



2026 Regional Transportation Plan & Sustainable Communities Strategy

Final Environmental Impact Report

SCH #2025040852

prepared by

Stanislaus Council of Governments

1111 I Street, Suite 308

Modesto, California 95354

Contact: Nick St. Cook, Transportation Planner

prepared with the assistance of

Rincon Consultants, Inc.

4589 North Marty Avenue, Suite 102

Fresno, California 93722

September 2026

Table of Contents

1	Introduction.....	1-1
1.1	Final EIR Contents.....	1-1
1.2	Draft EIR Public Review Process.....	1-1
1.3	EIR Certification Process and Project Approval.....	1-1
1.4	Draft EIR Recirculation Not Required.....	1-2
2	Responses to Comments on the Draft EIR.....	2-1
2.1	Responses to Comments.....	2-1
3	Errata to the Draft EIR.....	3-1
3.1	Revisions to the Draft EIR.....	3-1
4	Mitigation Monitoring and Reporting Program.....	4-1

This page intentionally left blank.

1 Introduction

1.1 Final EIR Contents

This Final Environmental Impact Report (Final EIR) has been prepared by the Stanislaus Council of Governments (StanCOG) to evaluate the potential environmental impacts of the 2026 Regional Transportation Plan and Sustainable Communities Strategy ("Project").

As prescribed by the California Environmental Quality Act (CEQA) *Guidelines* Sections 15088 and 15132, the lead agency, StanCOG, is required to evaluate comments on environmental issues received from persons who have reviewed the Draft EIR and to prepare written responses to those comments. This document, together with the Draft EIR (incorporated by reference) comprise the Final EIR for this project. This Final EIR includes individual responses to each letter received during the public review period for the Draft EIR. In accordance with CEQA *Guidelines* Section 15088(c), the written responses describe the disposition of significant environmental issues raised. The Final EIR volume also includes minor revisions to the Draft EIR consisting of changes suggested by certain comments, as well as minor clarifications, corrections, or revisions to the Draft EIR. The Final EIR volume includes the following sections:

- Section 1: Introduction
- Section 2: Responses to Comments on the Draft EIR, which also includes a list of all commenters and public comment letters
- Section 3: Revisions to the Draft EIR
- Section 4: Mitigation Monitoring and Report Program

1.2 Draft EIR Public Review Process

StanCOG filed a notice of completion (NOC) with the Governor's Office of Planning and Research to begin the 45-day public review period (Public Resources Code [PRC] Section 21161), which began on July 10, 2026 and ended on August 24, 2026. StanCOG conducted public hearings on July 20, 2026, and August 19, 2026. No oral comments on the Draft EIR were received during either hearing. The Draft EIR was made available on the County's website (<https://stancog.org/187/Regional-Transportation-Plan-RTP>). As a result of these notification efforts, written comments on the content of the Draft EIR were received from two State and local agencies. Section 2, "Responses to Comments on the Draft EIR," identifies these commenting parties, their respective comments, and responses to these comments. None of the comments received, or the responses provided, constitute "significant new information" by CEQA standards (State CEQA Guidelines CCR Section 15088.5).

1.3 EIR Certification Process and Project Approval

Before adopting the proposed project, the lead agency is required to certify that the EIR has been completed in compliance with CEQA, that the decision-making body reviewed and considered the information in the EIR, and that the EIR reflects the independent judgment of the lead agency.

Upon certification of an EIR, the lead agency makes a decision on the project analyzed in the EIR. A lead agency may: (a) disapprove a project because of its significant environmental effects; (b) require changes to a project to reduce or avoid significant environmental effects; or (c) approve a project despite its significant environmental effects, if the proper findings and statement of overriding considerations are adopted (State CEQA Guidelines Sections 15042 and 15043).

In approving a project, for each significant impact of the project identified in the EIR, the lead or responsible agency must find, based on substantial evidence, that either: (a) the project has been changed to avoid or substantially reduce the magnitude of the impact; (b) changes to the project are within another agency's jurisdiction and such changes have or should be adopted; or (c) specific economic, social, or other considerations make the mitigation measures or project alternatives infeasible (State CEQA Guidelines Section 15091). Per PRC Section 21061.1, feasible means capable of being accomplished in a successful manner within a reasonable period of time, taking into account, economic, environmental, legal, social, and technological factors.

If an agency approves a project with unavoidable significant environmental effects, it must prepare a written Statement of Overriding Considerations that sets forth the specific social, economic, or other reasons supporting the agency's decision and explains why the project's benefits outweigh the significant environmental effects (State CEQA Guidelines Section 15093).

When an agency makes findings on significant effects identified in the EIR, it must adopt a reporting or monitoring program for mitigation measures that were adopted or made conditions of project approval to mitigate significant effects (State CEQA Guidelines Section 15091[d]).

1.4 Draft EIR Recirculation Not Required

CEQA Guidelines Section 15088.5 requires Draft EIR recirculation when comments on the Draft EIR or responses thereto identify "significant new information." Significant new information is defined as including:

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

The comments, responses, and Draft EIR amendments presented in this document do not constitute such "significant new information;" instead, they clarify, amplify, or make insignificant modifications to the Draft EIR. For example, none of the comments, responses, and Draft EIR amendments disclose new or substantially more severe significant environmental effects of the proposed project, or new feasible mitigation measures or alternatives considerably different than those analyzed in the Draft EIR that would clearly lessen the proposed project's significant effects.

2 Responses to Comments on the Draft EIR

This section includes comments received during public circulation of the Draft Environmental Impact Report (EIR) prepared for the Stanislaus Council of Governments (StanCOG) 2026 Regional Transportation Plan/Sustainable Communities Strategy (Project).

The Draft EIR was circulated for a 45-day public review period that began on July 10, 2026, and ended on August 24, 2026. StanCOG conducted public hearings on July 20, 2026, and August 19, 2026. No oral comments on the Draft EIR were received during either hearing. StanCOG received two written comment letters on the Draft EIR. The commenters and the page number on which each commenter's letter appear are listed below.

2.1 Responses to Comments

Letter No. and Commenter		Page No.
1	Jamie Silva, Environmental Program Manager, Central Valley Flood Protection Board (CVFPB)	2-2
2	Julie A. Vance, Regional Manager, California Department of Fish and Wildlife (CDFW)	2-7

The comment letters in their entirety and comment responses follow. The comment letters (defined broadly to include both letters and e-mails) are numbered sequentially and each separate issue raised by the commenter, if more than one, has been assigned a number. The responses to each comment identify first the number of the comment letter, and then the number assigned to each issue (Response 1.1, for example, indicates that the response is for the first issue raised in Comment Letter 1).

Where a comment resulted in a change to the Draft EIR text, a notation is made in the response indicating that the text is revised. Changes in text are signified by strikeout font (~~strikeout font~~) where text was removed and by underlined font (underlined font) where text was added. These changes in text are also included in Section 3, *Revisions to the Draft EIR*.

CENTRAL VALLEY FLOOD PROTECTION BOARD

3310 El Camino Ave., Ste. 170
SACRAMENTO, CA 95821
(916) 574-0609



Letter 1

July 21, 2026

Nick St Cook
Associate Planner
Stanislaus Council of Governments
nstcook@stancog.org

Subject: Comments for the Draft Program Environmental Impact Report, 2026 Regional Transportation Plan & Sustainable Communities Strategy, SCH# 2025040852, Stanislaus County

Dear Nick St Cook,

The Central Valley Flood Protection Board (Board) appreciates the opportunity to comment on the Draft Program Environmental Impact Report (PEIR) for the proposed 2026 Regional Transportation Plan & Sustainable Communities Strategy (RTP/SCS).

The 2026 RTP/SCS includes existing and projected future land use patterns and transportation plans up to 2049. The 2026 RTP/SCS covers the entirety of Stanislaus County, within which are regulated streams and designated floodways, listed in **Table 1** below, that are within the Board's permitting authority. Therefore, a Board permit may be required. Board permit information, including information on how to schedule a pre-application meeting with Board staff, is available on the [Permitting at the Central Valley Flood Protection Board website](#).

1.1

Table 1: Regulated Streams and Floodways in Stanislaus County

Waterbody Name	Board Regulated Stream	USACE 408 Federally Regulated Stream	Designated Floodway
Calaveras River	Yes	No	No
Dry Creek	Yes	No	Yes
San Joaquin River	Yes	Yes	Yes
Stanislaus River	Yes	Yes	Yes
Tuolumne River	Yes	No	Yes

Please update the list of Central Valley Flood Protection Board regulated streams under the heading **Flood and Dam Inundation – Streams and Floodplains** on page 4.10-5. Please include the Board's permit regulatory setting under heading **4.10.2.b. State Laws, Regulations, and Policies** on page 4.10-9. Please consider including the Board's evaluation of the project for a permit under the flood impact analysis **Impact HYD-3 and Impact HYD-4**, as appropriate.

1.2

California Code of Regulations, Title 23, Waters, Division 1 (Title 23) provides standards that govern the design and construction of projects that affect the flood control works and floodways. Board staff recommends that you review Title 23 Standards, including Sections 112 (Streams

1.3

Stanislaus Council of Governments

July 21, 2026

Page 2

Regulated and Nonpermissible Work Periods), 116 (Borrow and Excavation Activities – Land and Channel), 123 (Pipelines, Conduits, and Utility Lines), 124 (Abandoned Pipelines and Conduits), 126 (Fences and Gates), 128 (Bridges), 131 (Vegetation), and 132 (Bicycle Trails). Any modification to the flood control works or floodways, and any deviation or variation from the standards will require approval from the Board.

**1.3
cont.**

Responsibility of the Board

The Board is the State's regulatory agency responsible for enforcing appropriate standards for the construction, maintenance, and operation of the flood control system that protects life, property, and habitat in California's Central Valley. The Board serves as the State coordinator between local flood management agencies and the federal government, with the goal of providing the highest level of flood protection possible to California's Central Valley.

The Board operates under authorities as described in California Water Code (Water Code), which requires the Board to oversee future modifications or additions to facilities of the State Plan of Flood Control (SPFC). In addition, pursuant to assurances provided to the United States Army Corps of Engineers (USACE) by the Board on behalf of the State, the USACE Operation and Maintenance Manuals, Code of Federal Regulations, Title 33, Section 208.10, and United States Code, Title 33, Section 408, the Board is responsible for the operation and maintenance of the SPFC facilities. The USACE requires the Board to serve as the lead non-Federal sponsor for projects to improve or alter facilities of the SPFC pursuant to Code of Federal Regulations, Title 33, Section 408. The State's objectives include fulfilling the USACE's expectations pursuant to the assurances provided to the USACE.

1.4

Board Permit

Per Title 23, Section 6, approval by the Board is required for all proposed work or uses, including the alteration of levees within any area for which there is an Adopted Plan of Flood Control within the Board's jurisdiction. In addition, Board approval is required for all proposed encroachments within a floodway, on adjacent levees, and within any Regulated Stream identified in Title 23, Table 8.1. Specifically, Board jurisdiction includes the levee section, the waterward area between project levees, a minimum 10-foot-wide strip adjacent to the landward levee toe, the area within 30 feet from the top of bank(s) of Regulated Streams, and inside the Board's Designated Floodways. Activities outside of these limits which could adversely affect Federal-State flood control facilities, as determined by the Board, are also under the Board's jurisdiction. Permits may also be required for existing unpermitted encroachments or where it is necessary to establish the conditions normally imposed by permitting, including where responsibility for the encroachment has not been clearly established or ownership or uses have been changed.

1.5

Flood Impacts Analysis

Pursuant to Title 23, Section 15, the Board may deny a Board permit if the proposed project could:

- Jeopardize directly or indirectly the physical integrity of levees or other works,
- Obstruct, divert, redirect, or raise the surface level of design floods or flows, or the lesser flows for which protection is provided,
- Cause significant adverse changes in water velocity or flow regimen,

1.6

Stanislaus Council of Governments

July 21, 2026

Page 3

- Impair the inspection of floodways or project works,
- Interfere with the maintenance of floodways or project works,
- Interfere with the ability to engage in flood fighting, patrolling, or other flood emergency activities,
- Increase the damaging effects of flood flows,
- Be injurious to, or interfere with, the successful execution, functioning, or operation of any adopted plan of flood control, or
- Adversely affect the State Plan of Flood Control, as defined in the California Water Code

The Board, as a Responsible Agency under the California Environmental Quality Act (CEQA), will review and consider the environmental effects of the proposed project identified in the Draft PEIR, and will reach its own conclusions on whether and how to approve the project involved (14 CCR 15096, subd. (a)). This includes direct impacts to facilities under construction, as well as indirect impacts from the proposed project to surrounding facilities. Accordingly, the comments herein are intended to assist in the development of a robust CEQA document capable of supporting the Board's permitting process.

**1.6
cont.**

Closing

The potential risks to public safety, including increased flood risks, need to be considered when developing proposed projects that seek to modify flood control works or the hydrology of the water ways. Board staff is available to discuss any questions you have regarding the above comments. Please contact Jordan Robbins at (916) 524-3454, or via email at Jordan.Robbins@cvflood.ca.gov if you have any questions.

Sincerely,

Jamie Silva

Jamie Silva
Environmental Program Manager

cc: Office of Land Use and Climate Innovation
State.Clearinghouse@lci.ca.gov

Steve Lamb
Steven.Lamb@cvflood.ca.gov

Letter 1

Commenter: Jamie Silva, Environmental Program Manager, Central Valley Flood Protection Board (CVFPB)

Date: July 21, 2026

Response 1.1

The commenter summarizes the purpose of the 2026 RTP/SCS and provides a list of all the regulated streams and designated floodways within the CVFPB's permitting authority. The commenter provides guidance on permitting if any of the listed streams or designated floodways are within the project area. This comment does not raise any specific significant environmental issues or raise issues on the adequacy of the environmental analysis included in the EIR. No response is warranted.

Response 1.2

The commenter requests that the Draft EIR update the list of Central Valley Flood Protection Board regulated streams, include discussion of the Board's permitting authority in the regulatory framework, and consider whether projects facilitated by the RTP/SCS may require CVFPB permits under the flood impact analyses (HYD-3 and HYD-4).

The Draft EIR already identifies several CVFPB-regulated streams within the study area, including the Dry Creek, Stanislaus River, and Tuolumne River. Therefore, these waterways are already accounted for in the existing analysis and do not require additional discussion. To more accurately reflect the Central Valley Flood Protection Board regulated streams, the following has been added to Section 4.10.1, Page 4.10-5 of Section 4.10, *Hydrology*:

"Flooding can occur as a result of storm events and excessive rainfall. Pursuant to Title 23, California Code of Regulations (23 CCR) Section 112, the Central Valley Flood Protection Board maintains jurisdiction over four regulated streams, including: Dry Creek from Tuolumne River to the Atchison, Topeka and Santa Fe Railroad; Laird Slough; Calaveras River; San Joaquin River; Stanislaus River; and Tuolumne River."

The commenter also requests revisions recognizing the CVFPB as a responsible agency in Section 4.10, *Hydrology and Water Quality* under subsections 4.10.2.b Regulatory Setting – State Laws, Regulations, and Policies. However, discussion of specific agencies is not included in this section and is intended to provide information on applicable laws, regulations and policies rather than specific discussion on responsible agencies with permitting authority. Therefore, no changes have been included in subsection 4.10.2.b. No further response is necessary.

The commenter similarly requests that the CVFPB be included as a responsible agency in Impact HYD-3 and Impact HYD-4. HYD-3 evaluates potential impacts related to altered drainage patterns, flooding, stormwater capacity, and polluted runoff from transportation and land use projects. Although future projects could increase impervious surfaces and stormwater runoff, compliance with applicable stormwater, drainage, and flood management regulations would minimize these effects. Therefore, impacts would be less than significant, and additional discussion of permitting requirements would not change the impact conclusions or mitigation framework.

HYD-4 describes the potential impacts associated with flood hazards, tsunamis, and seiche zones within the project vicinity, and identified a less than significant impact. The inclusion of information on permits and the authority associated with the CVFPB would not alter the impact analysis, significance determinations, or mitigation measures, nor would it provide information necessary for informed public decision-making regarding the project's environmental effects. Accordingly, the requested addition would not be necessary to support the environmental conclusions. Therefore, no revisions to the EIR are required or have been made.

Response 1.3

The commenter describes the provisions of the California Code of Regulations, Title 23, Waters, Division 1 and recommends the review of Title 23 standards, including Sections 112, 116, 123, 124, 126, 128, 131 and 132. The commenter provides additional guidance on the applicability of Board approval for work taking place within the flood control works or floodways deviating or varying from standards. This comment does not raise any specific significant environmental issues or raise issues on the adequacy of the environmental analysis included in the EIR as no deviation or variation from standards are being requested. A variation proposed on individual project level would be addressed in the project level CEQA documentation prepared for that project. No response is warranted.

Response 1.4

The commenter describes the roles and responsibilities within the statewide regulatory framework, including the California Water Code and the CVFPB's relation to the U.S. Army Corps of Engineers. This comment does not raise any specific significant environmental issues or raise issues on the adequacy of the environmental analysis included in the EIR. No response is warranted.

Response 1.5

The commenter notes that certain activities associated with the project may be subject to the jurisdiction of the CVFPB pursuant to Title 23 and may require Board approval and/or permits. This comment does not raise any specific significant environmental issues or raise issues on the adequacy of the environmental analysis included in the EIR. No response is warranted.

Response 1.6

The commenter states that the CVFPB may deny permits for projects that adversely affect flood control facilities, flood flows, public safety, or flood management operations. The commenter notes that the CVFPB will independently evaluate the project's flood-related impacts as a Responsible Agency under CEQA. This comment does not raise any specific significant environmental issues or raise issues on the adequacy of the environmental analysis included in the EIR. No response is warranted.

STATE OF CALIFORNIA
DEPARTMENT OF FISH AND WILDLIFE



GAVIN NEWSOM, Governor
MEGHAN HERTEL, Director

Central Region
1234 East Shaw Avenue
Fresno, California 93710
(559) 243-4005
wildlife.ca.gov

Letter 2

August 18, 2026

Francisco Martin, Director of Planning
Stanislaus Council of Governments
1111 "I" Street
Modesto, California 95354
(209) 525-4600
fmartin@stancog.org

**Subject: Stanislaus Council of Governments (StanCOG) 2026 Regional
Transportation Plan/Sustainable Communities Strategy (RTP/SCS) Plan
(Plan)
Draft Program Environmental Impact Report (DPEIR)
SCH No.: 2025040852**

Dear Francisco Martin:

The California Department of Fish and Wildlife (CDFW) received a DPEIR from the StanCog, as Lead Agency for the above referenced Plan pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹

2.1

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 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.

2.2

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.

2.1
cont.

Francisco Martin, Director of Planning
Stanislaus Council of Governments
August 18, 2026
Page 2

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, future 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 projects tiered from the Plan 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.

2.2
cont.

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).

2.3

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).

2.4

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 any future project.

2.5

PLAN DESCRIPTION SUMMARY

Proponent: Stanislaus Council of Governments (StanCOG)

2.6

Objective: The Plan updates the 2022 RTP/SCS and outlines the long-term transportation and land use strategy to meet Stanislaus County’s transportation needs through 2049. The Plan identifies and prioritizes expenditures of this anticipated funding for transportation projects of all transportation modes: highways, streets and roads, transit, rail, bicycle and

Francisco Martin, Director of Planning
Stanislaus Council of Governments
August 18, 2026
Page 3

pedestrian, as well as transportation demand management measures and intelligent transportation systems.

Location: The Plan area is the entire area of Stanislaus County and includes the cities of Ceres, Hughson, Modesto, Newman, Oakdale, Patterson, Riverbank, Turlock, and Waterford, as well as unincorporated areas within the County. In addition, the Plan covers the Turlock Municipal Airport to the southeast of Stanislaus County, which is operated by the City of Turlock.

2.6
cont.

COMMENTS AND RECOMMENDATIONS

The purpose of the Plan Programmatic Environmental Impact Report (PEIR) is to inform decision makers and the public about potential significant environmental effects associated with the implementation of the Plan and Plan alternatives. 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 PEIR prepared for this Plan. CDFW previously submitted a comment letter for the Notice of Preparation on May 15, 2025 (NOP Letter; Attachment 1).

