



2026 Regional Transportation Plan & Sustainable Communities Strategy

Final Programmatic Environmental Impact Report

State Clearinghouse Number: 2025041249

prepared by

San Joaquin Council of Governments

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prepared with the assistance of

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September 2026

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1 Introduction

1.1 Final EIR Contents

This Final Environmental Impact Report (Final EIR) is an informational document prepared by the San Joaquin Council of Governments (SJCOG) to evaluate the potential environmental impacts of the proposed 2026 Regional Transportation Plan Sustainable Communities Strategy (2026 RTP/SCS) ("Plan" or "project").

As prescribed by the California Environmental Quality Act (CEQA) *Guidelines* Sections 15088 and 15132, the lead agency, SJCOG, is required to evaluate comments on environmental issues received from persons/agencies who have reviewed the Draft EIR and to prepare written responses to those comments. This document, together with the Draft EIR, as revised, 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 also includes amendments 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 includes the following contents:

- 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 Reporting Program

1.2 Draft EIR Public Review Process

SJCOG 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 June 22, 2026, and ended on August 6, 2026. The Draft EIR was made available on the SJCOG website (<https://www.sjcog.org/711/2026-Draft-Program-EIR>). As a result of these notification efforts, written and verbal comments on the content of the Draft EIR were received from five State and local agencies, one organization and one individual. 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 (DEIR) prepared for the 2026 Regional Transportation Plan/Sustainable Communities Strategy (2026 RTP/SCS).

The Draft EIR was circulated for a 45-day public review period that began on June 22, 2026, and ended on August 6, 2026. The San Joaquin Council of Governments (SJCOG) received eight 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	Betty Wilson, Executive Director, Business Council of San Joaquin County	2-8
3	Betty Wilson, Executive Director, Business Council of San Joaquin County	2-14
4	Jeff Henderson, Deputy Executive Officer, Delta Stewardship Council	2-20
5	Mary Elizabeth, Resident, Delta Conservation Team (Public Hearing Testimony)	2-30
6	Caleb Brock, Deputy District Director, California Department of Transportation (Caltrans)	2-33
7	David J. Rehnstrom, Manager of Water Distribution Planning, East Bay Municipal Utility District (EBMUD)	2-40
8	Mark Montelongo Director of Policy and Government Affairs, San Joaquin Valley Air Pollution Control District (SJVAPCD)	2-57

The comment letters and responses follow. The comment letters 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 Programmatic Environmental Impact Report (Draft PEIR) 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 6, 2026

Edith Verdin
 Senior Regional Planner
 San Joaquin Council of Governments
 555 E. Weber Ave.
 Stockton, CA 95202
rtp@sjcog.org

Subject: Comments for the Draft Programmatic Environmental Impact Report, 2026 Regional Transportation Plan/Sustainable Communities Strategy, SCH# 2025041249, San Joaquin County

Dear Edith Verdin,

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

The 2026 RTP/SCS will guide the development of transportation improvement programs, other transportation programming documents, and plans throughout San Joaquin County. Regulated streams and designated floodways within the Board's permitting authority are listed in **Table 1** below. 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](#).

Table 1: Regulated Streams and Floodways

Waterbody Name	Board Regulated Stream	USACE 408 Federally Regulated Stream	Designated Floodway
Atherton Cove	Yes	No	No
Banta Carbona Intake Canal	Yes	No	Yes
Bear Creek	Yes	Yes	Yes
Calaveras River	Yes	Yes	Yes
Duck Creek (upstream of confluence with Calaveras River)	Yes	No	No
Duck Creek (upstream of Walker Slough)	Yes	Yes	No
Duck Creek South Branch	Yes	Yes	No
Five Mile Slough	Yes	No	No
Fourteen Mile Slough	Yes	No	No
French Camp Slough	Yes	Yes	Yes

1.1

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Waterbody Name	Board Regulated Stream	USACE 408 Federally Regulated Stream	Designated Floodway
Littlejohns Creek	Yes	Yes	No
Lone Tree Creek, Middle Fork	Yes	No	No
Lone Tree Creek (upstream of French Camp Slough)	Yes	Yes	No
Mokelumne River	Yes	No	Yes
Mormon Slough	Yes	Yes	Yes
Mosher Creek	Yes	No	No
Mosher Slough	Yes	No	No
Old River	Yes	Yes	Yes
Paddy Creek (includes Middle and South)	Yes	Yes	Yes
Paradise Cut	Yes	Yes	Yes
Pixley Slough	Yes	Yes	No
Rock Creek	Yes	Yes	No
San Joaquin River	Yes	Yes	Yes
Smith Canal	Yes	No	No
Stanislaus River	Yes	Yes	Yes
Stockton Diversion Canal	Yes	Yes	Yes
Tom Paine Slough	Yes	No	No
Walker Slough	Yes	Yes	No
Walthall Slough	Yes	No	No

1.1
(cont.)

Please include the Central Valley Flood Protection Board permit regulatory setting under heading 1.6 Lead, Responsible, and Trustee Agencies; 4.11.2.b Regulatory Setting - State Laws, Regulations, and Policies; and 4.11.2.e Impact HYD-4.

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 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

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.

1.4

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

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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
(cont.)

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 work 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,
- 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

1.6

The Board, as a Responsible Agency under the California Environmental Quality Act (CEQA), will review and consider the environmental effects of the proposed work 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 work 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.

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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@cvfood.ca.gov if you have any questions.

1.6
(cont.)

