
Deputy Executive Director of Planning

Enclosure: Project Location Map

Valentin Lopez
April 7, 2025
Project Location Map



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24-15018 EPS
Fig 3 Regional Location



July 7, 2026

Member Agencies

City of Ceres

City of Hughson

City of Modesto

City of Newman

City of Oakdale

City of Patterson

City of Riverbank

City of Turlock

City of Waterford

Stanislaus County

Policy Board Chair

Buck Condit

Policy Board Vice-Chair

George Carr

Executive Director

Rosa De León Park

Jazzmyn Gegere, Director of Cultural Resource Preservation, Southern Sierra Miwuk Nation

P.O. Box 186
Mariposa, CA, 95338

RE: AB 52 Consultation, Stanislaus Council of Governments 2026 Regional Transportation Plan/Sustainable Communities Strategy Project, Stanislaus County, California

Dear Jazzmyn:

The Stanislaus Council of Governments (StanCOG) is preparing an Environmental Impact Report (EIR) for StanCOG's 2026 Regional Transportation Plan/Sustainable Communities Strategy Project (RTP/SCS). StanCOG, as the lead agency under the California Environmental Quality Act (CEQA), is reaching out to you and other tribal entity points of contact identified by the State of California Native American Heritage Commission's contact list.

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Assembly Bill 52 (AB 52) established a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources. The proposed project must comply with California Public Resources Code § 21080.3.1,

Jazzmyn Gegere
April 7, 2025

which requires local governments to conduct meaningful consultation with California Native American tribes that have requested, in writing, to be notified by lead agencies of proposed projects in the geographic area with which the tribe is traditionally and culturally affiliated. The Tribe must respond in writing within 30 days of this AB 52 notice. The Native American Heritage Commission (NAHC) provided a list of Native American groups and individuals who have knowledge of the religious and/or cultural significance of resources that may be located in the Stanislaus Region, and your contact information was included on their list.

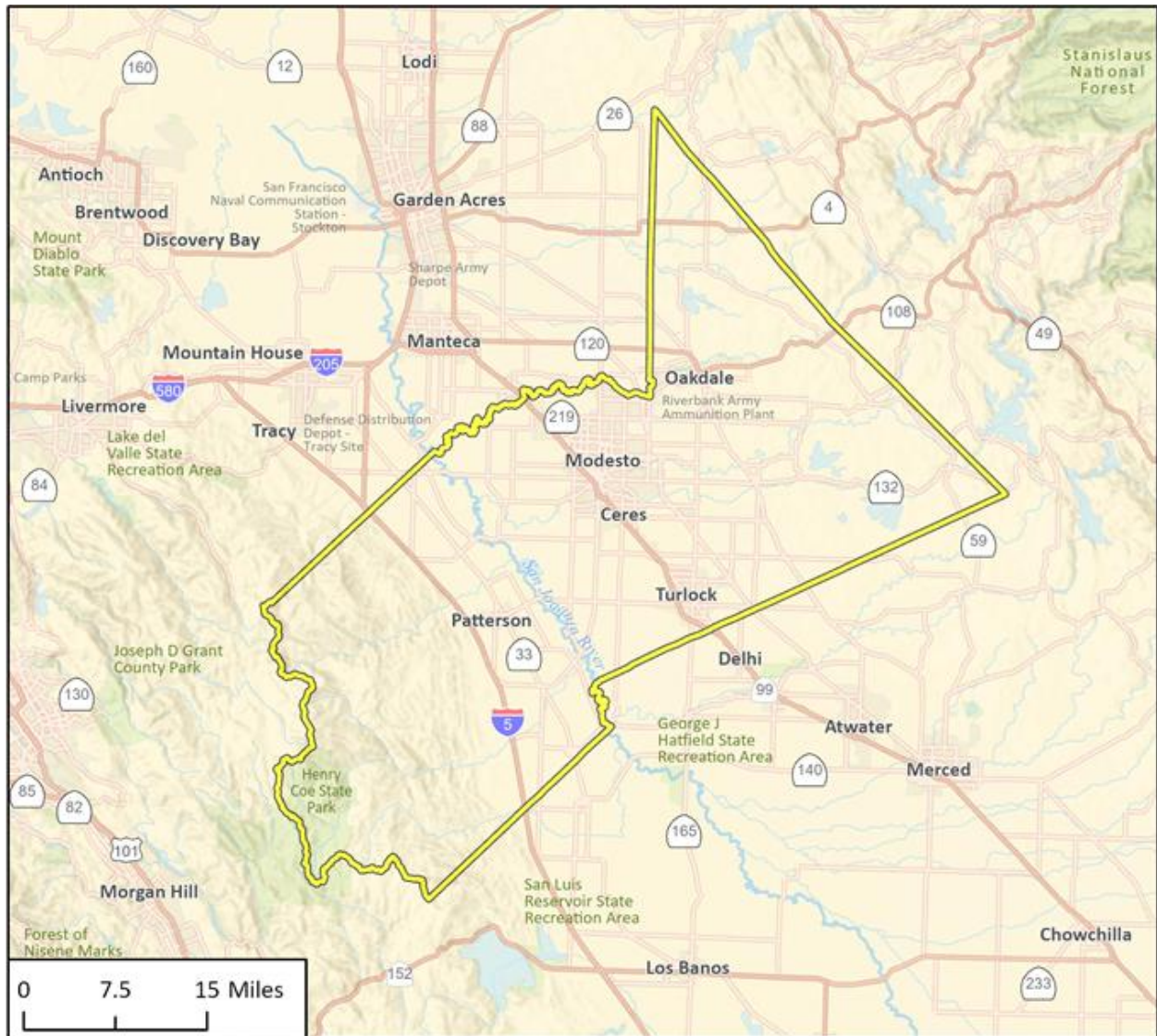
The input of the Southern Sierra Miwuk Nation is important to the Stanislaus Council of Governments' planning process. Under AB 52, you have 30 days from receipt of this letter to respond in writing if you wish to consult on the proposed project. If you require any additional information or have any questions, please contact Nick St Cook, Associate Planner, at (209) 525-4639 or via e-mail at nstcook@stancog.org. Thank you for your assistance.