2.7

CESA Species

Mitigation measures (MMs) BIO-1(a-h) are provided to reduce potential significant impacts to special-status species and include habitat assessment, survey, avoidance, minimization, and mitigation measures.

2.8

MM BIO-1(e) and (f) detail the process for avoiding, minimizing, and mitigating for potential project-related impacts to CESA-listed species, and outline procedures for implementing agencies to acquire compensatory mitigation to mitigate for take; however, these measures do not specify that projects would need to obtain appropriate take authorization pursuant to Fish and Game Code section 2081, subdivision (b) and/or California Code of Regulations, Title 14, section 786.9, subdivision (b) to comply with CESA and the Native Plant Protection Act (NPPA) prior to engaging in take. As such, CDFW recommends that MM BIO-1(e) and (f) be modified to include the following:

Recommended Mitigation Measure 1: CESA Take Authorization

In the event that a CESA or NPPA-listed species is identified and avoidance is not feasible, consultation with CDFW is warranted to discuss how to implement the project and avoid take. If take cannot be avoided, take authorization through the acquisition of an Incidental Take Permit (ITP), pursuant to Fish and Game Code section 2081 subdivision (b) and/or California Code of Regulations, Title 14, section 786.9, subdivision (b) is necessary to comply with CESA and the NPPA.

2.9

Wildlife Corridors and Habitat Connectivity

California wildlife is losing the ability to move and migrate as habitat conversion and built infrastructure disrupts species habitat and cut off migration corridors. California Senate Bill

2.10

Francisco Martin, Director of Planning
Stanislaus Council of Governments
August 18, 2026
Page 4

(SB) 790 and Assembly Bill (AB) 2344 both address wildlife connectivity in California and assert authority and responsibility to CDFW and/or local and State agencies to implement wildlife connectivity actions by identifying where they are needed, coordinate and implement those actions, and establish compensatory mitigation credits for actions taken.

2.10
cont.

The Plan area and adjacent lands are important for providing habitat connectivity for many wildlife species, including the State threatened mountain lion – Central Coast and Southern California Distinct Population Segment (DPS) (*Puma concolor* pop. 2); the State candidate and federally proposed threatened western spadefoot (*Spea hammondi*); the State species of special concern and federally proposed threatened northwestern pond turtle (*Actinemys marmorata*); and the State species of special concern and federally threatened steelhead-Central Valley DPS (*Oncorhynchus mykiss irideus* pop.11).The 2026 Caltrans Wildlife Connectivity Program Report (Caltrans 2026) identifies Wildcat Creek as a known wildlife barrier location within the Plan area.

2.11

Implementation of the Plan could result in direct and indirect mortality, reduced reproductive success, reduced frequency of care for young resulting in reduced health or vigor of young, forcing wildlife into movement paths and areas that could increase their vulnerability to vehicle strikes and predation, and reduction in genetic exchange affecting intra-species diversity. Isolation of subpopulations limits the genetic exchange of populations and increases the risk of local extirpation. Maintaining connectivity in the Plan area is critical to ensure current and future wildlife populations’ abilities to move and adapt to a changing climate and habitat conditions.

2.12

The DPEIR notes that the Plan area has a diversity of native habitats for special-status species, including a variety of hardwood, coniferous, mixed woodlands, forests, and riparian vegetation communities occurring in and along the Stanislaus, Tuolumne, and San Joaquin Rivers, as well as along the many creeks, streams, sloughs, and various types of wetlands. MM BIO-3 is provided to reduce potential significant impacts to wildlife corridors and wildlife connectivity and requires projects to minimize impacts to wildlife connectivity by limiting the construction of permanent features that would restrict connectivity and incorporating design features such as directional and permeable wildlife fencing, minimally disruptive lighting, and creation or preservation of vegetative buffers to preserve connectivity. MM BIO-3 also requires projects to conduct wildlife movement assessments and post-construction monitoring, where feasible, to confirm wildlife use of implemented movement features and to identify any needed adaptive management. MM BIO-3(a) also states that when on-site design measures cannot fully reduce potential significant impacts, compensation shall be considered as a mitigation option, including but not limited to participation in mechanisms authorized under SB 790.

2.13

CDFW concurs with MM BIO-3 and recommends these measures be modified to incorporate the following:

Recommended Mitigation Measure 2: Analysis and Monitoring of Wildlife Corridor
CDFW recommends that wildlife connectivity assessments post-construction monitoring, site selection criteria, and design criteria follow the protocols outlined in the California

2.14

Francisco Martin, Director of Planning
 Stanislaus Council of Governments
 August 18, 2026
 Page 5

Department of Transportation (Caltrans) Wildlife Crossings Design Manual (Caltrans 2009), CDFW's Transportation Planning Companion Plan associated with the State Wildlife Action Plan (CDFW 2016), and the Federal Highway Administration Wildlife Crossing Structure Handbook (FHWA 2011).

2.14
cont.

CDFW recommends that monitoring data be analyzed, summarized, and results discussed in reports that may be posted to the project webpage and submitted to CDFW and other agencies or organizations that have a duty or interest in the effectiveness of wildlife movement corridors.

Recommended Mitigation Measure 3: Infrastructure and Project Component Design

CDFW recommends that MM BIO-3 establish measures for wildlife-friendly designs for covered activities, including but not limited to:

- **Wildlife-friendly fencing** should also be designed to deter wildlife from crossing over roads and other infrastructure and to reduce wildlife-vehicle collisions during both dry and wet seasons.
- **Culvert improvements** to support passage during wet and dry years, including but not limited to maintaining culverts to be free of sediments and vegetation; terracing to allow passage of terrestrial species where space allows; upsizing to support passage of impacted species.
- **Consideration of design features** that can support wildlife movement such as minimizing lengths (entry to exit) of dedicated wildlife crossings for certain species guilds; designs (grates, shelving, terracing, etc.) that still allow light penetration; maximizing heights of crossings or adding bridges for larger species guilds; natural cover types to encourage use; bench designs to allow use of the crossings during flooding; and smaller animal escape areas within or adjacent to the dedicated wildlife crossings.
- **Scientifically defensible wildlife corridor width** should be required. The functional width of usable linkages should be described and maintained outside of the zone of influence of edge effect. In general, a corridor should be at least two kilometers (km) wide, except at unavoidable bottlenecks such as freeway crossing structures (Beier 2018). The effective corridor width is the minimum spatial dimension needed to mitigate human influence on animal movement through the corridor (Ford et al. 2020).

2.15

CDFW also recommends coordination with regional CDFW and conservation engineering staff on the design of connectivity mitigation measures including, but not limited to, wildlife passage undercrossings, directional fencing to prevent animals from crossing roads to reduce wildlife-vehicle strikes, removal of accumulated sediment that may block undercrossings, removal of vegetation debris, control of invasive plant

2.16

Francisco Martin, Director of Planning
 Stanislaus Council of Governments
 August 18, 2026
 Page 6

species, signage to alert drivers of wildlife crossings, and education and training on wildlife crossing minimization.

**2.16
cont.**

Nesting Birds

MM BIO-1(h) is provided to reduce impacts to nesting birds and requires that a qualified biologist conduct nesting bird preconstruction surveys and implement avoidance and minimization measures. MM BIO-1(h) also requires that qualified biologist establish an appropriate no-disturbance buffer around active nests; however, no buffer distances are specified. As such, CDFW recommends MM BIO-1(h) be modified to specify that qualified biologist shall initially establish a behavioral baseline of all identified nests. Once project activities begin, CDFW recommends having a qualified biologist continuously monitor nests to detect behavioral changes resulting from project activities. If behavioral changes occur, CDFW recommends halting the work causing that change and consulting with CDFW for additional avoidance and minimization measures.

2.17

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 project site 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.

Cumulative Impacts

Currently, the DPEIR has a very broad analysis of cumulative impacts to biological resources. Additionally, the DPEIR notes that even with the implementation of biological resource mitigation measures, cumulative impacts to biological resources would be significant and cumulatively considerable. CDFW is concerned that the conclusions reached in the cumulative impacts analysis are not supported by substantial evidence, and the analysis lacks sufficient rigor and transparency to adequately develop reasonable and feasible measures to reduce harm. To address this, CDFW recommends that the DPEIR conduct a cumulative impact analysis for all biological resources that would 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 would be impacted by future projects tiered from the Plan, even if those impacts are 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. An appropriate resource study area should be identified and utilized for this analysis. CDFW staff is available for

2.18

Francisco Martin, Director of Planning
 Stanislaus Council of Governments
 August 18, 2026
 Page 7

consultation in support of cumulative impacts analyses as a trustee and responsible agency under CEQA.

2.18
cont.

Lake and Streambed Alteration Agreement

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 an entity 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 heavily modified or are ephemeral or intermittent, as well as those that are perennial in nature.

2.19

CDFW is required to comply with CEQA in the issuance of a Lake or Streambed Alteration (LSA) Agreement; therefore, if the CEQA document approved for any future tiered project does not adequately describe said project and its impacts to lakes or streams, a subsequent CEQA analysis may be necessary for LSA Agreement issuance. For information on notification requirements, please refer to CDFW's website (<https://wildlife.ca.gov/Conservation/LSA>) or contact CDFW staff in the Central Region Lake and Streambed Alteration Program at (559) 243-4593.

California Natural Diversity Database (CNDDDB) Positive Submission of Data: Please note that the CNDDDB is populated by voluntary record 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. In order to adequately assess any potential tiered project-related impacts to biological resources, surveys conducted by a qualified biologist/botanist during the appropriate protocol survey methodology are warranted in order to determine whether or not any special-status species are present at or near the project site.

2.20

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 project surveys to the CNDDDB. The CNDDDB field survey form can be filled out and submitted online at the following link: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The types of information reported to CNDDDB can be found at the following link: <https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

2.21

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

2.22

Francisco Martin, Director of Planning
 Stanislaus Council of Governments
 August 18, 2026
 Page 8

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).

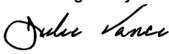
**2.22
cont.**

CONCLUSION

CDFW appreciates the opportunity to comment on the DPEIR to assist StanCOG in identifying and mitigating the Plan's impacts on biological resources. A Mitigation and Monitoring Program (MMRP) (Attachment 2) is included to assist StanCOG with incorporating the recommended mitigation measures provided above. 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 at john.riedel@wildlife.ca.gov.

2.23

Sincerely,

DocuSigned by:

 FA83F09FE08945A...

Julie A. Vance
 Regional Manager

2.24

Attachment 1 - NOP Letter
 Attachment 2 - MMRP Table

2.25

ec: State Clearinghouse
 Land Use and Climate Innovation
state.clearinghouse@lci.ca.gov

Francisco Martin, Director of Planning
Stanislaus Council of Governments
August 18, 2026
Page 9

References

Beier, P. 2018. A rule of thumb for widths of conservation corridors. *Conservation Biology* 33 (4):976-978.

California Department of Fish and Wildlife. 2016. California state wildlife action plan, transportation planning companion plan. Prepared by Blue Earth Consultants, LLC., Sacramento, California, USA.

California Department of Transportation. 2009. Wildlife crossings design manual. California Department of Transportation, Sacramento, California, USA.

California Department of Transportation. 2026. Caltrans wildlife connectivity program report. Headquarters Division of Environmental Analysis, Office of Fish and Wildlife Connectivity, Sacramento, California, USA.

Federal Highway Administration. 2011. Wildlife crossing structure handbook: Design and Evaluation in North America.

Ford, A., E. Sunter, C. Fauvelle, J. Bradshaw, B. Ford, J. Hutchen, N. Phillipow, and K. Teichman. 2020. Effective corridor width: linking the spatial ecology of wildlife with land use policy. *European Journal of Wildlife Research* 66:69.

2.26

Attachment 1



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
Page 2

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.

Elisabeth Hahn
Deputy Executive Director of Planning
May 15, 2025
Page 3

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.

Elisabeth Hahn
Deputy Executive Director of Planning
May 15, 2025
Page 4

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)

Elisabeth Hahn
Deputy Executive Director of Planning
May 15, 2025
Page 5

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.

Elisabeth Hahn
Deputy Executive Director of Planning
May 15, 2025
Page 6

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

Elisabeth Hahn
Deputy Executive Director of Planning
May 15, 2025
Page 7

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

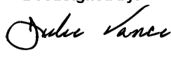
The Plan, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental 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).

Elisabeth Hahn
Deputy Executive Director of Planning
May 15, 2025
Page 8

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

Elisabeth Hahn
Deputy Executive Director of Planning
May 15, 2025
Page 9

REFERENCES

- California Department of Fish and Game. 2012. Staff report on burrowing owl mitigation. California Department of Fish and Game, Sacramento, California.
- California Department of Fish and Wildlife. 2018. Protocols for surveying and evaluating impacts to special-status native plant populations and sensitive natural communities. California Department of Fish and Wildlife, Sacramento, California.
- California Department of Fish and Wildlife. 2023. Survey considerations for California Endangered Species Act candidate bumble bee species. California Department of Fish and Wildlife, Sacramento, California.
- California Department of Fish and Wildlife. 2025. Biogeographic information and observation system (BIOS). <https://www.wildlife.ca.gov/Data/BIOS>. Accessed 02 May 2025.
- Fellers, G., and K. Freel. 1995. A standardized protocol for surveying aquatic amphibians. Technical Report. U.S. Department of the Interior, National Park Service, Western Region Biological Service, Davis, California.
- Jackman, R., and J. Jenkins. 2004. Protocol for evaluating bald eagle habitat and populations in California. Prepared for U.S. Fish and Wildlife Service, Endangered Species Division, Sacramento, California.
- Pagel, J., D. Whittington, and G. Allen. 2010. Interim golden eagle inventory and monitoring protocols; and other recommendations. Division of Migratory Bird Management, U.S. Fish and Wildlife Service, Sacramento, California.
- Swainson's Hawk Technical Advisory Committee. 2000. Recommended timing and methodology for Swainson's hawk nesting surveys in California's Central Valley. Swainson's Hawk Technical Advisory Committee.
- 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.

Elisabeth Hahn
Deputy Executive Director of Planning
May 15, 2025
Page 10

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

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			

Attachment 2

Attachment 2

**CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE
RECOMMENDED MITIGATION MONITORING AND REPORTING PROGRAM
(MMRP)**

**PROJECT: Stanislaus Council of Governments 2026 Regional
Transportation Plan/Sustainable Communities Strategy
Plan**

SCH No.: 2025040852

RECOMMENDED MITIGATION MEASURE	STATUS/DATE/INITIALS
<i>Before Disturbing Soil or Vegetation</i>	
Special-Status Species	
Recommended Mitigation Measure 1: take authorization	
Wildlife Corridors and Habitat Connectivity	
Recommended Mitigation Measure 2: Analysis and monitoring of wildlife corridor	
Recommended Mitigation Measure 3: Infrastructure and project component design	

Letter 2

Commenter: Julie A. Vance, Regional Manager, California Department of Fish and Wildlife (CDFW)

Date: August 18, 2026

Response 2.1

The commenter confirms receipt of the Draft EIR from StanCOG. The commenter thanks StanCOG for the opportunity to provide comments and recommendations regarding activities in the 2026 RTP/SCS that may affect California fish and wildlife or may be under the regulatory authority of the Fish and Game Code.

Because this comment does not raise any specific significant environmental issues or raise issues on the adequacy of the environmental analysis included in the EIR, no further response is necessary.

Response 2.2

The commenter summarizes the role and responsibilities of the CDFW as a Trustee and Responsible Agency. The commenter states that they expect CDFW may need to exercise regulatory authority in relation to lake and streambed alterations or the “take” of species protected under the California Endangered Species Act (CESA). The commenter further explains that CDFW is responsible for providing, as available, biological expertise during public agency environmental review efforts (e.g., CEQA), focusing specifically on project activities that have the potential to adversely affect fish and wildlife resources.

This comment does not pertain to the adequacy of the EIR or CEQA process, no further response is necessary.

Response 2.3

The commenter clarifies that CDFW has jurisdiction over actions the potential to result in the disturbance or destruction of active nest sites or the unauthorized take of birds. The commenter also clarifies that Sections 3503, 3503.5, and 3513 of the Fish and Game Code are meant to protect birds, their eggs, and their nests. Because the comment does not pertain to the adequacy of the EIR or CEQA process, no further response is necessary.

Response 2.4

The commenter explains that the take or possession of fully protected species is prohibited except for certain circumstances. Because the comment does not pertain to the adequacy of the EIR or CEQA process, no further response is necessary.

Response 2.5

The commenter states that species of plants or animals do not have to be officially listed as Endangered, Rare, or Threatened on any State or Federal list to be considered as such under CEQA. CDFW recommends that species that meet the criteria for these designations under CEQA Guidelines Section 15380 are fully considered in the environmental analysis for projects stemmed from the 2026 RTP/SCS.

Appendix C of the Draft EIR provides a list of special-status species that are known to occur or have the potential to occur within the StanCOG region. Special-status species are broadly defined, consistent with the commenter’s recommendation. As noted on Page 4.4-11 through Page 4.4-12 of the Draft EIR, special-status species were considered to be plants and animals listed, proposed for listing, or candidates for listing as threatened or endangered by the United States Fish and Wildlife Service under the federal Endangered Species Act; those listed or proposed for listing as rare, threatened, or endangered by the CDFW under CESA; and animals designated as “Species of Special Concern,” “Fully

Protected,” or “Watch List” by the CDFW. Furthermore, the California Natural Diversity Database provides records of other special animals that CDFW is tracking but are not currently designated as a special-status species. Because of the programmatic nature of the Draft EIR and the duration in which the 2026 RTP/SCS will be implemented, these species were also included as “special-status” considering the CDFW is currently collecting data and tracking these species and therefore there is potential for their status to be elevated in the future.

Response 2.6

The commenter summarizes the EIR’s project description of the proposed 2026 RTP/SCS. The commenter correctly summarizes the proposed project. Because the comment does not pertain to the adequacy of the EIR or CEQA process, no further response is necessary.

Response 2.7

The commenter states that their comments and recommendations are intended to help StanCOG identify and mitigate significant or potentially significant impacts on biological resources, and that they may also offer editorial suggestions to improve the EIR. The commenter references their prior letter submitted in response to the Notice of Preparation (NOP).

Because this introductory comment does not pertain to the adequacy of the EIR or CEQA process, no further response is necessary. Table 1-1 on Pages 1-8 and 1-9 in Chapter 1, *Introduction*, of the Draft EIR provides a summary of the comments and recommendations in CDFW’s NOP comment letter and how they were addressed in the Draft EIR, as applicable. Table 1-1 refers to specific sections in the Draft EIR that relate to CDFW’s comments and requests. These comments and recommendations are addressed in Section 4.4, *Biological Resources*, and Chapter 6, *Alternatives*. CDFW’s May 15, 2025 NOP comment letter is also included in Appendix A of the Draft EIR. In response to the specific comments below, clarifications or errata have been identified where necessary.

Response 2.8 and 2.9

The commenter states that Mitigation Measures BIO-1(e) and BIO-1(f) address avoidance, minimization, and mitigation for impacts to CESA-listed species but do not explicitly require appropriate take authorization pursuant to Fish and Game Code Section 2081(b) and/or California Code of Regulations, Title 14, Section 786.9(b). The commenter recommends revisions to Mitigation Measures BIO-1(e) and BIO-1(f) to clarify applicable CESA and Native Plant Protection Act (NPPA) permitting requirements.

The commenter recommends that if a CESA-listed or NPPA-listed species is identified and avoidance is not feasible, the implementing agency should consult with CDFW to determine appropriate measures to avoid take. The commenter further states that if take cannot be avoided, an Incidental Take Permit (ITP) and/or other applicable take authorization would be required to comply with CESA and NPPA.

Mitigation Measure BIO-1(e) and BIO-1(f) pertain to Endangered/Threatened Animal Species Avoidance and Compensatory Mitigation, and Endangered/Threatened and Candidate Species Avoidance and Minimization During Construction, therefore the NPPA do not apply to these measures. Consultation with CDFW will occur as part of the applicable regulatory and permitting processes, including any formal permit application review. However, agency consultation is not mitigation under CEQA. CEQA mitigation must be adopted by the lead agency, be enforceable, and include measurable performance standards, monitoring, and assigned responsibility. The revised mitigation measures address CDFW’s comment on addressing State candidate species.