Sincerely,

Jamie Silva

Jamie Silva

Environmental Program Manager

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

Steve Lamb
Steve.Lamb@cvflood.ca.gov

Letter 1

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

Date: July 6, 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 CVFPB be included as a responsible agency under Section 1.6 *Lead, Responsible, and Trustee Agencies* of the Draft PEIR. In order to more accurately reflect the regulatory setting of the 2026 RTP/SCS, the following revision will be implemented on Page 10 of Section 1.6, *Introduction*:

"While no responsible or trustee agencies are responsible for approvals associated with the adoption of the 2026 RTP/SCS, implementation of projects identified in the 2026 RTP/SCS will require permits and approvals from lead, responsible, and trustee agencies, which may include the following:

- Central Valley Flood Protection Board"

The commenter also requests similar revisions recognizing the CVFPB as a responsible agency in Section 4.11, *Hydrology and Water Quality* under subsections 4.11.2.b Regulatory Setting – State Laws, Regulations, and Policies. However, discussion of specific agencies is not included in this section and is more intended to provide information on applicable laws, regulations and policies rather than specific discussion on all responsible agencies with permitting authority. Therefore, no changes have been included in subsection 4.11.2.b. No further response is necessary.

The commenter similarly requests that the CVFPB be included as a responsible agency in subsection 4.11.2.e under Impact HYD-4. 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. 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.

From: Betty Wilson <bwilson@bci-sjc.org>
Sent: Monday, July 6, 2026 1:30 PM
To: RTP <RTP@sjcog.org>
Subject: Public Comment 2026 Regional Transportation Plan EIR
Importance: High

Enclosed are our public comments:

- | | |
|--|-----|
| 1. SJCOG to publish a capped, predictable VMT-mitigation fee or credit bank, instead of leaving costs to per-project negotiation. | 2.1 |
| 2. Quantify the freight and goods-movement benefits, and to avoid open-ended health-risk thresholds that make warehouse siting unpredictable. | 2.2 |
| 3. Flag internal inconsistencies that invite legal challenge: the population figure differs between chapters (about 878,093 in §3 versus about 950,019 used in the §4.14 VMT math), and the VMT-impact heading mis-states the result as “increasing” when the data show a roughly 5% decrease that is merely insufficient. | 2.3 |
| 4. SJCOG to remove template carryover from another county — the Executive Summary’s Impact AQ-3(a) names “TCAG” (the Tulare County Association of Governments) — not SJCOG — as a responsible agency, and several chapters (the Project Description, Transportation, Hydrology, and Cultural Resources) refer to an “MTP/SCS” and a 2050 horizon rather than SJCOG’s 2026 RTP/SCS. These errors undercut the document’s defensibility. | 2.4 |
| 5. SJCOG to reconcile the cumulative-wildfire finding (listed significant and unavoidable in §5.3 but mitigated to less-than-significant in §4.16). | 2.5 |
| 6. Please fund realism: since the superior alternative was rejected for lack of committed funding, ask how the preferred plan’s grant assumptions are more secure, and what happens to promised relief if grants fall short. | 2.6 |
| 7. Provide clarity on how farmland-mitigation credits will be administered, so the requirement is not a permitting bottleneck. | 2.7 |

Most of these are constructive, good-government asks — they make the EIR more accurate and more legally durable, which serves business by protecting the streamlining and certainty that depend on a defensible document. The funding and VMT-fee items are where the Council's economic interest is most direct.

Respectfully,
Betty Wilson
Executive Director
Business Council of San Joaquin County
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Letter 2

Commenter: Betty Wilson, Executive Director, Business Council of San Joaquin County

Date: July 8, 2026

Response 2.1

The commenter requests for the lead agency to establish a capped vehicle miles travelled (VMT)-mitigation fee or credit bank rather than assigning costs to “per-project negotiation”. The subject of this comment is outside the scope of this EIR as developing a VMT program as suggested would be a SJCOG policy decision to create a program and funds to create. This comment does not raise any issues regarding the adequacy of the environmental analysis in the EIR. No revisions are necessary.

Response 2.2

The commenter requests for the “freight and goods-movement benefits” to be quantified. CEQA does not require a lead agency to identify, quantify or list specific benefits of a project. CEQA Guidelines §15124(b) provides that a project's objectives should include the underlying purpose of the project and may discuss project benefits, making such discussion discretionary rather than mandatory.

Second, the commenter states that the health-risk thresholds identified in the EIR are open-ended and cause warehouse siting to be unpredictable. The health-risk thresholds utilized in the EIR are drawn from the San Joaquin Valley Air Pollution Control District (SJVAPCD) that are then adopted by the lead agency. CEQA Guidelines §15064.7 expressly authorizes lead agencies to develop and apply thresholds of significance for determining the significance of environmental impacts. The thresholds used in this analysis are therefore an accepted and recognized CEQA methodology, provided they are supported by substantial evidence, which was established in Section 4.2, *Air Quality* of the EIR. The comment is noted and does not raise any specific significant environmental issues or raise issues on the adequacy of the environmental analysis included in the EIR.

Response 2.3

The commenter states that population figures differ between Section 3, *Environmental Setting* and Section 4.14, *Transportation* in the EIR. Section 3 provides a population figure of 878,093 by 2049 and Section 4.14 provides a population figure of 950,019 by 2049. In order to reflect the most recent calculations presented in Appendix F, SJCOG 2026 RTP Induced VMT Assessment, which was prepared in May 2026, the following revisions will be incorporated into Section 3, *Environmental Setting* on Page 3-1:

“San Joaquin County is considered one of the fastest growing regions in the Central Valley, with the population expected to reach about ~~878,093~~ 950,019 people by 2049 (Damkowitz & Molakatalla 2026).”