Sincerely,

Elisabeth Hahn
Deputy Executive Director of Planning

Enclosure: Project Location Map

Jazzmyn Gegere
April 7, 2025
Project Location Map



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24-15018 EPS
Fig 3 Regional Location





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April 7, 2025

Member Agencies

City of Ceres

Neil Peyron, Chairperson, Tule River Indian Tribe
PO Box 589

City of Hughson

Porterville, CA 93258

City of Modesto

RE: AB 52 Consultation, Stanislaus Council of Governments 2026 Regional Transportation Plan/Sustainable Communities Strategy Project, Stanislaus County, California

City of Newman

City of Oakdale

Dear Neil:

City of Patterson

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City of Riverbank

City of Turlock

City of Waterford

Stanislaus County

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Policy Board Chair

Buck Condit

Policy Board Vice-Chair

George Carr

Executive Director

Rosa De León Park

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Neil Peyron
April 7, 2025

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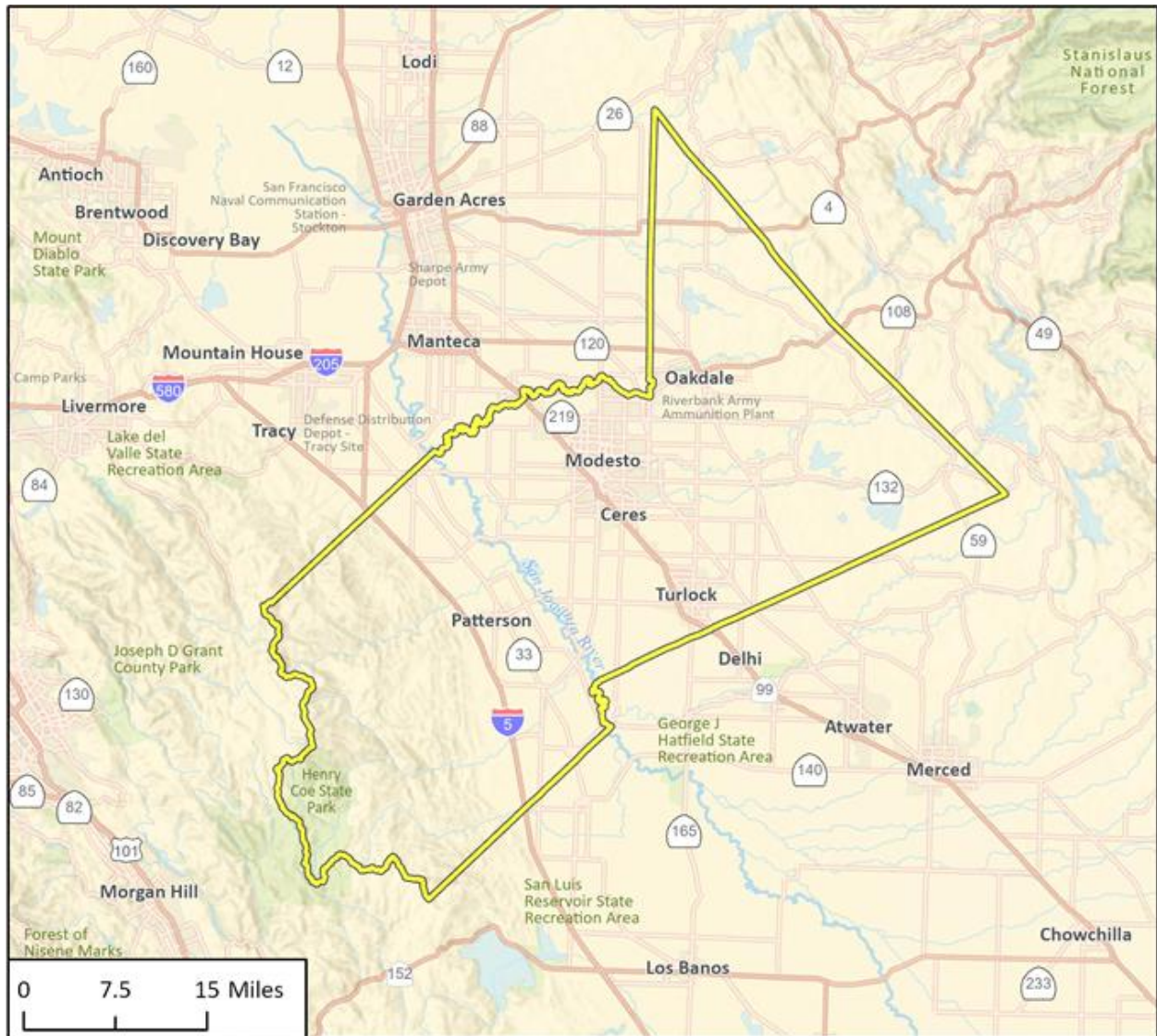
The input of the Tule River Indian Tribe is important to the Stanislaus Council of Governments' planning process. Under AB 52, you have 30 days from receipt of this letter to respond in writing if you wish to consult on the proposed project. If you require any additional information or have any questions, please contact Nick St Cook, Associate Planner, at (209) 525-4639 or via e-mail at nstcook@stancog.org. Thank you for your assistance.

Sincerely,

Elisabeth Hahn
Deputy Executive Director of Planning

Enclosure: Project Location Map

Neil Peyron
April 7, 2025
Project Location Map



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24-15018 EPS
Fig 3 Regional Location





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209.558.7833 Fax
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April 7, 2025

Member Agencies

City of Ceres

City of Hughson

City of Modesto

City of Newman

City of Oakdale

City of Patterson

City of Riverbank

City of Turlock

City of Waterford

Stanislaus County

Richard Massiatt, Councilmember/MLD Tribal Rep., Muwekma Ohlone Indian Tribe of the SF Bay Area

1169 S. Main Street, Ste. 336
Manteca, CA, 95377

RE: AB 52 Consultation, Stanislaus Council of Governments 2026 Regional Transportation Plan/Sustainable Communities Strategy Project, Stanislaus County, California

Dear Richard:

The Stanislaus Council of Governments (StanCOG) is preparing an Environmental Impact Report (EIR) for StanCOG's 2026 Regional Transportation Plan/Sustainable Communities Strategy Project (RTP/SCS). StanCOG, as the lead agency under the California Environmental Quality Act (CEQA), is reaching out to you and other tribal entity points of contact identified by the State of California Native American Heritage Commission's contact list.