The following revision has been made to Page 4.4-27 to Page 4.4-28, of Section 4.4, *Biological Resources*.

BIO-1(c) Special-Status Plant Species Avoidance, Minimization, and Mitigation

If state or federally listed and/or CRPR 1 and 2 species are found during special-status plant surveys [pursuant to mitigation measure BIO-1(b)], then the implementing agency shall redesign the project to avoid impacting these plant species to the maximum extent feasible. Occurrences of these species that are not within the immediate disturbance footprint but are located within 50 feet of disturbance limits shall have bright orange protective fencing installed at least 30 feet beyond their extent, or other distance as approved by a qualified biologist, to protect them from harm. If CRPR 3 and 4 species are found, the qualified biologist contracted to conduct the plant surveys [pursuant to mitigation measure BIO-1(b)] shall evaluate to determine if they meet criteria to be considered special-status, and if so, the same process as identified for CRPR 1 and 2 species shall apply.

If special-status plants species cannot be avoided and would be impacted by a project implemented under the proposed 2026 RTP/SCS, the implementing agency shall require all impacts to be mitigated at an appropriate ratio to fully offset project impacts, as determined by a qualified biologist for each species as a component of habitat restoration. A restoration plan shall be prepared and submitted to the implementing agency. The implementing agency shall obtain all necessary regulatory permits for impacts to state listed, state candidate, federally listed and/or plants listed as rare under the Native Plant Protection Act, as applicable, prior to any vegetation or ground-disturbing activities.

BIO-1(e) Endangered/Threatened Animal Species Avoidance and Compensatory Mitigation

If habitat is occupied or presumed occupied by federal and/or state listed or candidate species and would be impacted by the project, the implementing agency shall redesign the project in coordination with a qualified biologist to avoid impacting occupied/presumed occupied habitat to the extent feasible. If occupied or presumed occupied habitat cannot be avoided, the implementing agency shall estimate the total acreages for habitat that would be impacted prior to the issuance of construction permits/approvals.

Compensatory mitigation shall be achieved through purchase of credits at a USFWS, NMFS and/or CDFW approved conservation bank if available for the affected species, and/or through providing compensatory mitigation to offset impacts to federal and/or state listed or candidate species habitat. Compensatory mitigation shall be provided at an appropriate ratio to fully offset project impacts, as determined by a qualified biologist for permanent impacts. Compensatory mitigation may be combined/nested with special-status plant species and sensitive community restoration where applicable. Temporary impact areas shall be restored to pre-project conditions.

If on and/or off-site compensatory mitigation sites are identified, the implementing agency shall retain a qualified biologist to prepare a Habitat Mitigation and Monitoring Plan (HMMP) to ensure the success of compensatory mitigation sites that are to be conserved for compensation of permanent impacts to federal and/or state listed or candidate species. The HMMP shall identify long term site management needs, routine monitoring techniques, techniques, and success criteria, and shall determine if the conservation site has restoration needs to function as a suitable mitigation site. If restoration is required on the conservation site, the HMMP shall contain the restoration components outlined under the Restoration Plan listed in measure BIO-1(c). The HMMP shall be submitted to the implementing agency for review and approval. The implementing agency shall obtain all necessary regulatory permits for impacts to state listed, state candidate, federally listed animal species, prior to any vegetation- or ground-disturbance, or other activities which could disturb the species.

Response 2.10 to 2.16

The commenter explains that habitat conversion and built infrastructure can disrupt wildlife movement, migration, and habitat connectivity throughout California. The commenter notes that SB 790 and AB 2344 address wildlife connectivity and establish responsibilities for CDFW and other state and local agencies

to identify, coordinate, and implement wildlife connectivity actions where needed, including the development of compensatory mitigation programs. The commenter further notes that the 2026 Caltrans Wildlife Connectivity Program Report identifies Wildcat Creek within the Plan area as a known wildlife barrier location. The commenter notes that isolation of wildlife populations can increase the risk of local extirpation and emphasizes that maintaining habitat connectivity within the Plan area is important to support wildlife movement and adaptation to changing climate and habitat conditions. This comment describes the biological resources present within the Plan area and summarizes Mitigation Measure BIO-3(a) included in the Draft PEIR related to wildlife connectivity.

The commenter concurs with Mitigation Measure BIO-3 and recommends revisions to further clarify requirements for wildlife connectivity assessments, site selection criteria, design criteria, and post-construction monitoring. The commenter recommends that these activities be conducted in accordance with guidance provided in the Caltrans Wildlife Crossings Design Manual, the CDFW Wildlife Action Plan, and the Federal Highway Administration Wildlife Crossing Structure Handbook. In response to several of the commenter's comments on habitat connectivity and wildlife corridors, the following revision has been made to Mitigation Measure BIO-3(a) on Pages 4.4-38 to 4.4-39 of Section 4.4, *Biological Resources*.

BIO-3(a) Project Design for Wildlife Connectivity

All projects including long segments of fencing and lighting shall be designed to minimize impacts to wildlife movement. Fencing shall not be installed at the openings of culverts, undercrossings, or other wildlife passage structures unless required for public safety; where fencing is necessary, it shall be placed far enough from the structure entrance to avoid blocking wildlife access and shall include design features that maintain clear, functional movement pathways.

Where fencing or other project components that may disrupt wildlife movement is required for public safety concerns, they shall be designed to permit wildlife movement by incorporating design features such as:

- A minimum 16 inches between the ground and the bottom of the fence to provide clearance for small animals;
- A minimum 12 inches between the top two wires, or top the fence with a wooden rail, mesh, or chain link instead of wire to prevent animals from becoming entangled; and
- If privacy fencing is required near open space areas, openings at the bottom of the fence measure at least 16 inches in diameter shall be installed at reasonable intervals to allow wildlife movement, or the fence may be installed with the bottom at least 16 inches above the ground level.
- If fencing or other project components must be designed in such a manner that wildlife passage would not be permitted, wildlife crossing structures shall be incorporated into the project design as appropriate.
- Wildlife-friendly fencing shall be designed to deter wildlife from crossing over roads and other infrastructure and to reduce wildlife vehicle collisions during the wet and dry seasons.
- Culverts shall be maintained to be free of sediment and vegetation to ensure continued functionality for wildlife passage;
- Project designs shall incorporate terracing to facilitate terrestrial species movement where space allows;
- Culverts shall be upsized where appropriate to support passage of impacted species and utilize designs that still allow light penetration;
- Crossing structures shall incorporate bench designs where feasible to allow wildlife use of the crossings during flooding, and include smaller animal escape areas within or adjacent to the wildlife crossing;
- Lighting installed as part of any project shall be designed to be minimally disruptive to wildlife (see mitigation measure AES-3(a) Roadway Lighting for lighting requirements);

- Vegetative buffers, consisting of California native plant and tree species, shall be installed where feasible to provide a natural noise barrier between roadway projects and sensitive wildlife habitat, including movement corridors. The buffer shall be maintained in perpetuity to ensure noise levels from the roadway are minimized within adjacent sensitive habitat; and
- Project design elements shall take into account the recommendations in the Caltrans Wildlife Crossings Design Manual, the CDFW Wildlife Action Plan, and the Federal Highway Administration Wildlife Crossing Structure Handbook, in determining the best approach to project design and need for post construction monitoring to evaluate effectiveness.

In addition, prior to design approval, implementing agencies shall conduct wildlife movement assessments to evaluate connectivity constraints and identify opportunities to maintain or enhance wildlife movement. Post-construction monitoring shall be conducted, where feasible, to confirm wildlife use of implemented movement features and to identify any needed adaptive management. When on-site design measures cannot fully reduce impacts, compensation shall be considered as a mitigation option, including but not limited to participation in mechanisms authorized under SB 790, to reduce unavoidable connectivity impacts at a landscape scale.

If the wildlife movement assessment determines that a project could substantially interfere with an identified regional or locally important wildlife movement corridor, habitat linkage, movement bottleneck, drainage used for wildlife passage, existing or planned wildlife crossing, or other location important to maintaining wildlife connectivity, the implementing agency shall coordinate with the appropriate CDFW regional staff during development of the project's connectivity design measures.

Mitigation Measure BIO 3(a) has been further clarified to include culvert improvements to support wildlife passage during both wet and dry years, including but not limited to maintaining culverts free of sediment and vegetation, terracing where space allows to facilitate terrestrial species movement, and upsizing culverts to support passage of impacted species. No further response is required.

Mitigation Measure BIO-3(a) requires project design to consider wildlife connectivity and provides a non-exhaustive list of design parameters meant to promote wildlife movement, consistent with the commenter's suggestion. Mitigation Measure BIO 3(a) has been further clarified to include consultation if the wildlife movement assessment determines that a project could substantially interfere with wildlife movement.

Response 2.17

The commenter notes that Mitigation Measure BIO-1(h) requires preconstruction nesting bird surveys and implementation of avoidance and minimization measures but does not identify specific buffer distances around active nests. The commenter recommends revising the measure to include establishment of nest-specific behavioral baselines, monitoring of active nests during construction, consultation with CDFW if project activities result in behavioral changes, and minimum no-disturbance buffers of 250 feet for non-listed bird species and 500 feet for non-listed raptors where continuous monitoring is not feasible. The commenter also recommends that any variance from these buffer distances be supported by a qualified biologist and coordinated with CDFW.

It is noted that Mitigation Measure BIO-1(h) already requires establishment of species-appropriate avoidance buffers by a qualified biologist. If a project does not require a discretionary approval or permit from CDFW, CDFW would have no formal project-specific consultation role in establishing nest buffers. Additionally, agency consultation is not mitigation under CEQA. CEQA mitigation must be adopted by the lead agency, be enforceable, and include measurable performance standards, monitoring, and assigned responsibility. Mitigation Measure BIO-1(h) has been revised to incorporate the commenter's recommendations for nest monitoring on Page 4.4-30 of Section 4.4, *Biological Resources*.

BIO-1(h) Preconstruction Surveys for Nesting Birds

For construction activities occurring during the nesting season (generally February 1 to September 15), surveys for nesting birds covered by the CFGC, the MBTA, and Bald and Golden Eagle Protection Act shall be conducted by a qualified biologist no more than 10 days prior to vegetation removal activities.

A qualified biologist shall conduct preconstruction surveys for raptors. The survey for the presence of bald and golden eagles shall cover all areas within of the disturbance footprint plus a one-mile buffer where access can be secured. The survey area for all other nesting bird and raptor species shall include the disturbance footprint plus a 300-foot and 500-foot buffer, respectively.

If active nests (nests with eggs or chicks) are located, the qualified biologist shall establish an appropriate avoidance buffer based on the species biology and the current and anticipated disturbance levels occurring in vicinity of the nest. If the buffer for non-listed passerines is less than 250ft, or 500 ft for non-listed raptors, the biologist shall monitor the nest for signs of disturbance and normal baseline behavior during the first day of construction. If the individuals show signs of disturbance, such as scolding, flushing, or hesitating when returning to the nest, the buffer shall be increased. All buffers shall be marked using high visibility flagging or fencing, and, unless approved by the qualified biologist, no construction activities shall be allowed within the buffers until the qualified biologist has verified that young have fledged from the nest, or the nest fails.

For bald or golden eagle nests identified during the preconstruction surveys, an avoidance buffer of up to one mile shall be established by a qualified biologist on a case-by-case basis in consultation with the USFWS and CDFW. The size of the buffer may be influenced by the existing conditions and disturbance regime, relevant landscape characteristics, and the nature, timing, and duration of the expected disturbance. The buffer shall be established between February 1 and September 15; however, buffers may be relaxed earlier than September 15 if a qualified biologist determines that a given nest has failed or that all surviving chicks have fledged, and the nest is no longer in use.

The qualified biologist shall prepare a report of these preconstruction nesting bird surveys and nest monitoring (if applicable) to be submitted by the qualified biologist to the implementing agency for review and approval prior to the start of construction.

Response 2.18

The commenter states that the cumulative impacts analysis for biological resources is overly broad and that the conclusion that impacts would remain significant and cumulatively considerable is not supported by sufficient evidence or analysis.

The EIR provides a program-level evaluation of cumulative biological resource impacts consistent with CEQA requirements for a regional transportation plan. According to CEQA Guidelines Section 15204(a), a lead agency is not required to “conduct every test or perform all research, study, and experimentation recommended or demanded by commentors”. The EIR’s program-level analysis of cumulative impacts related to implementation of the RTP/SCS is adequate under CEQA, and detailed project-level analysis of cumulative impacts due to the implementation of specific projects is properly deferred to second-tier CEQA documents. At that time, consultation with CDFW on cumulative impacts would occur as required by CEQA.

Refer to CEQA Guidelines Section 15152(c), which notes that when a lead agency is using the tiering process for large scale planning approval, the development of detailed site-specific information can be properly deferred to second-tier environmental documents as long as significant effects of the planning approval are adequately disclosed. It is appropriate for programmatic CEQA documents to include a “general level of analysis of cumulative impacts” and to “defer more specific discussion of cumulative impacts to site-specific environmental documents. (Western States Petroleum Association v. State Air Resources Board (2025) 108 Cal. App. 4th 938, 988.) No further response is necessary.

Response 2.19

The commenter requests that CDFW's Lake and Streambed Alteration Program be notified prior to conducting any project activities that have the potential to impact or change the bed, bank, and channel of rivers, streams, and other waterways.

State law requires implementing agencies to notify CDFW's Lake and Streambed Alteration Program pursuant to Fish and Game Code Section 1600 et seq., prior to conducting any project activities that affect waters regulated under this program. The lake and streambed alteration agreement program requirements are acknowledged on Draft EIR Page 4.4-32. No further response is necessary.

Response 2.20

The commenter notes that the California Natural Diversity Database (CNDDDB) may not contain all occurrences of special-status species because species records are submitted voluntarily and the absence of a documented occurrence does not necessarily indicate that a species is absent from a site. The commenter recommends that future projects implementing the RTP/SCS conduct biological surveys by qualified biologists and botanists using appropriate protocols and survey methodologies during suitable survey periods to determine the presence or absence of special-status species and evaluate potential impacts to biological resources. This comment provides recommendations regarding future project-level biological resource surveys and impact assessments and does not identify a deficiency in the overall adequacy of the biological resources analysis presented in the EIR. It is noted that future projects implementing the RTP/SCS will be subject to project-specific environmental review, including biological resource surveys and evaluation of special-status species, as appropriate. No further response is necessary.

Response 2.21

The commenter restates Public Resources Code Section 21003(e) and requests that any special-status species or natural communities detected during project surveys be reported to the CNDDDB, provides a weblink to the CNDDDB field survey form, and information regarding form submittal.

Public Resources Code Section 21003(e) establishes a state policy that information developed in CEQA documents should be incorporated into a database that can be used to make subsequent or supplemental environmental determinations. When project-specific CEQA documents are prepared, special-status species or natural communities detected during project surveys will be reported to the CNDDDB consistent with Public Resources Code Section 21003(e). Because the comment does not pertain to the adequacy of the EIR or CEQA process, no further response is necessary.

Response 2.22

The commenter notes that filing fees, which help defray the cost of environmental review by CDFW, are payable upon filing of the NOD.

Filing fees will be paid upon filing the RTP/SCS NOD, as required by Public Resources Code Section 21089.

Response 2.23

The commenter explains they appreciate the opportunity to comment on the Draft EIR and provides a link to a CDFW webpage with more information on survey and monitoring protocols. The commenter also provided an attachment of a recommended Mitigation and Monitoring Program (MMRP). The commenter additionally provides contact information, should StanCOG have any questions regarding the comment letter or require any further coordination.

The recommended MMRP reiterates the three mitigation measures suggested previously in the comments above. Please see the above responses, including Responses 2.9, 2.14 and 2.17, for information regarding the commenter's suggested mitigation measures. To the extent the commenter's suggested mitigation measures are incorporated in the RTP/SCS EIR mitigation measures, they will be included in the EIR's MMRP, consistent with CEQA requirements. The contact information provided in this comment is noted.

Response 2.24

The commenter provides a list of attachments that are referenced in their letter. This specific comment refers to Attachment 1, which is CDFW's May 2025 NOP comment letter.

Refer to Response 2.7 for information regarding how StanCOG responded to CDFW's May 2025 NOP letter.

Response 2.25

The commenter provides a list of attachments that are referenced in their letter. This specific comment refers to Attachment 2, which is the MMRP described in Response 2.23.

Refer to Response 2.23 for information regarding the commenter's recommended MMRP.

Response 2.26

The commenter provides a list of citations that are referenced throughout their letter.

These references were reviewed along with their respective comments within the letter and were considered when providing individual responses to comments. Because the comment does not pertain to the adequacy of the EIR or CEQA process, no further response is required.

This page intentionally left blank.

3 Errata to the Draft EIR

This chapter presents specific text changes made to the Draft EIR since its publication and public review. The changes are presented in the order in which they appear in the original Draft EIR and are identified by the Draft EIR page number. Text deletions are shown in ~~strike through~~, and text additions are shown in underline. The information contained within this chapter clarifies and expands on information in the Draft EIR and does not constitute “significant new information” requiring recirculation. (See Public Resources Code Section 21092.1; CEQA Guidelines Section 15088.5.)

3.1 Revisions to the Draft EIR

Executive Summary

Page ES-9:

BIO-1(c) Special-Status Plant Species Avoidance, Minimization, and Mitigation. If state or federally listed and/or CRPR 1 and 2 species are found during special-status plant surveys [pursuant to mitigation measure BIO-1(b)], then the implementing agency shall redesign the project to avoid impacting these plant species to the maximum extent feasible. Occurrences of these species that are not within the immediate disturbance footprint but are located within 50 feet of disturbance limits shall have bright orange protective fencing installed at least 30 feet beyond their extent, or other distance as approved by a qualified biologist, to protect them from harm. If CRPR 3 and 4 species are found, the qualified biologist contracted to conduct the plant surveys [pursuant to mitigation measure BIO-1(b)] shall evaluate to determine if they meet criteria to be considered special-status, and if so, the same process as identified for CRPR 1 and 2 species shall apply.

If special-status plants species cannot be avoided and would be impacted by a project implemented under the proposed 2026 RTP/SCS, the implementing agency shall require all impacts to be mitigated at an appropriate ratio to fully offset project impacts, as determined by a qualified biologist for each species as a component of habitat restoration. A restoration plan shall be prepared and submitted to the implementing agency. The implementing agency shall obtain all necessary regulatory permits for impacts to state listed, state candidate, federally listed and/or plants listed as rare under the Native Plant Protection Act, as applicable, prior to any vegetation or ground-disturbing activities.

[xxx]

BIO-1(e) Endangered/Threatened Animal Species Avoidance and Compensatory Mitigation. If habitat is occupied or presumed occupied by federal and/or state listed or candidate species and would be impacted by the project, the implementing agency shall redesign the project in coordination with a qualified biologist to avoid impacting occupied/presumed occupied habitat to the extent feasible. If occupied or presumed occupied habitat cannot be avoided, the implementing agency shall estimate the total acreages for habitat that would be impacted prior to the issuance of construction permits/approvals.

Compensatory mitigation shall be achieved through purchase of credits at a USFWS, NMFS and/or CDFW approved conservation bank if available for the affected species, and/or through providing compensatory mitigation to offset impacts to federal and/or state listed or candidate species habitat. Compensatory mitigation shall be provided at an appropriate ratio to fully offset project impacts, as determined by a qualified biologist for permanent impacts. Compensatory mitigation may be combined/nested with special-status plant species and sensitive community restoration where applicable. Temporary impact areas shall be restored to pre-project conditions.

If on and/or off-site compensatory mitigation sites are identified, the implementing agency shall retain a qualified biologist to prepare a Habitat Mitigation and Monitoring Plan (HMMP) to ensure the success of compensatory mitigation sites that are to be conserved for compensation of permanent impacts to federal and/or state listed or candidate species. The HMMP shall identify long term site management needs, routine monitoring techniques, techniques, and success criteria, and shall determine if the conservation site has restoration needs to function as a suitable mitigation site. If restoration is required on the conservation site, the HMMP shall contain the restoration components outlined under the Restoration Plan listed in measure BIO-1(c). The HMMP shall be submitted to the implementing agency for review and approval. The implementing agency shall obtain all necessary regulatory permits for impacts to state listed, state candidate, federally listed animal species, prior to any vegetation- or ground-disturbance, or other activities which could disturb the species.