This revision to the population number does not affect the analysis or conclusions in the EIR. The commenter also notes that the VMT-impact heading misstates the result as “increasing” when the underlying data indicate an approximately 5 percent decrease in VMT. The heading in the DEIR on Section 4.14, *Transportation*, Page 4.14-22, “Overall Increase in Regional VMT” is an accurate heading. Total VMT for the SJCOG region is anticipated to increase from 18,773,254 in 2023 to 22,069,148 with the plan in 2049. This demonstrates an increase of 3,295,894 VMT by 2049. It is also noted that included VMT amounts were adjusted after release of the DEIR. This change resulted in changes to per capita GHG amount as shown in Table 4.14-3 and 4.9-4 below.

Table 4.14-3 VMT Results Summary

Scenario	2023	2049 Plan	2049 No Build
Base VMT (SJCOG Model)	18,773,254	<u>21,195,438</u> <u>21,418,525</u>	<u>21,195,438</u> <u>21,304,545</u>
Short-Term Induced VMT (SJCOG Model)	N/A	<u>241,612</u> <u>223,087</u>	<u>103,124</u> <u>109,107</u>
Long-Term Induced VMT (NCST)	N/A	<u>632,098</u> <u>288,867</u>	<u>105,743</u> <u>45,267</u>
Total Induced VMT (Hybrid)	N/A	<u>873,710</u> <u>511,954</u>	<u>208,867</u> <u>154,374</u>
Total VMT	18,773,254	<u>22,069,148</u> <u>21,930,479</u>	<u>21,404,305</u> <u>21,458,919</u>

Source: SJCOG Modelling Information

¹ Reflects all capacity increasing projects both planned and programmed

² Reflects programmed capacity increasing projects only.

Table 4.9-4 Per Capita Passenger Vehicle CO₂ Emissions Comparison

	Percent Change in Per Capita CO ₂ Emissions (lbs/day)		
	2005 Baseline (per SB 375)	2035	2049
Per Capita Passenger Vehicle Emissions ¹	<u>20.4</u> <u>18.5</u>	<u>16.7</u> <u>15.0</u>	<u>14.8</u> <u>14.2</u>
Percent Change from in Per Capita GHG Emissions from 2005		-18.119.2%	-27.523.2%
SB 375 Target		-16%	n/a ²
SB 375 Target Met?		Yes	n/a ²

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

Source: Appendix E

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

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

No further revisions to the EIR are necessary.

Response 2.4

The commenter notes inconsistencies within Table ES-1 in *Executive Summary* of the EIR. These include referring to the Tulare County Association of Governments (TCAG), MTP/SCS, and a 2050 planning horizon. The following revisions will be implemented into the EIR:

Page ES-8 of *Executive Summary*:

"AQ-3(a) PM10 Emissions Reduction. To help reduce regional PM10 emissions, ~~TCAG~~ SJCOG, in partnership with SJVAPCD and implementing agencies, shall..."

Page ES-24 of *Executive Summary*:

"Impact WF-2: Proposed transportation improvements and land use projects envisioned by the 2026 ~~MTP~~ RTP/SCS would be located in or near SRAs."

Page 4.11-18 of Section 4.11, *Hydrology and Water Quality*:

"The SWRCB and RWQCBs implement and enforce the Industrial General Permit, which may impact any industrial development under the ~~2050 MTP~~ 2026 RTP/SCS land use scenario."

Page 4.4-17 of Section 4.4, *Cultural Resources*:

"The following section describes cultural resource impacts associated with the transportation improvements and future land use scenario in the ~~2050 MTP~~ 2026 RTP/SCS."

These typographical errors do not affect the analysis or conclusions in the EIR and no further revisions to the EIR are necessary.

The commenter states that there were similar errors in both Section 2, *Project Description* and Section 4.14, *Transportation*, but there were no errors present as described in those sections, therefore no revisions to those sections are required.

Response 2.5

The commenter notes that there are inconsistent impact determinations between Section 4.16, *Wildfire* and Section 5.3, *Other CEQA*. The commenter states that the cumulative impact finding is described as less than cumulatively considerable level in Section 4.16 but included in the Section 5.3 *List of Significant and Unavoidable Impacts*. This impact was added to this list erroneously and has been corrected by deleting from Section 5, *Other CEQA* on Page 5-6:

5.3 List of Significant and Unavoidable Impacts

As discussed in Sections 4.1 through 4.16 of the DEIR, implementation of the proposed 2026 RTP/SCS would result in the following significant and unavoidable impacts.

...

- Cumulative – Transportation (increase in VMT)
- ~~Cumulative – Wildfire (construction and operation of proposed 2026 RTP/SCS projects)~~

These typographical errors do not affect the analysis or conclusions in the EIR and no further revisions to the EIR are necessary.