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Policy Board Chair
Buck Condit

Policy Board Vice-Chair
George Carr

Executive Director
Rosa De León Park

Richard Massiatt
April 7, 2025

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The input of the Muwekma Ohlone Indian Tribe of the SF Bay Area is important to the Stanislaus Council of Governments' planning process. Under AB 52, you have 30 days from receipt of this letter to respond in writing if you wish to consult on the proposed project. If you require any additional information or have any questions, please contact Nick St Cook, Associate Planner, at (209) 525-4639 or via e-mail at nstcook@stancog.org. Thank you for your assistance.

Sincerely,

Elisabeth Hahn
Deputy Executive Director of Planning

Enclosure: Project Location Map

Project Location Map

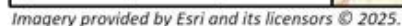
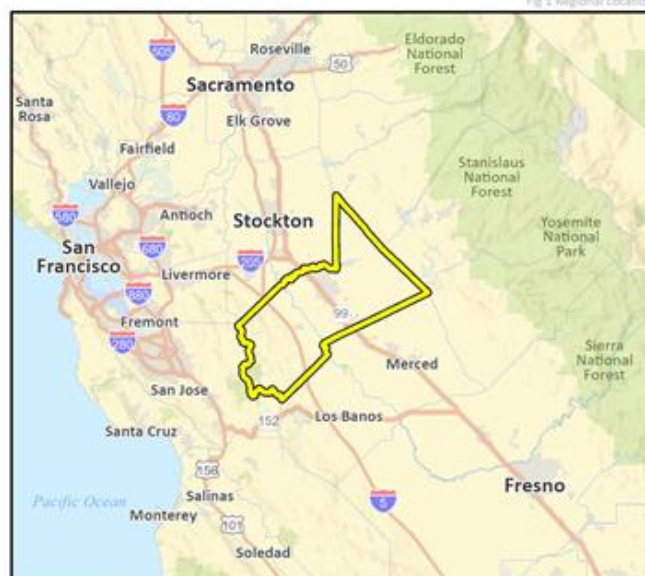


Fig. 2 Regional Location





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April 7, 2025

Member Agencies

City of Ceres

City of Hughson

City of Modesto

City of Newman

City of Oakdale

City of Patterson

City of Riverbank

City of Turlock

City of Waterford

Stanislaus County

Policy Board Chair

Buck Condit

Policy Board Vice-Chair

George Carr

Executive Director

Rosa De León Park

Steven Hutchason, THPO, Wilton Rancheria
9728 Kent Street
Elk Grove, CA 95624

RE: AB 52 Consultation, Stanislaus Council of Governments 2026 Regional Transportation Plan/Sustainable Communities Strategy Project, Stanislaus County, California

Dear Steven:

The Stanislaus Council of Governments (StanCOG) is preparing an Environmental Impact Report (EIR) for StanCOG's 2026 Regional Transportation Plan/Sustainable Communities Strategy Project (RTP/SCS). StanCOG, as the lead agency under the California Environmental Quality Act (CEQA), is reaching out to you and other tribal entity points of contact identified by the State of California Native American Heritage Commission's contact list.

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Steven Hutchason
April 7, 2025

Native American tribes that have requested, in writing, to be notified by lead agencies of proposed projects in the geographic area with which the tribe is traditionally and culturally affiliated. The Tribe must respond in writing within 30 days of this AB 52 notice. The Native American Heritage Commission (NAHC) provided a list of Native American groups and individuals who have knowledge of the religious and/or cultural significance of resources that may be located in the Stanislaus Region, and your contact information was included on their list.

The input of the Wilton Rancheria is important to the Stanislaus Council of Governments' planning process. Under AB 52, you have 30 days from receipt of this letter to respond in writing if you wish to consult on the proposed project. If you require any additional information or have any questions, please contact Nick St Cook, Associate Planner, at (209) 525-4639 or via e-mail at nstcook@stancog.org. Thank you for your assistance.

Sincerely,

Elisabeth Hahn
Deputy Executive Director of Planning

Enclosure: Project Location Map

Steven Hutchason
April 7, 2025
Project Location Map