Page ES-10:

BIO-1(h) Preconstruction Surveys for Nesting Birds. For construction activities occurring during the nesting season (generally February 1 to September 15), surveys for nesting birds covered by the CFGC, the MBTA, and Bald and Golden Eagle Protection Act shall be conducted by a qualified biologist no more than 10 days prior to vegetation removal activities.

A qualified biologist shall conduct preconstruction surveys for raptors. The survey for the presence of bald and golden eagles shall cover all areas within of the disturbance footprint plus a one-mile buffer where access can be secured. The survey area for all other nesting bird and raptor species shall include the disturbance footprint plus a 300-foot and 500-foot buffer, respectively.

If active nests (nests with eggs or chicks) are located, the qualified biologist shall establish an appropriate avoidance buffer based on the species biology and the current and anticipated disturbance levels occurring in vicinity of the nest. If the buffer for non-listed passerines is less than 250ft, or 500 ft for non-listed raptors, the biologist shall monitor the nest for signs of disturbance and normal baseline behavior during the first day of construction. If the individuals show signs of disturbance, such as scolding, flushing, or hesitating when returning to the nest, the buffer shall be increased. All buffers shall be marked using high visibility flagging or fencing, and, unless approved by the qualified biologist, no construction activities shall be allowed within the buffers until the qualified biologist has verified that young have fledged from the nest, or the nest fails.

For bald or golden eagle nests identified during the preconstruction surveys, an avoidance buffer of up to one mile shall be established by a qualified biologist on a case-by-case basis in consultation with the USFWS and CDFW. The size of the buffer may be influenced by the existing conditions and disturbance regime, relevant landscape characteristics, and the nature, timing, and duration of the expected disturbance. The buffer shall be established between February 1 and September 15; however, buffers may be relaxed earlier than September 15 if a qualified biologist determines that a given nest has failed or that all surviving chicks have fledged, and the nest is no longer in use.

The qualified biologist shall prepare a report of these preconstruction nesting bird surveys and nest monitoring (if applicable) to be submitted by the qualified biologist to the implementing agency for review and approval prior to the start of construction.

Page ES-12:

BIO-3(a) Project Design for Wildlife Connectivity. All projects including long segments of fencing and lighting shall be designed to minimize impacts to wildlife movement. Fencing shall not be installed at the openings of culverts, undercrossings, or other wildlife passage structures unless required for public safety; where fencing is necessary, it shall be placed far enough from the structure entrance to avoid blocking wildlife access and shall include design features that maintain clear, functional movement pathways.

Where fencing or other project components that may disrupt wildlife movement is required for public safety concerns, they shall be designed to permit wildlife movement by incorporating design features such as:

- A minimum 16 inches between the ground and the bottom of the fence to provide clearance for small animals;
- A minimum 12 inches between the top two wires, or top the fence with a wooden rail, mesh, or chain link instead of wire to prevent animals from becoming entangled; and
- If privacy fencing is required near open space areas, openings at the bottom of the fence measure at least 16 inches in diameter shall be installed at reasonable intervals to allow wildlife movement, or the fence may be installed with the bottom at least 16 inches above the ground level.
- If fencing or other project components must be designed in such a manner that wildlife passage would not be permitted, wildlife crossing structures shall be incorporated into the project design as appropriate.
- Wildlife-friendly fencing shall be designed to deter wildlife from crossing over roads and other infrastructure and to reduce wildlife vehicle collisions during the wet and dry seasons.
- Culverts shall be maintained to be free of sediment and vegetation to ensure continued functionality for wildlife passage;
- Project designs shall incorporate terracing to facilitate terrestrial species movement where space allows;
- Culverts shall be upsized where appropriate to support passage of impacted species and utilize designs that still allow light penetration;
- Crossing structures shall incorporate bench designs where feasible to allow wildlife use of the crossings during flooding, and include smaller animal escape areas within or adjacent to the wildlife crossing;
- Lighting installed as part of any project shall be designed to be minimally disruptive to wildlife (see mitigation measure AES-3(a) Roadway Lighting for lighting requirements);
- Vegetative buffers, consisting of California native plant and tree species, shall be installed where feasible to provide a natural noise barrier between roadway projects and sensitive wildlife habitat, including movement corridors. The buffer shall be maintained in perpetuity to ensure noise levels from the roadway are minimized within adjacent sensitive habitat; and
- Project design elements shall take into account the recommendations in the Caltrans Wildlife Crossings Design Manual, the CDFW Wildlife Action Plan, and the Federal Highway Administration Wildlife Crossing Structure Handbook, in determining the best approach to project design and need for post construction monitoring to evaluate effectiveness.

In addition, prior to design approval, implementing agencies shall conduct wildlife movement assessments to evaluate connectivity constraints and identify opportunities to maintain or enhance wildlife movement. Post-construction monitoring shall be conducted, where feasible, to confirm wildlife use of implemented movement features and to identify any needed adaptive management. When on-site design measures cannot fully reduce impacts, compensation shall be considered as a mitigation option, including but not limited to participation in mechanisms authorized under SB 790, to reduce unavoidable connectivity impacts at a landscape scale.

If the wildlife movement assessment determines that a project could substantially interfere with an identified regional or locally important wildlife movement corridor, habitat linkage, movement bottleneck, drainage used for wildlife passage, existing or planned wildlife crossing, or other location important to maintaining wildlife connectivity, the implementing agency shall coordinate with the appropriate CDFW regional staff during development of the project's connectivity design measures.

Page ES-15:

Impact GHG-3: The transportation improvements and land use projects envisioned by the proposed 2026 RTP/SCS would not conflict with regional SB 375 per capita passenger vehicle CO2 emission reduction targets of 16 percent by 2035 from 2005 levels. Impacts would be less than significant.

Section 4.4, Biological Resources

Page 4.4-27:

BIO-1(c) Special-Status Plant Species Avoidance, Minimization, and Mitigation.

If state or federally listed and/or CRPR 1 and 2 species are found during special-status plant surveys [pursuant to mitigation measure BIO-1(b)], then the implementing agency shall redesign the project to avoid impacting these plant species to the maximum extent feasible. Occurrences of these species that are not within the immediate disturbance footprint but are located within 50 feet of disturbance limits shall have bright orange protective fencing installed at least 30 feet beyond their extent, or other distance as approved by a qualified biologist, to protect them from harm. If CRPR 3 and 4 species are found, the qualified biologist contracted to conduct the plant surveys [pursuant to mitigation measure BIO-1(b)] shall evaluate to determine if they meet criteria to be considered special-status, and if so, the same process as identified for CRPR 1 and 2 species shall apply.

If special-status plants species cannot be avoided and would be impacted by a project implemented under the proposed 2026 RTP/SCS, the implementing agency shall require all impacts to be mitigated at an appropriate ratio to fully offset project impacts, as determined by a qualified biologist for each species as a component of habitat restoration. A restoration plan shall be prepared and submitted to the implementing agency. The implementing agency shall obtain all necessary regulatory permits for impacts to state listed, state candidate, federally listed and/or plants listed as rare under the Native Plant Protection Act, as applicable, prior to any vegetation or ground-disturbing activities.

Page 4.4-28:

BIO-1(e) Endangered/Threatened Animal Species Avoidance and Compensatory Mitigation.

If habitat is occupied or presumed occupied by federal and/or state listed or candidate species and would be impacted by the project, the implementing agency shall redesign the project in coordination with a qualified biologist to avoid impacting occupied/presumed occupied habitat to the extent feasible. If occupied or presumed occupied habitat cannot be avoided, the implementing agency shall estimate the total acreages for habitat that would be impacted prior to the issuance of construction permits/approvals.

Compensatory mitigation shall be achieved through purchase of credits at a USFWS, NMFS and/or CDFW approved conservation bank if available for the affected species, and/or through providing compensatory mitigation to offset impacts to federal and/or state listed or candidate species habitat. Compensatory mitigation shall be provided at an appropriate ratio to fully offset project impacts, as determined by a qualified biologist for permanent impacts. Compensatory mitigation may be combined/nested with special-status plant species and sensitive community restoration where applicable. Temporary impact areas shall be restored to pre-project conditions.

If on and/or off-site compensatory mitigation sites are identified, the implementing agency shall retain a qualified biologist to prepare a Habitat Mitigation and Monitoring Plan (HMMP) to ensure the success of compensatory mitigation sites that are to be conserved for compensation of permanent impacts to federal and/or state listed or candidate species. The HMMP shall identify long term site management needs, routine monitoring techniques, techniques, and success criteria, and shall determine if the conservation site has restoration needs to function as a suitable mitigation site. If restoration is required on the conservation site, the HMMP shall contain the restoration components outlined under the Restoration Plan listed in measure BIO-1(c). The HMMP shall be submitted to the

implementing agency for review and approval. The implementing agency shall obtain all necessary regulatory permits for impacts to state listed, state candidate, federally listed animal species, prior to any vegetation- or ground-disturbance, or other activities which could disturb the species.

Page 4.4-30:

BIO-1(h) Preconstruction Surveys for Nesting Birds.

For construction activities occurring during the nesting season (generally February 1 to September 15), surveys for nesting birds covered by the CFGC, the MBTA, and Bald and Golden Eagle Protection Act shall be conducted by a qualified biologist no more than 10 days prior to vegetation removal activities.

A qualified biologist shall conduct preconstruction surveys for raptors. The survey for the presence of bald and golden eagles shall cover all areas within of the disturbance footprint plus a one-mile buffer where access can be secured. The survey area for all other nesting bird and raptor species shall include the disturbance footprint plus a 300-foot and 500-foot buffer, respectively.

If active nests (nests with eggs or chicks) are located, the qualified biologist shall establish an appropriate avoidance buffer based on the species biology and the current and anticipated disturbance levels occurring in vicinity of the nest. If the buffer for non-listed passerines is less than 250ft, or 500 ft for non-listed raptors, the biologist shall monitor the nest for signs of disturbance and normal baseline behavior during the first day of construction. If the individuals show signs of disturbance, such as scolding, flushing, or hesitating when returning to the nest, the buffer shall be increased. All buffers shall be marked using high visibility flagging or fencing, and, unless approved by the qualified biologist, no construction activities shall be allowed within the buffers until the qualified biologist has verified that young have fledged from the nest, or the nest fails.

For bald or golden eagle nests identified during the preconstruction surveys, an avoidance buffer of up to one mile shall be established by a qualified biologist on a case-by-case basis in consultation with the USFWS and CDFW. The size of the buffer may be influenced by the existing conditions and disturbance regime, relevant landscape characteristics, and the nature, timing, and duration of the expected disturbance. The buffer shall be established between February 1 and September 15; however, buffers may be relaxed earlier than September 15 if a qualified biologist determines that a given nest has failed or that all surviving chicks have fledged, and the nest is no longer in use.

The qualified biologist shall prepare a report of these preconstruction nesting bird surveys and nest monitoring (if applicable) to be submitted by the qualified biologist to the implementing agency for review and approval prior to the start of construction.

Pages 4.4-38 to 4.4-39:

BIO-3(a) Project Design for Wildlife Connectivity. All projects including long segments of fencing and lighting shall be designed to minimize impacts to wildlife movement. Fencing shall not be installed at the openings of culverts, undercrossings, or other wildlife passage structures unless required for public safety; where fencing is necessary, it shall be placed far enough from the structure entrance to avoid blocking wildlife access and shall include design features that maintain clear, functional movement pathways.

Where fencing or other project components that may disrupt wildlife movement is required for public safety concerns, they shall be designed to permit wildlife movement by incorporating design features such as:

- A minimum 16 inches between the ground and the bottom of the fence to provide clearance for small animals;
- A minimum 12 inches between the top two wires, or top the fence with a wooden rail, mesh, or chain link instead of wire to prevent animals from becoming entangled; and

- If privacy fencing is required near open space areas, openings at the bottom of the fence measure at least 16 inches in diameter shall be installed at reasonable intervals to allow wildlife movement, or the fence may be installed with the bottom at least 16 inches above the ground level.
- If fencing or other project components must be designed in such a manner that wildlife passage would not be permitted, wildlife crossing structures shall be incorporated into the project design as appropriate.
- Wildlife-friendly fencing shall be designed to deter wildlife from crossing over roads and other infrastructure and to reduce wildlife vehicle collisions during the wet and dry seasons.
- Culverts shall be maintained to be free of sediment and vegetation to ensure continued functionality for wildlife passage;
- Project designs shall incorporate terracing to facilitate terrestrial species movement where space allows;
- Culverts shall be upsized where appropriate to support passage of impacted species and utilize designs that still allow light penetration;
- Crossing structures shall incorporate bench designs where feasible to allow wildlife use of the crossings during flooding, and include smaller animal escape areas within or adjacent to the wildlife crossing;
- Lighting installed as part of any project shall be designed to be minimally disruptive to wildlife (see mitigation measure AES-3(a) Roadway Lighting for lighting requirements);
- Vegetative buffers, consisting of California native plant and tree species, shall be installed where feasible to provide a natural noise barrier between roadway projects and sensitive wildlife habitat, including movement corridors. The buffer shall be maintained in perpetuity to ensure noise levels from the roadway are minimized within adjacent sensitive habitat; and
- Project design elements shall take into account the recommendations in the Caltrans Wildlife Crossings Design Manual, the CDFW Wildlife Action Plan, and the Federal Highway Administration Wildlife Crossing Structure Handbook, in determining the best approach to project design and need for post construction monitoring to evaluate effectiveness.

In addition, prior to design approval, implementing agencies shall conduct wildlife movement assessments to evaluate connectivity constraints and identify opportunities to maintain or enhance wildlife movement. Post-construction monitoring shall be conducted, where feasible, to confirm wildlife use of implemented movement features and to identify any needed adaptive management. When on-site design measures cannot fully reduce impacts, compensation shall be considered as a mitigation option, including but not limited to participation in mechanisms authorized under SB 790, to reduce unavoidable connectivity impacts at a landscape scale.

If the wildlife movement assessment determines that a project could substantially interfere with an identified regional or locally important wildlife movement corridor, habitat linkage, movement bottleneck, drainage used for wildlife passage, existing or planned wildlife crossing, or other location important to maintaining wildlife connectivity, the implementing agency shall coordinate with the appropriate CDFW regional staff during development of the project's connectivity design measures.

Section 4.8, Greenhouse Gas Emissions and Climate Change

Page 4.8-23:

Impact GHG-3 THE TRANSPORTATION IMPROVEMENTS AND LAND USE PROJECTS ENVISIONED BY THE PROPOSED 2026 RTP/SCS WOULD NOT CONFLICT WITH REGIONAL SB 375 PER CAPITA PASSENGER VEHICLE CO₂ EMISSION REDUCTION TARGETS OF 16 PERCENT BY 2035 FROM 2005 LEVELS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Section 4.10, Hydrology

Page 4.10-5:

“Flooding can occur as a result of storm events and excessive rainfall. Pursuant to Title 23, California Code of Regulations (23 CCR) Section 112, the Central Valley Flood Protection Board maintains jurisdiction over four regulated streams, including: Dry Creek from Tuolumne River to the Atchison, Topeka and Santa Fe Railroad; Laird Slough; Calaveras River; San Joaquin River; Stanislaus River; and Tuolumne River.”

This page intentionally left blank.

4 Mitigation Monitoring and Reporting Program

CEQA requires that a reporting or monitoring program be adopted for the conditions of project approval that are necessary to mitigate or avoid significant effects on the environment (Public Resources Code 21081.6). This mitigation monitoring and reporting program is intended to track and ensure compliance with adopted mitigation measures during the project implementation phase. For each mitigation measure recommended in the Final Environmental Impact Report (Final EIR), specifications are made herein that identify the action required, the monitoring that must occur, and the agency or department responsible for oversight.

This page intentionally left blank.

Mitigation Measure	Action Required	Timing	Monitoring Requirements	Responsible Agency
Aesthetic and Visual Resources				
AES-1 (a) Discouragement of Architectural Features that Block Scenic Views				
The implementing agency shall, or can and should, design projects to minimize contrasts in scale and massing between the project and surrounding natural forms and development. Setbacks and acoustical design of adjacent structures shall be preferentially used as mitigation for potential noise impacts arising from increased traffic volumes associated with adjacent land development. The use of sound walls, or any other architectural features that could block views from the scenic highways or other view corridors, shall be discouraged to the extent possible. Where use of sound walls is found to be necessary, walls shall incorporate offsets, accents, and landscaping to prevent monotony. In addition, sound walls shall be complementary in color and texture to surrounding natural features	Confirm that architectural plans, noise walls, and building plans satisfy the design standards, components and materials incorporate offsets, accents, and landscaping to prevent monotony. In addition, confirm sound walls shall be complementary in color and texture to surrounding natural features Confirm structures and walls are constructed consistent with plans.	During project permitting and environmental review.	Site Plan Review and during construction.	Implementing agencies/ project sponsor.
AES-1 (b) Tree Protection and Replacement				
The implementing agency for new roadways, extensions and widenings of existing roadways, trails and facility improvement projects shall, or can and should, avoid the removal of existing mature trees to the extent possible consistent with adopted local City and County policies as applicable. The implementing agency of a particular proposed 2026 RTP/SCS project shall replace any trees lost at a minimum 2:1 basis and incorporate them into the landscaping design for the roadway when feasible, or as required by local or County requirements. The implementing agency also shall ensure the continued vitality of replaced trees through periodic maintenance.	Grading and site plans shall avoid the removal of existing mature trees to the extent possible. Place conditions of approval on project to require tree replacement at a minimum 2:1 ratio. Maintain replacement trees to ensure their success.	During project permitting and environmental review for roadway extensions and widening projects. Monitoring of replacement trees to occur per Lead Agency regulations or as stipulated in project level CEQA mitigation.	Monitor survivability of replacement trees periodically following construction.	Implementing agencies/ project sponsor.
AES-2 (a) Recontouring for Adjacent Landforms				
Where a particular 2026 RTP/SCS project affects adjacent landforms, the local jurisdiction in which the project is located should ensure that recontouring provides a smooth and gradual transition between modified landforms and existing grade. This requirement can be accomplished through the placement of conditions on the project by the implementing agency during the project specific environmental review.	Smooth and gradual transitions between modified landforms and existing structures.	During project permitting and environmental review.	Site Plan Review.	Implementing agencies/ project sponsor.
AES-2 (b) Landscaping for Landform Variation				
The local jurisdiction in which a particular project is located should ensure that associated landscape materials and design enhance landform variation, provide erosion control and blend with the natural setting. This requirement can be accomplished through the placement of conditions on the project by the local jurisdiction during individual environmental review. To ensure compliance with approved landscape plans, the implementing agency should provide a performance security equal to the value of the landscaping/irrigation installation.	Ensure that landscape materials and design enhance landform variation, provide erosion control and blend with natural setting. Confirm structures and walls are constructed consistent with plans.	During project permitting and environmental review.	Site Plan Review and during construction.	Implementing agencies/ project sponsor.
AES-2 (c) Design Measures for Visual Compatibility				
The implementing agency shall, or can and should, require measures that minimize contrasts in scale and massing between the project and surrounding natural forms and developments. Strategies to achieve this include: • Siting or designing projects to minimize their intrusion into important viewsheds; • Avoiding large cuts and fills when the visual environment (natural or urban) would be substantially disrupted; • Ensuring that re-contouring provides a smooth and gradual transition between modified landforms and existing grade; • Developing transportation systems to be compatible with the surrounding environments (e.g., colors and materials of construction material; scale of improvements); • Designing and installing landscaping to add natural elements and visual interest to soften hard edges, as well as to restore natural features along corridors where possible after widening, interchange modifications, re-alignment, or construction of ancillary facilities; and • Designing new structures to be compatible in scale, mass, character, and architecture with existing structures.	Ensure grading plans and landscape plans avoid large cut and fills, provide re-contouring, replace trees, and restore vegetation cover. Confirm that architectural plans and building plans incorporate design compatible with surrounding existing structures.	During project permitting and environmental review.	Once.	Implementing agencies/ project sponsor.