Response 2.6

The commenter requests that the EIR explain how the proposed project's grant funding is more secure than the funding assumed for the superior alternative, which was found infeasible in part due to funding constraints. Impacts related to cultural resources and noise, were identified as similar to the proposed project, and land use impacts identified as greater due to increased potential inconsistencies with local plans. The commenter also requests disclosure regarding the extent to which anticipated project benefits would be affected if grant funding is not obtained. Funding for the RTP is based on projected available transportation funds through 2049 as described in the 2026 RTP/SCS. As discussed in Section 6 *Alternatives*, Page 6-25 through 6-26, the proposed 2026 RTP/SCS is based on a financial program of projected revenues through 2049, whereas Alternative 2 (Accelerate Infill) would require a substantially more transit-intensive investment program and enhanced transit-supportive infrastructure beyond the funding currently identified in the RTP. Implementation of Alternative 2 would require either the diversion of funds from other programmed transportation investments or the identification of new revenue sources not currently programmed; therefore, Alternative 2 was determined to be economically infeasible. In addition, the environmental and transportation benefits anticipated under Alternative 2 are dependent on implementation of these additional transit investments and associated land use changes; if those investments are not funded, the projected benefits may not be fully realized. CEQA requires an EIR to evaluate a reasonable range of alternatives and identify the environmentally superior alternative, as well as disclose the factors considered in determining whether an alternative is feasible. CEQA does not

require an agency to demonstrate that all project funding sources are committed at the time of environmental review, nor does it require proof that future grant funding is guaranteed. Rather, CEQA requires disclosure of the basis for feasibility conclusions and the environmental consequences of the proposed project and alternatives. Therefore, Section 6, *Alternatives* contains adequate information regarding project feasibility and environmental effects, consistent with CEQA's informational requirements. No further revision to the EIR is required to address this comment.

Response 2.7

The commenter requests additional information regarding how farmland mitigation credits will be administered and expresses concern that implementation of the farmland mitigation program could become a permitting bottleneck that delays project approvals or implementation. This mitigation would be administered on a project by project basis as further analyzed in the project level CEQA for each individual RTP/SCS project. CEQA requires an EIR to describe mitigation measures with sufficient detail to demonstrate that significant environmental impacts can be reduced or minimized. CEQA does not require an EIR to include all permitting processes that may be developed following project approval. As described in the EIR, the project would be required to implement farmland mitigation consistent with Mitigation Measure AG-1 (Page 4.6-10). The EIR adequately discloses the purpose of the mitigation and describes how the farmland impacts would be addressed. The commenter has not identified substantial evidence demonstrating that the mitigation measure is infeasible or that administration of farmland mitigation credits would impede implementation of the project. Therefore, Mitigation Measure AG-1 is adequate for purposes of CEQA, and no further revision to the EIR is required.

Response 2.8

The commenter states that the recommended revisions would improve the accuracy and legal defensibility of the EIR and asserts that certain issues are of particular interest to the business community. This comment is acknowledged. As this is a programmatic EIR, the assessments and proposed mitigation of impacts are identified to address potential impacts from the individual projects listed in the RTP and land use developments that could occur under the SCS. These projects are required to go through their own CEQA project level review prior to being approved. It is at this time that specific project impacts and mitigation for those impacts would be identified. This would include specific farmland and VMT mitigation to address project specific impacts. No further revision to the EIR is required.

From: Betty Wilson <bwilson@bci-sjc.org>
Sent: Monday, July 6, 2026 1:32 PM
To: RTP <RTP@sjcog.org>
Subject: Public Comment EIR

Below are additional comments regarding the EIR. Thank you!

These are the impacts the EIR concludes cannot be fully mitigated. Each requires the decision-makers to adopt a “Statement of Overriding Considerations” to approve the plan. (Source: Executive Summary Table ES-1; §5.3.)

Air quality

Construction criteria pollutants (AQ-2); operational criteria pollutants (AQ-3); particulate matter at sensitive receptors (AQ-4); toxic air contaminants / diesel (AQ-5); plus cumulative air quality.

Climate

Construction greenhouse gas (GHG-1); operational greenhouse gas to 2049 (GHG-2); conflict with state long-term climate law SB 32 / AB 1279 (GHG-4); plus cumulative. Note: the binding SB 375 2035 target (GHG-3) is met — the one clear pass.

Transportation

Regional and per-capita Vehicle Miles Traveled (TRA-2); plus cumulative VMT.

Agriculture

Conversion of Important Farmland (AG-1); plus cumulative farmland conversion.

Water

Groundwater supply and recharge (HYD-2).

Noise

3.1

3.2

Construction noise (NOI-1); operational noise (NOI-2); groundborne vibration (NOI-3); sensitive receptors in high-noise areas (NOI-4).	3.2
Scenic / cultural Scenic vistas and corridors (AES-1/2/3); historical resources (CUL-1); archaeological resources (CUL-2); paleontological resources (GEO-5).	(cont.)
Biology Wildlife and fish movement (BIO-3).	
Cumulative-only Transport of hazards; wildfire (note: §4.16 reaches a less-than-significant conclusion — an inconsistency worth a comment).	3.3

What future projects will inherit (mitigation menu)

Because later projects “tier” off this EIR, these measures become the conditions local agencies attach to them. This is the practical cost-and-compliance checklist for any future discretionary project.	3.4
Transportation / VMT TDM programs, impact or in-lieu fees, VMT banks or exchanges, and AB 130 VMT credits (available from July 1, 2026). (§4.14)	3.5
Air — construction Tier 4 off-road diesel equipment, electric equipment where feasible, dust controls triggered at 150 vehicle trips per day. (§4.2, AQ-2)	3.6
Air — operations Above-code building energy, solar, cool roofs, EV charging, careful receptor siting. (§4.2, AQ-3)	3.7
Air — freight / toxics Health-risk analysis; 500-foot freeway and 1,000-foot railyard buffers; filtration; “do not locate sensitive receptors near a distribution center’s entry and exit.” (§4.2, AQ-5)	3.8
Climate 75% construction-waste recycling and alt-fuel fleets; solar-ready and above-Title-24 buildings; EV charging beyond code; electrification and TDM. (§4.9)	3.9
Farmland 1-to-1 agricultural conservation easements “equal in quality and size,” or purchased credits. (§4.6, AG-1)	3.10
Water Recycled water for dust control and landscaping (may require building the connection); stormwater permits and low-impact design for any disturbance over one acre. (§4.11)	3.11
Biology County habitat-plan (SJMSCP) fee or land dedication — or a full survey, agency-permit, mitigation-bank, and monitoring cascade. (§4.3)	3.12
Cultural / tribal Architectural-historian review of buildings over 45 years; archaeological records search; AB 52 tribal consultation; monitoring and stop-work protocols. (§4.4; §4.15)	3.13