Mitigation Measure	Action Required	Timing	Monitoring Requirements	Responsible Agency
AES-3(a) Roadway and Project Lighting				
The implementing shall, or can and should, minimize roadway lighting to the extent possible, consistent with safety and security objectives, and shall not exceed the minimum height requirements of the local jurisdiction in which the project is proposed. This may be accomplished through the use of back shields, hoods, low intensity lighting, and using as few lights as necessary to achieve the goals of the project. As part of planning, design, and engineering for projects, project sponsors shall ensure that projects proposed near light sensitive uses avoid substantial spillover lighting. Potential design measures include, but are not limited to, the following: • Lighting shall consist of cutoff-type fixtures that cast low-angle illumination to minimize incidental spillover of light into adjacent properties and undeveloped open space. Fixtures that project light upward or horizontally shall not be used. • Lighting shall be directed away from habitat and open space areas adjacent to the project site. • Light mountings shall be downcast, and the height of the poles minimized to reduce potential for backscatter into the nighttime sky and incidental spillover of light onto adjacent private properties and undeveloped open space. Light poles will be 20 feet high or shorter. Luminary mountings shall have non-glare finishes. • Exterior lighting features shall be directed downward and shielded in order to confine light to the boundaries of the subject project. Where more intense lighting is necessary for safety purposes, the design shall include landscaping to block light from sensitive land uses, such as residences.	Confirm that site plans satisfy the lighting requirements listed in the mitigation measure. Confirm lights are installed as described and shown on site plans.	During project permitting and environmental review.	Once during plan review. Once at completion of construction.	Implementing agencies/ project sponsor.
AES-3(b) Glare Reduction Measures				
Implementing agencies shall, or can and should, minimize and control glare from transportation and land use projects near glare-sensitive uses through the adoption of project design features such as: • Creating tree wells in existing sidewalks; • Planting trees along transportation corridors to reduce glare from the sun; • Adding trees in new curb extensions and traffic circles; • Adding trees to public parks and greenways; • Landscaping off-street parking areas, loading areas, and service areas; • Limiting the use of reflective materials, such as metal; • Using non-reflective material, such as paint, vegetative screening, matte finish coatings, and masonry; • Screening parking areas by using vegetation or trees; • Using low-reflective glass; • Complying with applicable general plan policies, municipal code regulations, city or local controls related to glare; and • Tree species planted to comply with this measure shall provide substantial shade cover when mature. Utilities shall be installed underground along these routes wherever feasible to allow trees to grow and provide shade without need for severe pruning.	Confirm that development and building plans satisfy the lighting requirements listed in the mitigation measure. Confirm lights are installed as described and shown on plans.	During project permitting and environmental review.	Once during plan review. Once at completion of construction.	Implementing agencies/ project sponsor.
Agriculture and Forestry Resources				
AG-1 Agricultural Land Impact Avoidance and Minimization				
Implementing agencies shall implement measures, where feasible based on project-and site-specific considerations that include but are not limited to those identified below. • Require project relocation or corridor realignment, where feasible, to avoid Important Farmland, agriculturally zoned land and/or land under Williamson Act contract. • Manage project construction to minimize the introduction of invasive species or weeds that may affect agricultural production on agricultural land adjacent to project sites. Managing project construction may include washing construction equipment before bringing equipment on-site, using certified weed-free straw bales for construction Best Management Practices (BMPs), and other similar measures. • Provide buffers, berms, setbacks, fencing, or other project design measures to protect surrounding agriculture, and to reduce conflict with farming that could result from implementation of transportation improvements and/or development included as a part of the RTP/SCS.	Require project relocation or corridor realignment into project-specific design plans or environmental review. Require use of BMPs to minimize invasive species introduction during construction. Require the use of design features to protect surrounding agriculture. Require acquisition of conservation easements at a minimum 1:1 ratio.	During project permitting and environmental review.	During construction	Implementing agencies/ project sponsor.

Mitigation Measure	Action Required	Timing	Monitoring Requirements	Responsible Agency
• Achieve compensatory mitigation in advance of impacts through purchase or creation of mitigation credits or the implementation of mitigation projects through Regional Advance Mitigation Planning, as deemed appropriate by permitting agencies. • Require acquisition of conservation easements on land in the same jurisdiction, if feasible, and at least equal in quality and size to converted Important Farmland, to offset the loss of Farmland. • Institute new protection of farmland in the project area or elsewhere through the use of long-term restrictions on use, such as 20-year Farmland Security Zone contracts (Government Code Section 51296 et seq.) or 10-year Williamson Act contracts (Government Code Section 51200 et seq.).				
Air Quality				
AQ-2 (a) Application of SJVAPCD Feasible Mitigation Measures				
For all projects, the implementing agency shall incorporate the most recent SJVAPCD feasible construction mitigation measures and/or technologies for reducing inhalable particles based on analysis of individual sites and project circumstances. Additional and/or modified measures may be adopted by SJVAPCD prior to implementation of individual projects under the proposed 2026 RTP/SCS; therefore, the most current list of feasible mitigation measures at the time of project implementation shall be used. The current SJVAPCD feasible mitigation measures include the following (SJVAPCD 2015): • All disturbed areas, including storage piles, which are not being actively utilized for construction purposes, shall be effectively stabilized of dust emissions using water, chemical stabilizer/suppressant, covered with a tarp or other suitable cover or vegetative ground cover. • All land clearing, grubbing, scraping, excavation, land leveling, grading, cut and fill, and demolition activities shall be effectively controlled of fugitive dust emissions utilizing application of water or by presoaking. • When materials are transported off-site, all material shall be covered, or effectively wetted to limit visible dust emissions, and at least six inches of freeboard space from the top of the container shall be maintained. • Following the addition of materials to, or the removal of materials from, the surface of outdoor storage piles, said piles shall be effectively stabilized of fugitive dust emissions utilizing sufficient water or chemical stabilizer/suppressant. • An owner/operator of any site with 150 or more vehicle trips per day, or 20 or more vehicle trips per day by vehicles with three or more axles shall implement measures to prevent carryout and trackout. • Limit the hours of operation of heavy-duty equipment and/or the amount of equipment in use.	Construction plans shall show SJVAPCD standard dust control measures; implementing agency shall ensure implementation.	During project permitting and environmental review. Prior to issuance of grading permits; during construction	Once during plan review; periodically during construction	Implementing agencies/ project sponsor.
AQ-2 (b) Diesel Equipment Emissions Standards				
The implementing agency shall ensure, to the maximum extent technologically, logistically, and economically feasible, that diesel construction equipment meeting the most stringent CARB emissions standards for off-road heavy-duty diesel engines is used (e.g., as of 2026, this would be Tier 4 emission standards). Where the use of the most stringent CARB emissions standards for off-road heavy-duty diesel engines is not feasible, the next lower tier shall be used; where the use of the next lower tier is not feasible, the next lowest tier shall be used.	Construction plans shall ensure that that construction equipment is subject to the CARB Regulation for In-use Off-road Diesel Vehicles and, if feasible, construction equipment meets Tier 4 standards or at least Tier 2 standards with retrofitted Level 3 VDECS, if available; and perform periodic site inspections.	During project permitting. Prior to issuance of grading permits; during construction.	Once during project plan review; periodically during construction	Implementing agencies/ project sponsor.
AQ-2 (c) Electric Construction Equipment				
The implementing agency shall ensure that to the extent feasible, construction equipment utilizes electricity from power poles rather than temporary diesel power generators and/or gasoline power generators.	Construction plans shall ensure that electricity from power poles is used to the extent possible.	During project permitting and during construction	Once during project plan review; periodically during construction	Implementing agencies/ project sponsor.
AQ-3 (a) PM10 Emissions Reduction				
To help reduce regional PM10 emissions, StanCOG, in partnership with SJVAPCD and implementing agencies, shall: a. Support the use of existing air quality and transportation funds and seek additional funds to continue the implementation of the CARB Carl Moyer Program, which is intended to retrofit and replace trucks and locomotives to reduce particulate matter. b. Incentivize the reduction of mobile PM emissions from mobile exhaust and entrained PM sources such as tire wear, brake wear, and roadway dust through funding. c. Hold forums and workshops to encourage land use projects to incorporate transportation demand management (TDM) strategies as part of the project design to reduce the number of vehicular trips across the transportation network. Potential strategies could include ridesharing, carpooling, subsidized public transit, flexible work hours, and parking management measures.	Ensure PM emissions are reduced using measures in this mitigation such as such as continued implementation of CARB.	During construction as applicable.	Periodically during construction	Implementing agencies/ project sponsor.

Mitigation Measure	Action Required	Timing	Monitoring Requirements	Responsible Agency
AQ-3 (b) Long-term Regional Operational Emissions				
Implementing agencies can and should implement long-term operational emissions reduction measures. Such reduction measures include the following: • Require that all interior and exterior architectural coatings for all developments utilize coatings following SJVAPCD Rule 4601, Architectural Coatings. • Increase building envelope energy efficiency standards in excess of applicable building standards and encourage new development to achieve zero net energy use. • Install energy-efficient appliances, interior lighting, and building mechanical systems. Encourage installation of solar panels for new residential and commercial development. • Locate sensitive receptors more than 500 feet of a freeway, 500 feet of urban roads with 100,000 vehicles/day, or rural roads with 50,000 vehicles/day. • Locate sensitive receptors more than 1,000 feet of a major diesel rail service or railyards. Where adequate buffer cannot be implemented, implement the following: ◦ Install air filtration (as part of mechanical ventilation systems or stand-alone air cleaners) to indoor reduce pollution exposure for residents and other sensitive populations in buildings that are close to transportation network improvement projects. ◦ Use air filtration devices rated MERV-13 or higher. • Plant trees and/or vegetation suited to trapping roadway air pollution and/or sound walls between sensitive receptors and the pollution source. The vegetation buffer should be thick, with full coverage from the ground to the top of the canopy Install higher efficacy public street and exterior lighting. • Use daylight as an integral part of lighting systems in buildings. • Use passive solar designs to take advantage of solar heating and natural cooling. • Install light colored “cool” roofs, cool pavements. • Install solar and tankless hot water heaters. • Exclude wood-burning fireplaces and stoves. • Incorporate design measures and infrastructure that promotes safe and efficient use of alternative modes of transportation (e.g., neighborhood electric vehicles, bicycles) pedestrian access, and public transportation use. Such measures may include incorporation of electric vehicle charging stations, bike lanes, bicycle-friendly intersections, and bicycle parking and storage facilities. • Incorporate design measures that promote ride sharing programs (e.g., by designating a certain percentage of parking spaces for ride sharing vehicles, designating adequate passenger loading and unloading and waiting areas for ride sharing vehicles, and providing a web site or message board for coordinating rides). • Incorporate other mitigation measures recommended by SJVAPCD.	Require coatings compliant with SJVAPCD Rule 4601.	During project permitting and environmental review. Periodically during operation.	Once during project-level environmental review; periodically during operation.	Implementing agencies/ project sponsor.
AQ-5 Health Risk Reduction Measures				
Transportation project sponsor agencies shall implement the following measures: • During project-specific design and CEQA review, the potential localized particulate (PM₁₀ and PM_{2.5}) impacts and their health risks shall be evaluated for individual projects. Localized particulate matter concentrations shall be estimated using procedures and guidelines consistent with U.S. EPA 2015’s <i>Transportation Conformity Guidance for Quantitative Hot-Spot Analyses in PM_{2.5} and PM₁₀ Nonattainment and Maintenance Areas</i>. If required based on the project-level hotspot analysis, project-specific mitigation shall be added to the project design concept or scope to ensure that local particulate (PM₁₀ and PM_{2.5}) emissions would not reach a concentration at any location that would cause estimated cancer risk to exceed the SJVAPCD threshold of 20 in one million. Per the U.S. EPA guidance (2015), potential mitigation measures to be considered may include but shall not be limited to: providing a retrofit program for older higher emitting vehicles, anti-idling requirements or policies, controlling fugitive dust, routing traffic away from populated zones and replacing older buses with cleaner buses. These measures can and should be implemented to reduce localized particulate impacts as needed. • Retain a qualified air quality consultant to prepare a health risk assessment (HRA) in accordance with CARB and OEHHA requirements to determine the exposure of nearby residents to TAC concentrations. • If impacts result in increased risks to sensitive receptors above significance thresholds, plant trees and/or vegetation suited to trapping TACs and/or sound walls between sensitive receptors and the pollution source.	Retain air quality consultant to conduct project-level hot spot analysis. Ensure a project-level HRA is prepared by a qualified air quality consultant. Ensure project-level environmental review and site plans incorporate the measures to reduce particulate impacts, as listed in this mitigation measure	During project permitting and environmental review; during construction as applicable; during operation.	Once during project-level environmental review; periodically during construction; following construction, during operation.	Implementing agencies/ project sponsor.

Mitigation Measure	Action Required	Timing	Monitoring Requirements	Responsible Agency
In addition, consistent with the general guidance contained in CARB’s <i>Air Quality and Land Use Handbook</i> (2005) and Technical Advisory <i>on Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways</i> (2017), appropriate and feasible measures shall be incorporated into project building design for land use projects including residential, school and other sensitive uses located within 500 feet (or other appropriate distance as determined by the lead agency) of freeways, heavily travelled arterials, railways and other sources of diesel particulate matter, including roadways experiencing significant vehicle delays. The appropriate measures shall include one or more of the following methods, as applicable and as determined by a qualified professional. The implementing agency shall incorporate health risk reduction measures based on an analysis of individual sites and project circumstances. These measures may include: • Avoid siting new sensitive land uses within 500 feet of a freeway or railway. • Require development projects for new sensitive land uses to be designed to minimize exposure to roadway-related pollutants to the maximum extent feasible through inclusion of design components including air filtration and physical barriers. • Do not locate sensitive receptors near the entry and exit points of a distribution center. • Locate structures and outdoor living areas for sensitive uses as far as possible from the source of emissions. As feasible, locate doors, outdoor living areas and air intake vents primarily on the side of the building away from nearby high volume roadways or other pollution source. As feasible, incorporate dense, tiered vegetation that regains foliage year-round and has a long life span between the pollution source and the project. • Maintain a 50-foot buffer from a typical gas dispensing facility (under 3.6 million gallons of gas per year). • Install, operate, and maintain in good working order a central heating and ventilation (HV) system or other air take system in the building, or in each individual residential unit, that meets the efficiency standard of the MERV 13. The HV system should include the following features: ◦ Installation of a high efficiency filter and/or carbon filter-to-filter particulates and other chemical matter from entering the building. ◦ Use of either HEPA filters or ASHRAE 85 percent supply filters. ◦ Completion of ongoing maintenance. • Retain a qualified HV consultant or Home Energy Rating Systems rater during the design phase of the project to locate the HV system based on exposure modeling from the mobile and/or stationary pollutant sources. • Maintain positive pressure within the building. • Achieve a performance standard of at least one air exchange per hour of fresh outside filtered air. • Achieve a performance standard of at least four air exchanges per hour of recirculation. Achieve a performance standard of 0.25 air exchanges per hour of unfiltered infiltration if the building is not positively pressurized. • Require project owners to provide a disclosure statement to occupants and buyers summarizing technical studies that reflect health concerns about exposure to highway/freeway exhaust emissions.				
Biological Resources				
BIO-1 (a) Biological Resources Screening and Assessment				
The implementing agencies shall, or can and should, implement the following measures during CEQA review of projects implementing the proposed 2026 RTP/SCS. On a project-by-project basis, a preliminary biological resource screening shall be performed to determine whether the project has any potential to impact biological resources. If it is determined that the project has no potential to impact biological resources, no further action is required. If the project would have the potential to impact biological resources, prior to construction, a qualified biologist shall conduct a biological resources assessment (BRA) or similar type of study to document the existing biological resources within the project footprint plus an appropriate buffer determined by a qualified biologist and to determine the potential impacts to those resources. The BRA shall evaluate the potential for impacts to all sensitive biological resources including, but not limited to special-status species, nesting birds, wildlife movement, sensitive plant communities/critical habitat and other resources judged to be sensitive by local, state, and/or federal agencies. Pending the results of the BRA, design alterations, further technical studies (i.e., protocol surveys) and/or consultations with the USFWS, CDFW and/or other local, state, and federal agencies may be required. • Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed, Proposed and Candidate Plants (USFWS 2000)	Ensure preliminary biological resource screening to determine whether the project has any potential to impact biological resources and incorporate measures listed in this mitigation measure if impacts are found. Retain a qualified biologist to conduct a biological resources assessment (BRA) if the project would have potential to impact biological resources.	During project permitting and environmental review.	Once.	Implementing agencies/ project sponsor.

Mitigation Measure	Action Required	Timing	Monitoring Requirements	Responsible Agency
• Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities (CDFW 2018) • Survey Considerations for CESA Candidate Bumble Bee Species (CDFW 2023) • Interim Survey Guidelines to Permittees for Recovery Permits under Section 10(a)(1)(A) of the Endangered Species Act for the Listed Vernal Pool Branchiopods (USFWS 1996) • Revised Guidance on Site Assessment and Field Surveys for the California Red-legged Frog (USFWS 2005) • Interim Guidance on Site Assessment and Field Surveys for Determining Presence or a Negative Finding of the California Tiger Salamander (USFWS and CDFW 2003) • Considerations for Conserving the Foothill Yellow-legged Frog (CDFW 2018) • Visual Encounter Survey Protocol for Rana Boylii in Lotic Environments (University of California, Davis 2017) • Draft USGS Western Pond Turtle (Emys marmorata) Visual Survey Protocol for the Southcoast Ecoregion (U.S. Geological Survey 2006) • Interim Golden Eagle Inventory and Monitoring Protocols; and Other Recommendations (USFWS 2010) • Swainson's Hawk Survey Protocols, Impact Avoidance, and Minimization Measures for Renewable Energy Projects in the Antelope Valley of Los Angeles and Kern Counties, California (California Energy Commission and CDFW 2010) • Staff Report on Burrowing Owl Mitigation (CDFW 2012). • Standardized Recommendations for Protection of the San Joaquin Kit Fox Prior to or During Ground Disturbance (USFWS 1999) • Bat surveys consistent with CDFW recommendations The following Mitigation Measures [BIO-1(b) through BIO-1(i)] shall be incorporated, only as applicable, into the BRA and/or the project CEQA document for projects where specific resources are present, or may be present, and may be impacted by the project. Note that specific surveys described in the mitigation measures below may be completed as part of the BRA where suitable habitat is present.				
BIO-1(b) Special-Status Plant Species Surveys				
If completion of the project-specific biological resources assessment determines that special-status plant species have potential to occur on-site, the implementing agency shall contract a qualified biologist to complete surveys for special-status plants prior to any vegetation removal, grubbing, or other construction activity of each project (including staging and mobilization). The surveys shall be floristic in nature and shall be seasonally timed to coincide with the target species identified in the project-specific BRA. Whenever practicable, surveys shall be conducted in accordance with the most current protocols established by the CDFW, USFWS, and the local jurisdictions if said protocols exist. A report of the survey results shall be submitted to the implementing agency for review. If special-status plant species are identified, mitigation measure BIO-1(c) shall apply.	If there is a potential for special-status plant species to occur on site, surveys for special status plants shall be completed. Ensure a report of the survey is provided to the implementing agency for review.	During project permitting and environmental review; prior to construction but no earlier than one year before construction commences.	Once.	Implementing agencies/ project sponsor.
BIO-1(c) Special-Status Plant Species Avoidance, Minimization, and Mitigation				
If state or federally listed and/or CRPR 1 and 2 species are found during special-status plant surveys [pursuant to mitigation measure BIO-1(b)], then the implementing agency shall redesign the project to avoid impacting these plant species to the maximum extent feasible. Occurrences of these species that are not within the immediate disturbance footprint but are located within 50 feet of disturbance limits shall have bright orange protective fencing installed at least 30 feet beyond their extent, or other distance as approved by a qualified biologist, to protect them from harm. If CRPR 3 and 4 species are found, the qualified biologist contracted to conduct the plant surveys [pursuant to mitigation measure BIO-1(b)] shall evaluate to determine if they meet criteria to be considered special-status, and if so, the same process as identified for CRPR 1 and 2 species shall apply. If special-status plants species cannot be avoided and would be impacted by a project implemented under the proposed 2026 RTP/SCS, the implementing agency shall require all impacts to be mitigated at an appropriate ratio to fully offset project impacts, as determined by a qualified biologist for each species as a component of habitat restoration. A restoration plan shall be prepared and submitted to the implementing agency. The implementing agency shall obtain all necessary regulatory permits for impacts to state listed, state candidate, federally listed and/or plants listed as rare under the Native Plant Protection Act, as applicable, prior to any vegetation or ground-disturbing activities.	Ensure redesign of the project to avoid impacting rare plant species if state or federally listed and/or CRPR 1 and 2 species are found. Ensure biologist evaluates CRPR 3 and 4 species to determine whether special-status. If avoidance is not possible, mitigation to fully offset project impacts shall be required pursuant to a qualified biologist. Ensure a restoration plan be developed for the project.	During project permitting and environmental review; prior to issuance of project construction permits and approvals.	Once.	Implementing agencies/ project sponsor.

Mitigation Measure	Action Required	Timing	Monitoring Requirements	Responsible Agency
BIO-1(d) Endangered/Threatened Animal Species Habitat Assessment and Protocol Surveys				
If the results of the BRA determine that suitable habitat may be present for federally and/or state endangered or threatened animal species, the implementing agency shall require habitat assessments/surveys. Whenever practicable the surveys shall be completed in accordance with CDFW and/or USFWS/NMFS protocols prior to issuance of any construction permits/project approvals. Alternatively, in lieu of conducting protocol surveys, the implementing agency may choose to assume presence within the project footprint and proceed with development of appropriate avoidance measures, consultation, and permitting, as applicable. If the target species is detected during protocol surveys, or protocol surveys are not conducted and presence assumed based on suitable habitat, mitigation measure BIO-1(e) shall apply	If suitable habitat for federally and/or state endangered or threatened animal species exists, protocol habitat assessments/surveys shall be completed in accordance with CDFW and/or USFWS/MNFS protocols.	During project permitting and environmental review; prior to commencement of project construction.	Once.	Implementing agencies/ project sponsor.
BIO-1 (e) Endangered/Threatened Animal Species Avoidance and Compensatory Mitigation				
If habitat is occupied or presumed occupied by federal and/or state listed or candidate species and would be impacted by the project, the implementing agency shall redesign the project in coordination with a qualified biologist to avoid impacting occupied/presumed occupied habitat to the extent feasible. If occupied or presumed occupied habitat cannot be avoided, the implementing agency shall estimate the total acreages for habitat that would be impacted prior to the issuance of construction permits/approvals. Compensatory mitigation shall be achieved through purchase of credits at a USFWS, NMFS and/or CDFW approved conservation bank if available for the affected species, and/or through providing compensatory mitigation to offset impacts to federal and/or state listed or candidate species habitat. Compensatory mitigation shall be provided at an appropriate ratio to fully offset project impacts, as determined by a qualified biologist for permanent impacts. Compensatory mitigation may be combined/nested with special-status plant species and sensitive community restoration where applicable. Temporary impact areas shall be restored to pre-project conditions. If on and/or off-site compensatory mitigation sites are identified, the implementing agency shall retain a qualified biologist to prepare a Habitat Mitigation and Monitoring Plan (HMMP) to ensure the success of compensatory mitigation sites that are to be conserved for compensation of permanent impacts to federal and/or state listed or candidate species. The HMMP shall identify long term site management needs, routine monitoring techniques, techniques, and success criteria, and shall determine if the conservation site has restoration needs to function as a suitable mitigation site. If restoration is required on the conservation site, the HMMP shall contain the restoration components outlined under the Restoration Plan listed in measure BIO-1(c). The HMMP shall be submitted to the implementing agency for review and approval. The implementing agency shall obtain all necessary regulatory permits for impacts to state listed, state candidate, federally listed animal species, prior to any vegetation- or ground-disturbance, or other activities which could disturb the species.	If habitat is occupied by federal and/or state listed species, implementing agency shall require project plans include project-specific mitigation measures to avoid and minimize impacts to habitat for endangered or threatened species. If avoidance is not possible, credits shall be purchased according to the mitigation measure, and a qualified biologist must provide a HMMP.	During project permitting and environmental review; prior to issuance of construction permits and approvals.	In accordance with project HMMP, as applicable.	Implementing agencies/ project sponsor.
BIO-1(f) Endangered/Threatened and Candidate Species Avoidance and Minimization During Construction				
The implementing agency shall apply the following measures to aquatic and terrestrial species, where appropriate. Implementing agencies shall select from these measures as appropriate depending on site conditions, the species with potential for occurrence and the results of the biological resources screening and assessment (Measure BIO-1[a]). • Preconstruction surveys for federal and/or state listed species with potential to occur shall be conducted where suitable habitat is present by a qualified biologist not more than 48 hours prior to the start of construction activities. The survey area shall include the proposed disturbance area and all proposed ingress/egress routes, plus a 100-foot buffer. If any life stage of federal and/or state listed species is found within the survey area, the qualified biologist shall recommend an appropriate course of action, which may include consultation with USFWS, NMFS and/or CDFW. The results of the pre-construction surveys shall be submitted to the implementing agency for review and approval prior to start of construction. • Ground disturbance shall be limited to the minimum necessary to complete the project. The project limits of disturbance shall be flagged. Areas of special biological concern shall have highly visible orange construction fencing. • All projects occurring within/adjacent to aquatic habitats (including riparian habitats and wetlands) shall be completed between April 1 and October 31, to avoid impacts to sensitive aquatic species. • All projects occurring within or adjacent to sensitive habitats that may support federally and/or state endangered/threatened species shall have a qualified biologist present during all initial ground disturbing/vegetation clearing activities. Once initial ground disturbing/vegetation clearing activities have been completed, said biologist shall conduct daily pre-activity clearance surveys for endangered/threatened species. Alternatively, and upon approval of the	If applicable, project plans shall include project-specific mitigation measures to avoid and minimize impacts to endangered or threatened species. Implement the plans preconstruction and during construction of the project, and post construction monitoring as required.	During project permitting and environmental review; prior to and ongoing throughout project construction.	Periodically through construction.	Implementing agencies/ project sponsor.

Mitigation Measure	Action Required	Timing	Monitoring Requirements	Responsible Agency
CDFW and/or USFWS/NMFS or as outlined in project permits, said biologist may conduct site inspections at a minimum of once per week to ensure all prescribed avoidance and minimization measures are begin fully implemented. • No endangered/threatened species shall be captured and relocated without authorization from the CDFW and/or USFWS. • If pumps are used for dewatering activities, all intakes shall be completely screened with wire mesh not larger than five millimeters to prevent animals from entering the pump system. • If at any time during construction of the project an endangered/threatened species enters the construction site or otherwise may be impacted by the project, all project activities shall cease. At that point, a qualified biologist shall recommend an appropriate course of action, which may include consultation with USFWS, NMFS and/or CDFW. • All vehicle maintenance/fueling/staging shall occur not less than 100 feet from any riparian habitat or water body. Suitable containment procedures shall be implemented to prevent spills. • No equipment shall be permitted to enter wetted portions of any affected drainage channel. • All equipment operating within streambeds (restricted to conditions in which water is not present) shall be in good conditions and free of leaks. Spill containment shall be installed under all equipment staged within stream areas and extra spill containment and clean up materials shall be located in close proximity for easy access. • At the end of each workday, excavations shall be secured with a cover, or a ramp shall be provided to prevent wildlife entrapment. • All trenches, pipes, culverts, or similar structures shall be inspected for animals prior to burying, capping, moving, or filling.				
BIO-1(g) Non-Listed Special-status Animal Species Avoidance and Minimization				
Depending on the species identified in the BRA, the implementing agency shall select from among the following to reduce the potential for impacts to non-listed special-status animal species:	If applicable, project plans shall include project-specific mitigation measures to reduce impacts to non-listed special status species.	During project permitting and environmental review; prior to, during and after project construction.	During all initial ground disturbance, as applicable.	Implementing agencies/ project sponsor.
• Pre-construction clearance surveys shall be conducted within 14 days prior to the start of construction (including staging and mobilization) to identify all special-status animal species that may occur on-site. All non-listed special-status species shall be relocated from the site. A report of the pre-construction survey shall be submitted to the implementing agency for their review and approval prior to the start of construction. • A qualified biologist shall be present during all initial ground disturbing activities, including vegetation removal, to recover special-status animal species unearthed by construction activities. • Upon completion of the project, a qualified biologist shall prepare a final compliance report documenting all compliance activities implemented for the project, including the pre-construction survey results.				
BIO-1(h) Preconstruction Surveys for Nesting Birds				
The implementing agencies shall, or can and should, implement the following measures during CEQA review of projects implementing the proposed 2026 RTP/SCS. For construction activities occurring during the nesting season (generally February 1 to September 15), surveys for nesting birds covered by the CFGC, the MBTA, and Bald and Golden Eagle Protection Act shall be conducted by a qualified biologist no more than 10 days prior to vegetation removal activities. A qualified biologist shall conduct preconstruction surveys for raptors. The survey for the presence of bald and golden eagles shall cover all areas within of the disturbance footprint plus a one-mile buffer where access can be secured. The survey area for all other nesting bird and raptor species shall include the disturbance footprint plus a 300-foot and 500-foot buffer, respectively. If active nests (nests with eggs or chicks) are located, the qualified biologist shall establish an appropriate avoidance buffer based on the species biology and the current and anticipated disturbance levels occurring in vicinity of the nest. If the buffer for non-listed passerines is less than 250ft, or 500 ft for non-listed raptors, the biologist shall monitor the nest for signs of disturbance and normal baseline behavior during the first day of construction. If the individuals show signs of disturbance, such as scolding, flushing, or hesitating when returning to the nest, the buffer shall be increased. All buffers shall be marked using high visibility flagging or fencing, and, unless approved by the qualified biologist, no construction activities shall be allowed within the buffers until the qualified biologist has verified that young have fledged from the nest, or the nest fails. For bald or golden eagle nests identified during the preconstruction surveys, an avoidance buffer of up to one mile shall be established on a case-by-case basis in consultation with the USFWS and CDFW. The size of the buffer may be influenced by the existing conditions and disturbance regime, relevant landscape characteristics, and the nature, timing, and duration of the expected disturbance. The buffer shall be established between February 1 and September 15;	If applicable, a survey for nesting birds shall be completed; if necessary, a buffer shall be created.	During project permitting and environmental review; prior to construction activities; during construction activities if required. ornithologist determines a given nest has failed.	Once prior to construction; as needed during construction activities.	Implementing agencies/ project sponsor.

Mitigation Measure	Action Required	Timing	Monitoring Requirements	Responsible Agency
however, buffers may be relaxed earlier than September 15 if a qualified ornithologist determines that a given nest has failed or that all surviving chicks have fledged, and the nest is no longer in use. A report of these preconstruction nesting bird surveys and nest monitoring (if applicable) shall be submitted to the implementing agency for review and approval prior to the start of construction.				
BIO-1 (i) Worker Environmental Awareness Program				
Prior to initiation of construction activities (including staging and mobilization), all personnel associated with project construction shall attend Worker Environmental Awareness Program training, conducted by a qualified biologist retained by the implementing agency, to aid workers in recognizing special-status resources and review of the limits of construction and mitigation measures required. A fact sheet conveying this information shall also be prepared for distribution to all contractors, their employers, and other personnel involved with construction of the project. All employees shall sign a form documenting that they have attended the training and understand the information presented to them.	Construction personnel shall attend WEAP training prior to working on the project and receive a fact sheet. Fact sheet to be made available at the project site.	Prior to start of construction and as new construction staff start working on project.	Once prior to construction.	Implementing agencies/ project sponsor.
BIO-2(a) Aquatic Resources Jurisdictional Delineation and Impact Avoidance				
The implementing agencies shall, or can and should, implement the following measures during CEQA review of projects implementing the proposed 2026 RTP/SCS. If the results of measure BIO-1(a) indicates projects implemented under the proposed 2026 RTP/SCS occur within or adjacent to wetland, drainages, riparian habitats, or other areas that may fall under the jurisdiction of the CDFW, USACE, and/or RWQCB, a qualified biologist shall complete an aquatic resources delineation in accordance with the requirement set forth by each agency. The result shall be submitted to the implementing agency, USACE, RWQCB, and/or CDFW, as appropriate, for review and approval, and the project shall be designed to avoid and minimize impacts to jurisdictional areas to the extent feasible. The delineation shall serve as the basis to identify potentially jurisdictional areas to be protected during construction, through implementation of the avoidance and minimization identified in measure BIO-2(f).	If applicable, a jurisdictional delineation shall be completed and submitted to the applicable agencies listed in this mitigation measure.	During project permitting and environmental review.	Once.	Implementing agencies/ project sponsor.
BIO-2(b) Wetland, Drainages, and Riparian Habitat Restoration				
The implementing agencies shall, or can and should, implement the following measures during CEQA review of projects implementing the proposed 2026 RTP/SCS. Unavoidable impacts to jurisdictional wetlands, drainages, and riparian habitat shall be mitigated at an appropriate ratio to fully offset project impacts, as determined by a qualified biologist retained by the implementing agency and shall occur on-site or as close to the impacted habitat as possible. A mitigation and monitoring plan consistent with regulatory agency requirements shall be developed by a qualified biologist and submittal to the regulatory agency overseeing the project for approval. Alternatively, mitigation shall be accomplished through purchase of credits from an approved wetlands mitigation bank.	Ensure, if applicable, project plans mitigate impacts to jurisdictional wetlands and riparian habitats at a ratio to fully offset project impacts, as determined by a qualified biologist. Ensure a mitigation and monitoring plan is developed be developed by a qualified biologist.	During project permitting and environmental review.	Once.	Implementing agencies/ project sponsor.
BIO-2(c) Landscaping Plan				
If landscaping is proposed for a specific project, a qualified biologist/landscape architect retained by the implementing agency shall prepare a landscape plan. Drought tolerant, locally native plant species shall be used. Noxious, invasive and/or non-native plant species that are recognized on the Federal Noxious Weed List, California Noxious Weeds List and/or California Invasive Plant Council Inventory shall not be permitted. Species selected for planting shall be regionally appropriate native species that are known to occur in the adjacent native habitat types.	Retain a qualified biologist/landscape architect, if applicable, to prepare a landscaping plan that includes all requirements in this mitigation measure; species shall be regionally appropriate native species found in adjacent native habitats.	During project permitting and environmental review.	Once.	Implementing agencies/ project sponsor.
BIO-2(d) Sensitive Natural Community Avoidance and Mitigation				
If the results of Mitigation Measure BIO-1(a) indicates projects implemented under the proposed 2026 RTP/SCS would impact sensitive natural communities, the implementing agency shall avoid impacts to sensitive natural communities through final project design modifications if feasible. If the implementing agency determines that sensitive natural communities cannot be avoided, impacts shall be mitigated on-site or offsite at an appropriate ratio to fully offset project impacts, as determined by a qualified biologist based on any applicable resource agency guidelines. Temporarily impacted areas shall be restored to pre project conditions. A Restoration Plan shall be developed by a qualified biologist and submitted to the implementing agency for approval. Mitigation for impacts to sensitive natural communities can be developed and included in the HMMP defined under Mitigation Measure BIO-1(e) above, if applicable. The mitigation and monitoring plan shall identify long term site management needs, routine monitoring techniques, techniques and success criteria.	If applicable, project plans shall include final project design modifications shall be developed to avoid impacts to sensitive vegetation communities. If avoidance is not possible, impacts shall be mitigated at a ratio to fully offset project impacts, as determined by a qualified biologist. Ensure temporarily impacted areas are restored to pre-project conditions. Ensure a qualified biologist develops a Restoration Plan.	During project permitting and environmental review.	Once following construction and then, when applicable, in accordance with the Restoration Plan.	Implementing agencies/ project sponsor.

Mitigation Measure	Action Required	Timing	Monitoring Requirements	Responsible Agency
BIO-2(e) Invasive Weed Prevention and Management Program				
Prior to start of construction for each project that occurs within or adjacent to native habitats, an Invasive Weed Prevention and Management Program shall be developed by a qualified biologist retained by the implementing agency to prevent invasion of native habitat by non-native plant species. The plan shall be submitted to the implementing agency for review and approval. A list of target species shall be included, along with measures for early detection and eradication. The plan, which shall be implemented by the implementing agency, shall also include, but not be limited to, the following measures to prevent the introduction of invasive weed species: • During construction, limit the use of imported soils for fill. If the use of imported fill material is necessary, the imported material must be obtained from a source that is known to be free of invasive plant species. • To minimize colonization of disturbed areas and the spread of invasive species, the contractor shall stockpile topsoil and redeposit the stockpiled soil after construction or transport the topsoil to a permitted landfill for disposal. • All erosion control materials, including straw bales, straw wattles, or mulch used on-site must be free of invasive species seed. • Exotic and invasive plant species shall be excluded from any erosion control seed mixes and/or landscaping plant palettes associated with the proposed project. • All disturbed areas shall be hydroseeded with a mix of locally native species upon completion of work in those areas.	Retain a qualified biologist to develop an Invasive Weed Prevention and Management Program if project is in or next to native habitats.	During project permitting and environmental review; prior to construction activities; during construction activities.	Once prior to construction; ongoing during construction.	Implementing agencies/ project sponsor.
BIO-2(f) Wetlands, Drainages, and Riparian Habitat Best Management Practices During Construction				
The following best management practices shall be required by the implementing agency for development within or adjacent to wetlands, drainages, or riparian habitat: • Access routes, staging and construction areas shall be limited to the minimum area necessary to achieve the project goal and minimize impacts to other waters including locating access routes and ancillary construction areas outside of jurisdictional areas. • To control sedimentation during and after project implementation, appropriate erosion control materials shall be deployed to minimize adverse effects on jurisdictional areas in the vicinity of the project. • Project activities within the jurisdictional areas should occur during the dry season (typically between June 1 and November 1) in any given year, or as otherwise directed by the regulatory agencies. • During construction, no litter or construction debris shall be placed within jurisdictional areas. All such debris and waste shall be picked up daily and properly disposed of at an appropriate site. • Raw cement, concrete, or washings thereof, asphalt, paint or other coating material, oil or other petroleum products, or any other substances which could be hazardous to aquatic species resulting from project related activities, shall be prevented from contaminating the soil and/or entering wetlands, drainages, or riparian habitat. • All refueling, maintenance and staging of equipment and vehicles shall occur at least 100 feet from bodies of water and in a location where a potential spill would not drain directly toward aquatic habitat (e.g., on a slope that drains away from the water source). Prior to the onset of work activities, a plan must be in place for prompt and effective response to any accidental spills.	If applicable, ensure project plans incorporate the best management practices listed in this mitigation measure.	During project permitting and environmental review; prior to construction activities; during construction activities.	Once prior to construction; ongoing during construction.	Implementing agencies/ project sponsor.
BIO-3(a) Project Design for Wildlife Connectivity				
All projects including long segments of fencing and lighting shall be designed to minimize impacts to wildlife. Where fencing or other project components is required for public safety concerns, these project components shall be designed to permit wildlife movement by incorporating design features such as: • A minimum 16 inches between the ground and the bottom of the fence to provide clearance for small animals; • A minimum 12 inches between the top two wires, or top the fence with a wooden rail, mesh, or chain link instead of wire to prevent animals from becoming entangled; • If privacy fencing is required near open space areas, openings at the bottom of the fence measure at least 16 inches in diameter shall be installed at reasonable intervals to allow wildlife movement, or the fence may be installed with the bottom at least 16 inches above the ground level; • If fencing or other project components must be designed in such a manner that wildlife passage would not be permitted, wildlife crossing structures shall be incorporated into the project design as appropriate;	Project plans for projects with fencing and lighting shall be designed to minimize impacts to wildlife. Project plans shall incorporate wildlife crossing structures when a crossing is applicable.	During project permitting and environmental review.	Once.	Implementing agencies/ project sponsor.