Respectfully,
 Betty Wilson
 Executive Director
 Business Council of San Joaquin County
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Letter 3

Commenter: Betty Wilson, Executive Director, Business Council of San Joaquin County

Date: July 8, 2026

Response 3.1

The commenter identifies that there are impacts in the EIR that cannot be fully mitigated, which will require the preparation of a “Statement of Overriding Considerations”. A Statement of Overriding Considerations has been prepared that identifies all impacts identified as significant and unavoidable. The comment does not identify a specific inadequacy in the environmental analysis requiring revision and is noted. No further revision to the EIR is required.

Response 3.2

The commenter summarizes the issue areas with significant and unavoidable impacts disclosed in the EIR and does not identify a specific deficiency in the environmental analysis or request revisions to the document. The EIR fully discloses the identified impacts, mitigation measures, and significance determinations consistent with CEQA. No further revision to the EIR is required.

Response 3.3

The commenter notes an inconsistency between the cumulative impact of transporting hazardous materials and wildfire impact WF-1 identified in Section 4.16, *Wildfire*. These are two different impacts. WF-1 only applies to projects in or near a State Responsibility Area whereas the transporting of hazardous materials is a separate impact. Therefore, there is no discrepancy between the two impacts having different impact conclusions and no further revision to the EIR is required.

Response 3.4

The comment states that the 2026 RTP/SCS acts as a tiering document for later projects. This comment is acknowledged. The comment does not identify a specific issue regarding the adequacy of the environmental analysis requiring revision. No further response is required.

Response 3.5

The commenter notes the various measures that would address VMT impacts and are highly dependent upon an individual project’s environmental review, as each mitigation measure in the 2026 RTP/SCS does not automatically apply to every project in the same way. The commenter notes the applicability of AB 130 to eligible urban infill housing development projects that may utilize the 2026 RTP/SCS as a tiering document. AB 130 also establishes a VMT mitigation program to be administered through the California Department of Housing and Community Development (HCD), which allows lead agencies to satisfy CEQA VMT mitigation requirements by contributing funds based on a project’s VMT impacts, with those funds used to support affordable housing and other investments that promote VMT reductions. Mitigation Measure TRA-2(a) Regional VMT Reduction Programs aims to reduce VMT through various strategies, including purchasing AB 130 VMT mitigation credits. The commenter does not identify any specific issue regarding the adequacy of Mitigation Measure TRA-2(a) or the transportation analysis requiring revision. No further revision to the EIR is required.

Response 3.6

The commenter states that Tier 4 off-road diesel equipment, electric equipment where feasible, dust controls are triggered at 150 vehicle trips per day. This is not a set standard identified by SJVAPCD regulations to automatically trigger dust controls throughout the Valley. Mitigation measures AQ-2(a) and

AQ-2(b) address the application of feasible SJVAPCD mitigation measures and diesel equipment mitigation. No further revision to the EIR is required.

Response 3.7

The commenter lists various operational air quality mitigation measures including building energy measures such as solar energy, cool roofs, EV charging and careful receptor siting. This comment is noted. The comment does not identify a specific issue regarding the adequacy of the environmental analysis requiring revision. No further revision to the EIR is required.

Response 3.8

The commenter lists various air quality mitigation measures to mitigate toxic air contaminants including building code adherence, solar energy, cool roofs, EV charging and careful receptor siting. This comment is noted. The comment does not identify a specific issue regarding the adequacy of the environmental analysis requiring revision. No further revision to the EIR is required.

Response 3.9

The commenter lists various climate change related mitigation measures including 75% construction-waste recycling, alternative fuels, solar-ready buildings, and infrastructure electrification. This comment is noted. The comment does not identify a specific issue regarding the adequacy of the environmental analysis requiring revision. No further revision to the EIR is required.

Response 3.10

The commenter lists agricultural mitigation measures which are agricultural easements at a 1:1 ratio for farmland. Mitigation Measure AG-1 Impact Avoidance and Minimization, bullet four requires compensation at least equal in quality and size to the area agricultural lands being impacted (page 4.6-11). The comment does not identify a specific issue regarding the adequacy of the environmental analysis requiring revision. No further revision to the EIR is required.

Response 3.11

The commenter lists various hydrology and water quality mitigation measures including utilizing recycled water for dust control and landscaping, stormwater permits, and "low-impact design". This comment is noted. The comment does not identify a specific issue regarding the adequacy of the environmental analysis requiring revision. No further revision to the EIR is required.

Response 3.12

The commenter lists various biological resource mitigation measures including participation in the SJMSCP habitat conservation plan, project-specific studies and permitting. This comment is noted. The comment does not identify a specific issue regarding the adequacy of the environmental analysis requiring revision. No further revision to the EIR is required.

Response 3.13

The commenter lists the mitigation measures to mitigate cultural resource impacts which include records searches, AB 52 tribal consultation and construction monitoring. This comment is noted. The comment does not identify a specific issue regarding the adequacy of the environmental analysis requiring revision. No further revision to the EIR is required.



**Delta
Stewardship
Council**

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July 23, 2026

Edith Verdin
San Joaquin Council of Governments
555 E. Weber Ave.
Stockton, CA 95202

Delivered via email: rtp@sjcog.org

**Re: Comments on the San Joaquin Council of Governments Draft 2026
Regional Transportation Plan and Sustainable Communities Strategy
and Draft Programmatic Environmental Impact Report, SCH#
2025041249**

Dear Edith Verdin:

Thank you for the opportunity to review and comment on the Draft Programmatic Environmental Impact Report (Draft PEIR) for the San Joaquin Council of Governments (SJCOG) Draft 2026 Regional Transportation Plan (RTP) and Sustainable Communities Strategy (SCS; collectively 2026 RTP/SCS). The Delta Stewardship Council (Council) recognizes the objectives described in the 2026 RTP/SCS and Draft PEIR to achieve various federal, state, regional, and local policy objectives related to sustainable development, transportation, and greenhouse gas emissions reduction while considering financial, growth, and regulatory constraints.

4.1

This letter summarizes the requirements of the Sacramento-San Joaquin Delta Reform Act of 2009 (Wat. Code, § 85000 et seq., Delta Reform Act) pertaining to the 2026 RTP/SCS and provides the Council's comments on the 2026 RTP/SCS and Draft

PEIR. The Council is an independent state agency established by the Delta Reform Act, charged with furthering California's coequal goals of providing a more reliable water supply and protecting, restoring, and enhancing the Sacramento-San Joaquin River Delta (Delta) ecosystem. (Wat. Code, § 85054.) The Delta Reform Act further states that the coequal goals are to be achieved in a manner that protects and enhances the unique cultural, recreational, natural resource, and agricultural values of the Delta as an evolving place. (Wat. Code, § 85054.) The Council is charged with furthering California's coequal goals for the Delta through the adoption and implementation of the Delta Plan. (Wat. Code, § 85300.)

4.1 (cont.)

SJCOG's 2026 RTP/SCS is a regional transportation plan for the San Joaquin County region, which includes the incorporated cities of Escalon, Lodi, Manteca, Mountain House, Ripon, Stockton, and Tracy and all unincorporated areas under the jurisdiction of San Joaquin County.

Delta Reform Act Requirements for Sustainable Communities Strategies

The Delta Reform Act requires metropolitan planning organizations (MPOs) to consult with the Council when preparing an SCS that includes land within the primary or secondary zones of the Delta. (Wat. Code § 85212.) Council staff and SJCOG staff met for this purpose on May 13, 2025.

The Delta Reform Act also requires SJCOG to provide a draft SCS to the Council no later than 60 days prior to the adoption of the final RTP. (Wat. Code § 85212.) SJCOG submitted a draft 2026 RTP/SCS to the Council on June 12, 2026.

4.2

Council's Review and Input on the Draft Programmatic EIR and the 2026 RTP/SCS

This section summarizes Council staff's review of and input on the 2026 RTP/SCS. It also summarizes Council staff's comments on the Draft PEIR.

1. Consistency with Ecosystem Restoration Needs and Sufficiency of Lands Set Aside

Water Code section 85212 requires that the Council's input on local and regional planning documents, including a SCS, include, but not be limited to, both of the following:

- the consistency of those local and regional planning documents with the ecosystem restoration needs of the Delta
- whether the land set aside for natural resource protection is sufficient to meet the Delta ecosystem needs

4.2
(cont.)

a. Consistency with Restoration Needs

The Delta Plan designates six priority habitat restoration areas (PHRAs) that have the greatest potential for large-scale habitat restoration (Delta Plan, Chapter 4, p. 4-47 to 4-50). Delta Plan Policy **ER P3** (Cal. Code Regs., tit. 23, § 5007.) states that significant adverse impacts to the opportunity to restore habitat must be avoided or mitigated in these areas (depicted in Cal. Code, Regs., tit. 23, app. 5.) (<http://deltacouncil.ca.gov/sites/default/files/2015/09/Appendix%205.pdf>).

4.3

Two PHRAs are located partially or wholly within the SJCOG region 2026 RTP/SCS planning area: the Cosumnes-Mokelumne Confluence, located in the northwest area of San Joaquin County, and the Lower San Joaquin River Floodplain, located southwest of Stockton. In the Council's May 19, 2025, comment letter on the Notice of Preparation (NOP) for the Draft PEIR, staff requested that the Draft PEIR describe the planned land uses identified in these areas and discuss how significant adverse impacts to the opportunity to restore habitat in these locations would be avoided or mitigated.

The 2026 RTP/SCS seeks to improve jobs and services, reduce vehicle travel, and improve air quality by reducing transportation-related emissions. The Draft PEIR identifies that new development anticipated within the Delta in the 2026 RTP/SCS would occur as infill, mixed use, and transit-oriented development within existing urbanized areas and areas already designated for such development in adopted city and county general plans. (2026 RTP/SCS p. 3-14) The 2026 RTP/SCS neither identifies, nor specifically states, that future development would occur in these PHRAs. Draft PEIR Figure 4.3-2, Wetlands and Drainages in the SJCOG Region, does not identify Transportation Projects within these PHRAs. (Draft PEIR, p. 4.3-7, Draft 2026 RTP/SCS, Appendix F).