Mitigation Measure	Action Required	Timing	Monitoring Requirements	Responsible Agency
• Wildlife-friendly fencing shall be designed to deter wildlife from crossing over roads and other infrastructure and to reduce wildlife vehicle collisions during the wet and dry seasons. • Culverts shall be maintained to be free of sediment and vegetation to ensure continued functionality for wildlife passage; • Project designs shall incorporate terracing to facilitate terrestrial species movement where space allows; • Culverts shall be upsized where appropriate to support passage of impacted species and utilize designs that still allow light penetration; • Crossing structures shall incorporate bench designs where feasible to allow wildlife use of the crossings during flooding, and include smaller animal escape areas within or adjacent to the wildlife crossing; • Lighting installed as part of any project shall be designed to be minimally disruptive to wildlife (see mitigation measure AES-3(a) Roadway Lighting for lighting requirements). • Vegetative buffers, consisting of California native plant and tree species, shall be installed where feasible to provide a natural noise barrier between roadway projects and sensitive wildlife habitat, including movement corridors. The buffer shall be maintained in perpetuity to ensure noise levels from the roadway are minimized within adjacent sensitive habitat. • Project design elements shall take into account the recommendations in the Caltrans Wildlife Crossings Design Manual, the CDFW Wildlife Action Plan, and the Federal Highway Administration Wildlife Crossing Structure Handbook, in determining the best approach to project design and need for post construction monitoring to evaluate effectiveness. In addition, prior to design approval, implementing agencies shall conduct wildlife movement assessments to evaluate connectivity constraints and identify opportunities to maintain or enhance wildlife movement. Post-construction monitoring shall be conducted, where feasible, to confirm wildlife use of implemented movement features and to identify any needed adaptive management. When on-site design measures cannot fully reduce impacts, compensation shall be considered as a mitigation option, including but not limited to participation in mechanisms authorized under SB 790, to reduce unavoidable connectivity impacts at a landscape scale. If the wildlife movement assessment determines that a project could substantially interfere with an identified regional or locally important wildlife movement corridor, habitat linkage, movement bottleneck, drainage used for wildlife passage, existing or planned wildlife crossing, or other location important to maintaining wildlife connectivity, the implementing agency shall coordinate with the appropriate CDFW regional staff during development of the project's connectivity design measures.				
BIO-3 (b) Maintain Connectivity in Drainages				
No permanent structures shall be placed within any drainage or river that would impede wildlife movement (i.e., no hardened caps or other structures in the stream channel perpendicular to stream flow be left exposed or at depth with moderate to high risk for exposure as a result of natural bed scour during high flow events and thereby potentially create impediments to passage). In addition, upon completion of construction within any drainage, areas of stream channel and banks that are temporarily impacted shall be returned to pre-construction contours and in a condition that allows for unimpeded passage through the area once the work has been completed. If water is to be diverted around work sites, a diversion plan shall be submitted to StanCOG and/or local jurisdiction for review and approval prior to issuance of project construction permits/approvals. The diversion shall be designed in a way as to not impede movement while the diversion is in place. For projects affecting drainages that serve as wildlife movement corridors, implementing agencies shall complete preconstruction evaluations of species movement patterns to guide placement, design, and timing of work. Post construction monitoring shall be conducted, where feasible, to verify that drainage related movement remains functional and to inform adaptive management if needed.	Ensure construction plans and building plans avoid placement of permanent structures in drainages or rivers such that wildlife movement would be impeded. Ensure impacts to stream channels are restored. If applicable, ensure a diversion plan is provided for the project.	During project permitting and environmental review. Ensure temporary impacts to stream channels are restored after construction is completed.	Once; follow up as needed.	Implementing agencies/ project sponsor.

Mitigation Measure	Action Required	Timing	Monitoring Requirements	Responsible Agency
BIO-3 (c) Construction Best Management Practices to Minimize Disruption to Wildlife				
The following construction best management practices shall be incorporated by the implementing agency into all grading and construction plans to minimize temporary disruption of wildlife, which could hinder wildlife movement: Designation of a 20 mile per hour speed limit in all construction areas. • Designation of a 20 mile per hour speed limit in all construction areas. • Daily construction work schedules shall be limited to daylight hours only. • Mufflers shall be used on all construction equipment and vehicles shall be in good operating condition. • All trash shall be placed in sealed containers and shall be removed from the project site a minimum of once per week. • No pets are permitted on project site during construction.	Ensure construction plans incorporate best management practices to minimize disruption to wildlife.	During project permitting and environmental review; prior to issuance of grading and construction permits.	Periodically during construction	Implementing agencies/ project sponsor.
Cultural Resources				
CUL-1 Built Environment Historical Resources				
Prior to the issuance of an individual project permit, the implementing agency of a 2026 RTP/SCS project involving a building or structure over 45 years of age shall prepare a map defining the project area. This map shall indicate the areas of disturbance associated with construction and operation of the facility and will help in determining whether known and potential historical resources are located within the project area. If a building or structure greater than 45 years in age is within the identified impact zone, a survey and evaluation of the building(s) and/or structure(s) to determine their eligibility for recognition under State, federal, or local historic resource designation criteria shall be conducted. The evaluation shall be prepared by an architectural historian or historical architect meeting the Secretary of the Interior’s Standards and Guidelines for Archeology and Historic Preservation, Professional Qualification Standards (PQS) as defined in 36 CFR Part 61. All buildings and structures 45 years of age or older within the project area shall be evaluated in their historic context and documented in a report meeting the State Office of Historic Preservation guidelines. All evaluated properties shall be documented on Department of Parks and Recreation Series 523 Forms. The report shall be submitted to the implementing agency for review and concurrence. If historical resources are identified within the project area of a proposed development, efforts shall be made to the extent feasible to ensure that impacts are mitigated. Application of mitigation shall generally be overseen by a qualified architectural historian or historic architect meeting the PQS, unless unnecessary in the circumstances (e.g., preservation in place). In conjunction with any development application that may affect the historical resource, a report identifying and specifying the treatment of character-defining features and construction activities shall be provided to the implementing agency for review. To the greatest extent possible to ensure that the relocation, rehabilitation, or alteration of the resource is consistent with the Secretary of the Interior’s Standards for the Treatments of Historic Properties (Standards). In accordance with CEQA, a project that has been determined to conform with the Standards generally would not cause a significant adverse direct or indirect impact to historical resources (14 CCR § 15126.4(b)(1)). Application of the Standards shall be overseen by a qualified architectural historian or historic architect meeting the PQS. In conjunction with any development application that may affect the historical resource, a report identifying and specifying the treatment of character-defining features and construction activities shall be provided to the implementing agency for review and concurrence. If significant historical resources are identified on a development site and compliance with the Standards and/or avoidance is not possible, appropriate site-specific mitigation measures shall be established and undertaken. Mitigation measures may include documentation of the historical resource in the form of a Historic American Building Survey-Like report. The report shall comply with the Secretary of the Interior’s Standards for Architectural and Engineering Documentation and shall generally follow the HABS Level III requirements, including digital photographic recordation, detailed historic narrative report, and compilation of historic research. The documentation shall be completed by a qualified architectural historian or historian who meets the PQS and submitted to the implementing agency prior to issuance of any permits for demolition or alteration of the historical resource. Copies of the report shall be provided to a local library and/or other appropriate repositories.	Prepare a map defining the Area of Potential Effects. Retain an architectural historian, or historical architect, to determine eligibility of structure for recognition under state, federal, or local historic preservation criteria, if applicable.	During project permitting and environmental review.	Once.	Implementing agencies/ project sponsor.

Mitigation Measure	Action Required	Timing	Monitoring Requirements	Responsible Agency
CUL-2(a) Archaeological Resources Impact Minimization				
Before construction activities, implementing agencies shall, or can and should, retain a qualified archaeologist to conduct a record search at the Northwest Information Center to determine whether the project area has been previously surveyed and whether resources were identified. When recommended by the Information Center, implementing agencies shall, or can and should, retain a qualified archaeologist to conduct archaeological surveys before construction activities. Implementing agencies shall, or can and should, follow recommendations identified in the survey, which may include, but would not be limited to subsurface testing, designing, and implementing a Worker Environmental Awareness Program (WEAP), construction monitoring by a qualified archaeologist, avoidance of sites and preservation in place, and/or data recovery if avoidance is not feasible. Recommended mitigation measures shall be consistent with <i>State CEQA Guidelines</i> Section 15126.4(b)(3) recommendations and may include but not be limited to preservation in place and/or data recovery. All cultural resources work shall follow accepted professional standards in recording any find including submittal of standard DPR Primary Record forms (Form DPR 523) and location information to the appropriate California Historical Resources Information System office for the project area.	Retain a qualified archaeologist to conduct a record search to determine whether the project area has been previously surveyed and whether resources were identified. Implement recommendations identified in the survey. Project construction plans shall include required components to stop work if archaeological resources are uncovered.	During project permitting and environmental review; prior to construction activities; during construction activities.	Ongoing throughout construction.	Implementing agencies/ project sponsor.
CUL-2(b) Unanticipated Discoveries During Construction				
During construction activities, implementing agencies shall, or can and should, implement the following measures. If evidence of any prehistoric or historic-era subsurface archaeological features, deposits or tribal cultural resources are discovered during construction-related earthmoving activities (e.g., ceramic shard, trash scatters, lithic scatters), all ground-disturbing activity proximate to the discovery shall be halted until a qualified archaeologist (36 CFR Section 61) can assess the significance of the find. If the find is a prehistoric archaeological site, the appropriate Native American group shall be notified. If the archaeologist determines that the find does not meet the CRHR standards of significance for cultural resources, construction may proceed. If the archaeologist determines that further information is needed to evaluate significance, a testing plan shall be prepared and implemented. If the find is determined to be significant by the qualified archaeologist (i.e., because the find is determined to constitute either an historical resource or a unique archaeological resource), the archaeologist shall work with the implementing agency to avoid disturbance to the resources, and if complete avoidance is not feasible in light of project design, economics, logistics and other factors, shall recommend additional measures such as the preparation and implementation of a data recovery plan. All cultural resources work shall follow accepted professional standards in recording any find including submittal of standard DPR Primary Record forms (Form DPR 523) and location information to the appropriate California Historical Resources Information System office for the project area. If the find is a prehistoric archaeological site, the culturally affiliated California Native American tribe shall be notified and afforded the opportunity to monitor mitigative treatment. During evaluation or mitigative treatment, ground disturbance and construction work could continue in other parts of the project area that are distant enough from the find not to impact it, as determined by the qualified archaeologist.	Place conditions of approval on project to ensure that if archaeological resources are uncovered work is halted until the procedures described in this mitigation measure have been completed.	During project permitting and environmental review; prior to construction activities; during construction activities.	Ongoing throughout construction.	Implementing agencies/ project sponsor.
Geology and Soils				
GEO -5 Paleontological Resources Impact Minimization				
The implementing agency of a 2026 RTP/SCS project involving ground disturbing activities (including grading, trenching, foundation work and other excavations) shall retain a qualified paleontologist, defined as a paleontologist who meets the Society of Vertebrate Paleontology (SVP) standards for Qualified Professional Paleontologist (SVP 2010), to conduct a Paleontological Resources Assessment (PRA). The PRA shall determine the age and paleontological sensitivity of geologic formations underlying the proposed disturbance area, consistent with SVP Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources (SVP 2010) guidelines for categorizing paleontological sensitivity of geologic units within a project area. If underlying formations are found to have a high potential (sensitivity) for paleontological resources, the following measures shall apply: • Avoidance. Avoid routes and project designs that would permanently alter unique paleontological and geological features. If avoidance practices cannot be implemented, the following measures shall apply. • Paleontological Mitigation and Monitoring Reporting Program. A Qualified Paleontologist shall prepare a Paleontological Resources Monitoring and Mitigation Program to be implemented during ground disturbance activity. This program shall outline the procedures for construction staff training, paleontological monitoring extent and duration (i.e., in what locations and at what depths paleontological monitoring shall be required), salvage and preparation of fossils, the final mitigation and monitoring report and paleontological staff qualifications. • Paleontological Worker Environmental Awareness Program (WEAP). Prior to the start of ground disturbance activity, construction personnel shall be informed on the appearance of fossils and the procedures for notifying paleontological staff should fossils be discovered by construction staff.	Retain a qualified paleontologist to conduct a PRA. Place conditions of approval on project to ensure procedures described in this mitigation measure are completed before and throughout construction, if the project area is underlying high sensitivity or unique geologic features.	During project permitting and environmental review; prior to construction activities; during construction activities.	Ongoing throughout construction.	Implementing agencies/ project sponsor.

Mitigation Measure	Action Required	Timing	Monitoring Requirements	Responsible Agency
• Paleontological Monitoring. Ground disturbing activity with the potential to disturb geologic units with high paleontological sensitivity, as determined by initial paleontological surveying or records search as deemed appropriate, shall be monitored on a full-time basis by a qualified paleontological monitor. Should no fossils be observed during the first 50 percent of such excavations, paleontological monitoring could be reduced, under the discretion of the qualified paleontologist, to weekly spot-checking. Monitoring shall be conducted by a qualified paleontological monitor, defined as an individual who has experience with collection and salvage of paleontological resources and meets the minimum standards of the SVP (2010) for a Paleontological Resources Monitor If it is determined that the fossil(s) is (are) scientifically significant, the Qualified Paleontologist shall complete the following conditions to mitigate impacts to significant fossil resources: ○ Fossil Salvage. If fossils are discovered, the implementing agency shall be notified immediately, and the qualified paleontologist (or paleontological monitor) shall recover them. Typically, fossils can be safely salvaged quickly by a single paleontologist and not disrupt construction activity. In some cases, larger fossils (such as complete skeletons or large mammal fossils) require more extensive excavation and longer salvage periods. In this case, the paleontologist should have the authority to temporarily direct, divert or halt construction activity to ensure that the fossil(s) can be removed in a safe and timely manner. ○ Preparation and Curation of Recovered Fossils. Once salvaged, fossils shall be identified to the lowest possible taxonomic level, prepared to a curation-ready condition, and curated in a scientific institution with a permanent paleontological collection along with all pertinent field notes, photos, data, and maps ○ Final Paleontological Mitigation and Monitoring Report. Upon completion of ground disturbing activity (and curation of fossils, if necessary) the Qualified Paleontologist shall prepare a final mitigation and monitoring report outlining the results of the Paleontological Mitigation and Monitoring Program. The report shall include discussion of the location, duration and methods of the monitoring, stratigraphic sections, any recovered fossils, and the scientific significance of those fossils, and where fossils were curated. The report shall be submitted to the sponsor agency. If the monitoring efforts recovered fossils, then a copy of the report shall also be submitted to the designated museum repository.				
Greenhouse Gas Emissions and Climate Change				
GHG –1 Construction GHG Reduction Measures.				
The implementing agency shall incorporate the most recent GHG reduction measures and/or technologies for reducing GHG emissions measures for off-road construction vehicles during construction. The measures shall be noted on all construction plans, and the project sponsor shall perform periodic site inspections. Current GHG-reducing measures include the following: • Off road diesel construction equipment meeting the most stringent CARB emissions standards for off-road heavy-duty diesel engines must be used (e.g., as of 2026, this would be Tier 4 emission standards). Where the use of the most stringent CARB emissions standards for off-road heavy-duty diesel engines is not feasible, the next lower tier shall be used; where the use of the next lower tier is not feasible, the next lowest tier shall be used. • Use of on-road heavy-duty trucks that meet CARB’s most stringent or cleaner certification standard for on-road heavy-duty diesel engines, and comply with the State On-Road Regulation; • All on and off-road diesel equipment shall not idle for more than 5 minutes. Signs shall be posted in the designated queuing areas and or job sites to remind drivers and operators of the five-minute idling limit; • Substitute gasoline-powered in place of diesel-powered equipment, where feasible; • Use of alternatively fueled construction equipment, such as compressed natural gas (CNG), liquefied natural gas (LNG), propane or biodiesel, in place of diesel powered equipment for 15 percent of the fleet, to the extent electric powered equipment is not feasible; • Use of materials sourced from local suppliers; • Recycling of at least 75 percent of construction waste materials; and • Implementing agencies shall incentivize that construction workers carpool, and/or use electric vehicles to commute to and from the project site.	Ensure construction plans specify construction equipment is subject to the CARB Regulation for In-use Off-road Diesel Vehicles and, if feasible, construction equipment meets Tier 4 standards; or at least Tier 2 standards; and perform periodic site inspections. Ensure periodic site inspections are conducted.	During project permitting and environmental review	Once during project plan review; periodically during construction.	Implementing agencies/ project sponsor.

Mitigation Measure	Action Required	Timing	Monitoring Requirements	Responsible Agency
GHG-2 Land Use Project Energy Consumption and Water Use Reduction Measures				
The cities and the County, when processing discretionary land use projects, shall implement the following measures as applicable and feasible to the project. The cities and the County may also incorporate these measures into their local planning regulations. Measures to reduce GHG emissions for land use projects include, but are not limited to: • Require new residential and commercial construction to install solar energy systems or be solar-ready • Require new residential and commercial development to install low flow water fixtures • Require new residential and commercial development to install water-efficient drought-tolerant landscaping, including the use of compost and mulch • Require new development to exceed the applicable Title 24 energy-efficiency requirements • Require new residential and commercial development to offer information on recycling, composting, and disposal of household hazardous waste and e-waste • Require new development to implement circulation design elements in parking lots for non-residential uses to reduce vehicle queuing and improve the pedestrian environment.	Use project-level analysis of energy consumption, solid waste generation, and water use and incorporate mitigation measures as needed to specifications described in measure. Place conditions of approval on the project requiring energy- and water-saving measures.	During project permitting and environmental review.	Once during project-level environmental review and discretionary approval decisions for land use projects. Once prior to issuance of an occupancy permit.	Implementing agencies/ project sponsor.
GHG-4(a) Transportation-Related GHG Reduction Measures				
The implementing agency shall incorporate the most recent GHG reduction measures and/or technologies for reducing VMT and associated transportation related GHG emissions. GHG-reducing mitigation measures include the following: • Installation of electric vehicle charging stations beyond those required by State and local codes • Utilization of electric vehicles and/or alternatively fueled vehicles in company fleet • Provision of dedicated parking for carpools, vanpool, and clean air vehicles • Provision of vanpool and/or shuttle service for employees • Implementation of reduced parking minimum requirements • Implementation of maximum parking limits • Provision of bicycle parking facilities beyond those required by State and local codes • Provision of a bicycle-share program • Expansion of bicycle routes/lanes along the project site frontage • Provision of new or improved transit amenities (e.g., covered turnouts, bicycle racks, covered benches, signage, lighting) if project site is located along an existing transit route • Expansion of existing transit routes • Provision of transit subsidies • Expansion of sidewalk infrastructure along the project site frontage • Provision of safe, pedestrian-friendly, and interconnected sidewalks and streetscapes • Provision of employee lockers and showers • Provision of on-site services that reduce the need for off-site travel (e.g., childcare facilities, automatic teller machines, postal machines, food services) • Provision of alternative work schedule options, such as telework or reduced schedule (e.g., 9/80 or 10/40 schedules), for employees • Implementation of transportation demand management programs to educate and incentivize residents and/or employees to use transit, smart commute, and alternative transportation options	Place conditions of approval on the requirement of implementation of GHG and/or VMT reduction measures described in this mitigation.	During project permitting and environmental review.	Once during project-level environmental review and discretionary approval decisions for land use projects.	Implementing agencies/ project sponsor.