4.4

Finding: Based on the review of the 2026 RTP/SCS and Draft PEIR, and in compliance with Water Code section 85212, Council staff has not identified any inconsistency of the 2026 RTP/SCS with Delta Plan regulatory policy **ER P3**.

4.4
(cont.)

b. Sufficiency of Lands Set Aside

The 2026 RTP/SCS does not specifically address setting aside lands for natural resource protection. The 2026 RTP/SCS incentivizes natural resource protection by encouraging growth in existing designated population centers and by maximizing the efficiency of the existing transportation network. Council staff recognizes SJCOG is continuing the principles established in previous RTP/SCS cycles that encourage compact, mixed-use, and infill development; a variety of housing types and transportation modes; quality design; and natural resource conservation. The 2026 RTP/SCS is designed to maintain and foster the balance between jobs and housing and to optimize transportation investments that support those land uses.

Senate Bill 375 (Stats. 2008, ch. 728.) provides California Environmental Quality Act (Pub. Resources Code, § 21000, et seq.; CEQA) streamlining benefits for certain projects that are consistent with the RTP/SCS land use and transportation pattern. The 2026 RTP/SCS and Draft PEIR aim to facilitate these CEQA streamlining benefits for qualifying residential, mixed-use, and transit priority projects that are consistent with the general use designation, density, building intensity, and applicable policies specified in the 2026 RTP/SCS (Draft PEIR, p. 1-3). The 2026 RTP/SCS Appendix U maps and figures illustrate the location of the High Quality Transit Areas and the locations of new housing and employment growth (Appendix U Statutory Mapping, pp. U-3, U-4, U-7). Based on the mapped locations, the 2026 RTP/SCS would not provide CEQA streamlining benefits to projects outside of existing city boundaries or within any PHRA. Based on the locations of the High Quality Transit Areas, the 2026 RTP/SCS is not likely to incentivize development in areas within the Delta that are necessary to meet the Delta's ecosystem needs.

4.5

Finding: Based on the review of the 2026 RTP/SCS and the Draft PEIR, and in compliance with the Water Code section 85212, Council staff has not identified any inconsistency of the 2026 RTP/SCS with Delta Plan regulatory policy **ER P3**.

2. Consistency with the Delta Plan

The Delta Reform Act requires the Council to review and provide timely advice to planning agencies regarding the consistency of local and regional planning documents, including an SCS, with the Delta Plan. (Wat. Code, § 85212.)

a. Land Use Pattern

Delta Plan Policy **DP P1** (Cal. Code Regs., tit. 23, § 5010.) places certain limits on new urban development within the Delta. New residential, commercial, and industrial development must be limited to areas that city or county general plans designate for that development as of the date of the Delta Plan's adoption of May 16, 2013. This policy is intended to strengthen existing Delta communities while protecting designated agricultural land and open space, providing land for ecosystem restoration needs, and reducing flood risk.

A state or local agency that proposes to carry out, approve, or fund an action that occurs in whole or in part in the Delta is required to determine if that action is a covered action, and if so, to prepare a written Certification of Consistency with detailed findings as to whether the covered action is consistent with the Delta Plan and submit that certification to the Council prior to implementation of the project. (Wat. Code, § 85225.) The Delta Reform Act exempts from this requirement actions within the Secondary Zone of the Delta that an MPO determines are consistent with its SCS, provided that the State Air Resources Board has determined the SCS would achieve regional greenhouse gas emissions reduction targets. (Wat. Code § 85057.5, subd. (b)(4).) SJCOG is the MPO for the San Joaquin County region, which contains portions of the Secondary Zone of the Delta. Thus, Water Code section 85057.5, subdivision (b)(4), provides SJCOG with a role in shaping the State's Delta policy.

4.6

Council staff's NOP comment letter dated May 19, 2025, requested the Draft PEIR analyze whether the 2026 RTP/SCS would include new urban development within the Delta. The Draft PEIR does not directly acknowledge consistency with policy **DP P1**. However, SJCOG acknowledges the 2026 RTP/SCS is required to ensure consistency with the Delta Plan. Local project exemptions from the Delta Plan requirements are possible if SJCOG determines that they are consistent with the applicable RTP/SCS (2026 RTP/SCS, p.1-17). (Wat. Code, § 85057.5, subd. (b)(4).)

Regional growth anticipated within or adjacent to the Delta would limit residential, commercial, or industrial development to areas that city or county general plans designate for that type of development. The housing strategies would continue the SJCOG region's commitment to growth in infill areas. Because the 2026 RTP/SCS uses established growth forecasts, relies on local general plans and Housing Elements, and does not propose new development areas or infrastructure extensions that could induce unplanned growth in the Secondary Zone of the Delta, the proposed 2026 RTP/SCS would be consistent with projected and planned growth anticipated under **DP P1** (2026 RTP/SCS, p. 4.17-3).

4.6
(cont.)

Finding: Based on the review of the 2026 RTP/SCS and Draft PEIR, and in compliance with Water Code section 85212, Council staff has not identified any inconsistency of the 2026 RTP/SCS with Delta Plan regulatory policy **DP P1**.

a. Transportation Investments

The recommended transportation projects in the 2026 RTP/SCS include investments in both rural and urban areas located within the Delta. These transportation projects would advance Delta Plan recommendation **DP R11** to protect and improve existing recreation opportunities while seeking ways of providing new and better coordination opportunities across San Joaquin County. The 2026 RTP/SCS investments include projects within the Delta that support recreation, such as proposed new and improved bicycle and pedestrian routes that would provide new and improved connectivity to transit and local destinations throughout San Joaquin County (2026 RTP/SCS, Ch. 5).