Mitigation Measure	Action Required	Timing	Monitoring Requirements	Responsible Agency
GHG-4(b) Land Use Project Energy Consumption and Water Use Reduction Measures				
For land use projects under their jurisdiction, the cities and counties in the StanCOG region can and should implement measures to reduce energy consumption, water use, solid waste generation, and VMT, all of which contribute to GHG emissions. Project specific environmental documents may adjust these mitigation measures as necessary to respond to site specific conditions. • Require new commercial construction to install solar energy systems or be solar-ready • Require new residential and commercial development to install low flow water fixtures • Require new residential and commercial development to install water-efficient drought-tolerant landscaping, including the use of compost and mulch • Require new development to exceed the applicable Title 24 energy-efficiency requirements • Encourage new development to be fully electric	Place conditions of approval on the requirement of implementation of GHG and/or VMT reduction measures described in this mitigation.	During project permitting and environmental review.	Once during project-level environmental review and discretionary approval decisions for land use projects.	Implementing agencies/ project sponsor.
Hazards and Hazardous Materials				
HAZ-3 Site Remediation				
If an individual project included in the proposed 2026 RTP/SCS is located on or near a hazardous materials and/or waste site pursuant to Government Code Section 65962.5, the implementing agency shall prepare a Phase I ESA in accordance with the American Society for Testing and Materials’ E-1527-05 standard. For work requiring any demolition or renovation, the Phase I ESA shall make recommendations for any hazardous building materials survey work that shall be done. All recommendations included in a Phase I ESA prepared for a site shall be implemented. If a Phase I ESA indicates the presence or likely presence of contamination, the implementing agency shall require a Phase II ESA, and recommendations of the Phase II ESA shall be fully implemented. Examples of typical recommendations provided in Phase I/II ESAs include removal of contaminated soil in accordance with a soil management plan approved by the local environmental health department; covering stockpiles of contaminated soil to prevent fugitive dust emissions; capturing groundwater encountered during construction in a holding tank for additional testing and characterization and disposal based on its characterization; and development of a health and safety plan for construction workers.	Where applicable, prepare a Phase I ESA meeting the specifications of this mitigation measure. Place conditions of approval on project requiring incorporation of recommendations of the Phase I ESA, and if applicable, Phase II ESA.	During project permitting and environmental review.	Once prior to issuing grading or demolitions permits; as required in the Phase I and/or Phase II ESA.	Implementing agencies/ project sponsor.
Hydrology and Water Quality				
HYD -2(a) Construction Dust Suppression Water Supply				
Where feasible, implementing agencies shall use reclaimed and/or recycled water for dust suppression during construction activities. This includes use of such reclaimed water in water trucks utilized for project construction occurring outside developed areas and away from water infrastructure which would otherwise provide such reclaimed water. This measure shall be noted on construction plans and shall be spot checked by the local implementing agency.	Place conditions of approval of individual projects on the implementation of mitigation detailed in this measure.	During project permitting and environmental review; during construction.	Ongoing throughout construction.	Implementing agencies/ project sponsor.
HYD -2(b) Landscape Watering				
In jurisdictions that do not already have an appropriate local regulatory program related to landscape watering, implementing agencies shall design proposed 2026 RTP/SCS projects that include landscaping shall be designed with drought tolerant plants and drip irrigation. When feasible, native plant species shall be used. In addition, landscaping associated with proposed improvements shall be maintained using reclaimed water when feasible. If reclaimed water could feasibly be utilized for project landscape watering due to proximity of reclaimed water sources but is unavailable due to lack of connecting infrastructure, implementing agencies shall conduct an analysis of the upgrades needed to provide such infrastructure, which will include the potential for new connections to existing reclaimed water systems to provide reclaimed water to other nearby sources besides the proposed project in the analysis, and shall perform such steps as necessary to utilize available reclaimed water if feasible.	If applicable, place conditions of approval on the inclusion of landscaping features described in this mitigation.	During project permitting and environmental review.	Once.	Implementing agencies/ project sponsor.
Noise				
N -1 Construction Noise Reduction				
To reduce construction noise levels to achieve applicable standards, implementing agencies for transportation and land use projects shall implement the measures identified below where feasible and necessary. a. Compliance with local Construction Noise Regulations. Implementing agencies shall ensure that, where residences or other noise sensitive uses are located within 800 feet of construction sites without pile driving, appropriate measures shall be implemented to ensure consistency with local noise ordinance requirements relating to construction. Specific techniques may include, but are not limited to, restrictions on construction timing, use of sound blankets on construction equipment, and the use of temporary walls and noise barriers to block and deflect noise.	Ensure consistency with local noise ordinance requirements relating to construction for sensitive uses. Place conditions of approval on project to require construction noise reduction measures detailed in this mitigation.	During project permitting and environmental review; prior to construction; during construction activities.	Ongoing throughout construction.	Implementing agencies/ project sponsor.

Mitigation Measure	Action Required	Timing	Monitoring Requirements	Responsible Agency
b. Noise Complaint and Enforcement Manager. Designate an on-site construction complaint and enforcement manager for projects within 800 feet of sensitive receivers. Implementing agencies shall post phone numbers for the on-site enforcement manager at construction sites along with complaint procedures and who to notify in the event of a problem. c. Pile Driving. For any project within 3,200 feet of sensitive receptors that requires pilings, the implementing agency shall require caisson drilling or sonic pile driving as opposed to pile driving, where feasible. This shall be accomplished through the placement of conditions on the project during its individual environmental review. d. Construction Equipment Noise Control. Implementing agencies shall ensure that equipment and trucks used for project construction utilize the best available noise control techniques including mufflers, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds. e. Impact Equipment Noise Control. Implementing agencies shall ensure that impact equipment (e.g., jack hammers, pavement breakers, and rock drills) used for project construction be hydraulically or electrically powered wherever feasible to avoid noise associated with compressed air exhaust from pneumatically powered tools. Where use of pneumatically powered tools is unavoidable, use of an exhaust muffler on the compressed air exhaust can lower noise levels from the exhaust by up to about 10 dBA. When feasible, external jackets on the impact equipment can achieve a reduction of 5 dBA. Whenever feasible, use quieter procedures, such as drilling rather than impact equipment operation. f. Construction Activity Timing Restrictions. The following timing restrictions shall apply to proposed 2026 RTP/SCS activates creating noise levels at or above 65 dBA at a nearby dwelling unit, except where timing restrictions are already established in local codes or policies. Construction activities shall be limited to: - Monday through Friday: 7 a.m. to 6 p.m. - Saturday: 9 a.m. to 5 p.m. - Sundays and Holidays: Not permitted g. Placement of Stationary Noise Sources. Locate stationary noise sources as far from noise-sensitive receptors as possible. Stationary noise sources that must be located near existing receptors will be equipped with the best available mufflers.				
N -2 Noise Assessment and Control for Transportation Noise Sources				
Implementing agencies for 2026 RTP/SCS projects shall complete detailed noise assessments using applicable guidelines (e.g., Caltrans Traffic Noise Analysis Protocol) for roadway projects that may impact noise sensitive receptors. The implementing agency shall ensure that a noise survey is conducted that, at minimum: - Determines existing and projected noise levels - Determines the amount of attenuation needed to reduce potential noise impacts to applicable State and local standards - Identifies potential alternate alignments that allow greater distance from, or greater buffering of, noise-sensitive areas - If warranted, recommends methods for mitigating noise impacts, including: - Appropriate setbacks - Sound attenuating building design, including retrofit of existing structures with sound attenuating building materials - Use of sound barriers (earthen berms, sound walls, or some combination of the two) Where new or expanded transportation projects are found to expose receptors to noise exceeding normally acceptable levels, the individual project lead agency shall implement techniques as recommended in the project-specific noise assessments. The preferred methods for mitigating noise impacts shall include the use of appropriate setbacks and sound attenuating building design, including retrofit of existing structures with sound attenuating building materials where feasible. In instances where use of these techniques is not feasible, the use of sound barriers (earthen berms, sound walls, or some combination of the two) shall be considered. Long expanses of walls or fences may be interrupted with offsets and provided with accents to prevent monotony. Landscape pockets and pedestrian access through walls may be provided. Whenever possible, a combination of elements shall be used, including open grade paving, solid fences, walls, and landscaped berms. Other techniques such as rubberized asphalt or “quiet pavement” shall be used where feasible to reduce road noise for new roadway segments or modifications requiring repaving. The effectiveness of noise reduction measures shall be monitored by taking noise measurements and installing adaptive mitigation measures to achieve applicable standards.	Prior to issuance of grading or building permits, ensure noise assessments have been completed. Place conditions of approval to require implementation of recommendations in project-specific noise assessments.	During project permitting and environmental review.	Once	Implementing agencies/ project sponsor.

Mitigation Measure	Action Required	Timing	Monitoring Requirements	Responsible Agency
N-3 (a) Vibration Mitigation for Construction of Transportation Projects				
If construction equipment would generate vibration levels exceeding acceptable levels as established by FTA (as shown in Table 4.12 2 and Table 4.12 3), implementing agencies of the proposed 2026 RTP/SCS shall, or can and should, complete the following tasks: • Prior to construction, survey the project site for vulnerable buildings, and complete geotechnical testing (preconstruction assessment of the existing subsurface conditions and structural integrity), for any older or historic buildings within 50 feet of pile driving. The testing shall be completed by a qualified geotechnical engineer and qualified historic preservation professional and/or structural engineer • Prepare and submit a report to the lead agency that contains the results of the geological testing. If recommended by the preconstruction report implementing agencies shall require ground vibration monitoring of nearby historic structures. Methods and technologies shall be based on the specific conditions at the construction site. The preconstruction assessment shall include a monitoring program to detect ground settlement or lateral movement of structures in the vicinity of pile-driving activities and identify corrective measures to be taken should monitored vibration levels indicate the potential for building damage. In the event of unacceptable ground movement with the potential to cause structural damage, all impact work shall cease, and corrective measures shall be implemented to minimize the risk to the subject, or adjacent, historic structure. • To minimize disturbance within 550 feet of pile-driving activities, implement “quiet” pile-driving technology, such as predrilling of piles and the use of more than one pile driver to shorten the duration of pile driving), where feasible, in consideration of geotechnical and structural requirements and conditions as defined as part of the geotechnical testing, if testing was feasible. • Use cushion blocks to dampen noise from pile driving. • Phase operations of construction equipment to avoid simultaneous vibration sources.	If applicable, place conditions of approval on project to require construction noise reduction measures detailed in this mitigation.	During project permitting and environmental review.	Once.	Implementing agencies/ project sponsor.
N-3(b) Vibration Mitigation for Operation of Transportation Projects				
Where local vibration and groundborne noise standards do not apply, implementing agencies of 2026 RTP/SCS projects shall comply with all applicable local vibration and groundborne noise standards, or in the absence of such local standards, comply with guidance provided by the FTA in Transit Noise and Vibration Impact Assessment (FTA 2018) to assess impacts to buildings and sensitive receptors and reduce vibration and groundborne noise. FTA recommended thresholds shall be used except in areas where local standards for groundborne noise and vibration have been established. Methods that can be implemented to reduce vibration and groundborne noise impacts include, but are not limited to: • Rail Traffic ◦ Maximizing the distance between tracks and sensitive uses ◦ Conducting rail grinding on a regular basis to keep tracks smooth ◦ Conducting wheel truing to re-contour wheels to provide a smooth-running surface and removing wheel flats ◦ Providing special track support systems such as floating slabs, resiliently supported ties, high-resilience fasteners and ballast mats; ◦ Implementing operational changes such as limiting train speed and reducing nighttime operations. • Bus and Truck ◦ Traffic Construction of noise barriers ◦ Use noise reducing tires and wheel construction on bus wheels ◦ Use vehicle skirts (i.e., a partial enclosure around each wheel with absorptive treatment) on freight vehicle wheels	Prior to issuance of grading or building permits, ensure noise assessments have been completed. Place conditions of approval to require implementation of recommendations in project-specific noise assessments.	During project permitting and environmental review	Once.	Implementing agencies/ project sponsor.

Mitigation Measure	Action Required	Timing	Monitoring Requirements	Responsible Agency
N-4 Noise Mitigation for Land Uses				
If a 2026 RTP/SCS land use project is located in an area with exterior ambient noise levels above local noise standards, the implementing agency shall ensure that a noise study is conducted to determine the existing exterior noise levels in the vicinity of the project. If the project would be impacted by ambient noise levels, feasible attenuation measures shall be used to reduce operational noise to meet acceptable standards. In addition, noise insulation techniques shall be utilized to reduce indoor noise levels to thresholds set in applicable State and/or local standards. Such measures may include but are not limited to: dual-paned windows, solid core exterior doors with perimeter weather stripping, air conditioning system so that windows and doors may remain closed and situating exterior doors away from roads. The noise study and determination of appropriate mitigation measures shall be completed during the project's individual environmental review.	Comply with all applicable local and/or FTA vibration and groundborne noise standards.	During project permitting and environmental review.	Open during project operation.	Implementing agencies/ project sponsor.
N-5 Noise Mitigation Near Airports				
Local lead agencies for all new development proposed to be located within an existing airport influence zone, as defined by the locally adopted ALUCP or local general plan, or within two miles of a private use airport, shall require a site specific noise compatibility study. The study shall consider and evaluate existing aircraft noise, based on specific aircraft activity data for the airport in question, and shall include recommendations for site design and building construction. Such measures may include but are not limited to: dual-paned windows, solid core exterior doors with perimeter weather stripping, air conditioning system so that windows and doors may remain closed, and situating exterior doors away from roads. The noise study and determination of appropriate mitigation measures shall be completed during the project's individual environmental review.	If applicable, require a site-specific noise compatibility study. Place conditions of approval on adherence to recommendations to site design and building construction, as recommended in the study.	During project permitting and environmental review.	Once	Implementing agencies/ project sponsor.
Transportation				
TRA-2(a) Land Use Project VMT Analysis and Reduction				
Regionally, implementing agencies shall require implementation of VMT reduction strategies through Transportation Demand Management programs, impact fee programs, mitigation banks or exchange programs, in-lieu fee programs, and other land use project conditions that reduce VMT. Programs shall be designed to reduce VMT from existing land uses, where feasible, and from new discretionary residential or employment land use projects. The design of programs and project specific mitigation shall focus on VMT reduction strategies that increase travel choices and improve the comfort and convenience of sharing rides in private vehicles, using public transit, biking, or walking. At a project level, implementing agencies shall evaluate VMT as part of project specific CEQA review and discretionary approval decisions for land use projects. Where project level significant impacts are identified, implementing agencies shall identify and implement measures that reduce VMT. Examples may include but are not limited to: • Provide car-sharing, vanpool, bike sharing, and ride-sharing programs • Implement or provide access to commute reduction programs • Encourage telecommute programs • Purchase AB 130 VMT mitigation credits • Incorporate affordable housing into the project • Increase density, infill, and transit oriented development • Increase mixed uses within the project area • Incorporate improved pedestrian connections within the project/neighborhood • Incentivize development in low VMT communities • Incentivize housing near commercial and offices • Increase access to goods and services, such as groceries, schools, and daycare • Orient the project toward transit, bicycle, and pedestrian facilities • Implement complete streets • Provide traffic calming • Provide bicycle parking • Reduce parking requirements • Separate out parking costs from building costs • Provide parking cash-out programs	Require the inclusion VMT reduction strategies included in this mitigation measure at a program and project-level.	During project permitting and environmental review.	Once.	Implementing agencies/ project sponsor.

Mitigation Measure	Action Required	Timing	Monitoring Requirements	Responsible Agency
TRA-2(b) Transportation Project VMT Analysis and Reduction				
Implementing agencies shall evaluate transportation projects that involve increasing roadway capacity for their potential to increase VMT. Where project-level increases are found to be significant, implementing agencies shall, or can and should, identify and implement measures that reduce VMT. Examples of measures that reduce VMT include: • Tolling new lanes to encourage carpools and fund transit improvements • Converting existing general purpose lanes to high occupancy vehicle lanes • VMT banks • Implementing or funding offsite travel demand management • Providing a bus rapid transit system • Implement bus on shoulder operations during peak congestion periods • Improving pedestrian or bicycle networks, or transit service • Providing transit passes • Incorporating neighborhood electric vehicle network	Evaluate the potential for projects to increase VMT. Where project-level significant impacts are identified, develop, and implement mitigation measures to reduce VMT.	During project permitting and environmental review	Once	Implementing agencies/ project sponsor.
Tribal Cultural Resources				
TCR-1 Identified Tribal Cultural Resources Impact Minimization				
Implementing agencies shall, or can and should, Transportation project sponsor agencies shall comply with AB 52, which may require formal tribal consultation. If the implementing agency determines that a project may cause a substantial adverse change to a tribal cultural resource, they shall implement mitigation measures identified in the consultation process required under PRC Section 21080.3.2, or shall implement the following measures where feasible to avoid or minimize the project-specific significant adverse impacts: • Avoidance and preservation of the resources in place, including, but not limited to: designing and building the project to avoid the resources and protect the cultural and natural context, or planning greenspace, parks, or other open space to incorporate the resources with culturally appropriate protection and management criteria. • 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: ◦ Protecting the cultural character and integrity of the resource ◦ Protecting the traditional use of the resource ◦ Protecting the confidentiality of the resource ◦ 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 • Native American monitoring by the appropriate tribe during soil disturbance for all projects in areas identified as sensitive for potential tribal cultural resources and/or in the vicinity (within 100 feet) of known tribal cultural resources. • If potential tribal cultural resources are encountered during ground-disturbing activities; work in the immediate area must halt and the appropriate tribal representative(s), the implementing agency, and an archaeologist meeting the Secretary of the Interior’s Professional Qualifications Standards for archaeology (National Park Service 1983) shall be contacted immediately to evaluate the find and determine the proper course of action and CUL-2(b)	Ensure compliance with AB 52; and when applicable, implement measures identified in this mitigation measure.	During project permitting and environmental review. Additional measures listed should be implemented prior to and during construction.	Ongoing throughout project construction.	Implementing agencies/ project sponsor.
Wildfire				
W-1 Wildfire Risk Reduction				
If an individual transportation or land use project included in the proposed 2026 RTP/SCS is within or less than two miles from a High or Very High FHSZ in the SRA as established by California Public Resources Code (PRC) Sections 4201 through 4204, or a High or Very High FHSZ in the LRA designated pursuant to California Government Code, Sections 51175 through 51189, the implementing agency shall require appropriate mitigation to reduce the risk. Examples of mitigation to reduce risk of loss, injury or death from wildlife include, but are not limited to: • Require the use of fire-resistant vegetation native to Stanislaus County and/or the local microclimate of the project site and discourage the use of fire-prone species, especially nonnative, invasive species. • Enforce defensible space regulations compliant with PRC Section 4291 or stricter as designated by the local governing body to keep overgrown and unmanaged vegetation, accumulations of trash and other flammable material away from structures.	If a project is within two miles of an SRA or VHFHSZ, implement mitigation described in this measure, such as maintaining and enforcing defensible space.	During project permitting and environmental review	Once.	Implementing agencies/ project sponsor.

Mitigation Measure	Action Required	Timing	Monitoring Requirements	Responsible Agency
• Provide public education about wildfire risk, fire prevention measures, and safety procedures and practices to allow for safe evacuation and/or options to shelter-in place during a wildfire emergency. • Require adherence to the local hazard mitigation plan, as well as the local general plan policies and programs aimed at reducing the risk of wildfires through land use compatibility, training, sustainable development, brush management, public outreach, and service standards for fire departments. • Ensure sufficient emergency water supply and operations for wildland fire suppression. • Encourage the development of landscaping maintenance schedules to include removal/ treatment of annual invasive species which may contribute to increased fuel loading. • Require a fire safety plan be submitted to and approved by the local fire protection agency. The fire safety plan shall include all of the fire safety features incorporated into the project and the schedule for implementation of the features. The local fire protection agency may require changes to the plan or may reject the plan if it does not adequately address fire hazards associated with the project as a whole or the individual phase of the project. • Prohibit certain project construction activities with potential to ignite wildfires during red-flag warnings issued by the National Weather Service for the project site location. Example activities that shall be prohibited during red-flag warnings include welding and grinding outside of enclosed buildings. • Require fire extinguishers to be onsite during construction of projects. Fire extinguishers shall be maintained to function according to manufacturer specifications. Construction personnel shall receive training on the proper methods of using a fire extinguisher. • Prohibit smoking and open fires at individual transportation or land use project sites implementing the proposed 2026 RTP/SCS during construction and operations. Provide the lead agency with a copy of the notification to all contractors regarding prohibited smoking. • Encourage the use of external sprinklers for new development mapped within Very High FHSZs. • Complete corridor-specific evaluations and implement traffic management measures, including coordination with local emergency response agencies. • Incorporate post-fire debris-flow, erosion, or landslide risk assessments during the design phase for hillside facilities or projects located in areas subject to post-fire geologic hazards.				

This page intentionally left blank.