4.7

The Delta Plan also recommends providing adequate infrastructure within the Delta. Recommendation **DP R5** states: "The California Department of Transportation, local agencies, and utilities should plan infrastructure, such as roads and highways, to meet needs of development consistent with sustainable community strategies, local plans, the Delta Protection Commission's Land Use and Resource Management Plan for the Primary Zone of the Delta, and the Delta Plan." Several planned transportation investments in the 2026 RTP/SCS address the effects of extreme weather impacts by supporting infrastructure that can withstand extreme heat, flooding, and other environmental stressors. The 2026 RTP/SCS promotes energy-efficient infrastructure and clean transportation technologies

while coordinating across jurisdictions to improve long-term system reliability that would improve the capacity and safety of roads and highways in the Delta. The 2026 RTP/SCS also includes multiple projects to restore pavement and redesign streetscapes to be more pedestrian and bike friendly. Roadway improvement projects in the Delta described in the 2026 RTP/SCS and Draft PEIR would improve agricultural and goods movement travel and improve accessibility for slow-moving farm equipment (2026 RTP/SCS, Ch. 3; Appendix F).

4.7
(cont.)

Finding: Based on the review of the 2026 RTP/SCS and Draft PEIR, and in compliance with Water Code section 85212, Council staff has not identified any inconsistency of the recommended transportation projects identified in the 2026 RTP/SCS with Delta Plan recommendations concerning transportation in the Delta.

Closing Comments

Pursuant to Water Code section 85212, Council staff has reviewed and provided advice and input on the 2026 RTP/SCS and Draft PEIR as outlined in this letter. Council staff has not identified any inconsistency with the Delta Plan. The two plans are complementary in nature, serving to protect the Delta while promoting sustainable growth and economic vitality in the broader region.

4.8

Council staff invites the San Joaquin Council of Governments to continue to engage Council staff following the adoption of the 2026 RTP/SCS to coordinate implementation and subsequent plan updates. Please contact Eva Bush at Eva.Bush@deltacouncil.ca.gov with any questions.

Sincerely,



Jeff Henderson

Deputy Executive Officer

Attachment 1: Council's NOP Comment Letter, May 19, 2025

Letter 4

Commenter: Jeff Henderson, Deputy Executive Officer, Delta Stewardship Council, California State Agency

Date: July 23, 2026

Response 4.1

The commenter acknowledges the objectives identified in the 2026 RTP/SCS and the purpose of the objectives regarding local policy objectives and the Delta Reform Act. The comment does not raise an issue regarding the adequacy of the environmental analysis. No further response is required.

Response 4.2

The commenter details the requirements of the Delta Reform Act in the context of the 2026 RTP/SCS. The commenter describes the project's consistency with the Ecosystem Restoration Needs and the sufficiency of land set asides with Water Code section 85212. This comment serves as an introduction to the review and does not raise an issue regarding the adequacy of the environmental analysis. No further response is required.

Response 4.3

The commenter introduces the Delta Plan's designation of six priority habitat restoration areas (PHRAs) and identifies that there are two PHRAs within the SJCOG planning area. The commenter notes that the comment letter prepared for the NOP requested that the Draft PEIR discuss how significant adverse impacts to the restoration of habitat in these PHRAs be avoided or mitigated. The RTP/SCS's planned land uses in the Cosumnes-Mokelumne Confluence, located in the northwest area of San Joaquin County, and the Lower San Joaquin River Floodplain, located southwest of Stockton are consistent with the land uses identified in the local General Plans for this region. The Draft PEIR incorporates a comprehensive avoidance, minimization, and compensatory mitigation framework applicable to sensitive habitats and habitat restoration opportunity areas throughout the planning region. As described in Section 4.3, *Biological Resources*, this includes project-level biological resource screening and assessment (BIO-1(a)); avoidance and minimization of impacts to special-status species and habitats (BIO-1(c), BIO-1(e), and BIO-1(f)); restoration plans, conservation easements, and compensatory mitigation for affected habitats (BIO-1(c) and BIO-1(e)); wetland, drainage, and riparian habitat restoration requirements (BIO-2(b)); sensitive vegetation community avoidance and restoration (BIO-2(d)); and measures to maintain wildlife movement and habitat connectivity (BIO-3(a) and BIO-3(b)). These measures require future implementing agencies to avoid impacts where feasible, minimize impacts through project design, and provide habitat restoration or other compensatory mitigation where impacts cannot be avoided. Accordingly, the Draft PEIR addresses avoidance and mitigation of impacts to habitat resources and restoration opportunities through the biological resources mitigation framework. Additionally, please see Response 4.6 below. The comment does not raise an issue regarding the adequacy of the environmental analysis. No further response is required.

Response 4.4

The commenter notes that the Council has not identified any inconsistencies between the 2026 RTP/SCS and Delta Plan regulatory policy ER P3 which governs the protection of PHRAs. The comment does not raise an issue regarding the adequacy of the environmental analysis requiring revision. No further response is required.

Response 4.5

The commenter states that no inconsistency of the 2026 RTP/SCS with the Delta Plan has been identified; no further response is required.

Response 4.6

The commenter notes that the DEIR does not directly acknowledge consistency with the Delta Plan regulatory policy DP P1. To more accurately describe the applicable regulatory framework, the following has been added to Section 4.12.2, Page 4.12-3 of Section 4.12, *Land Use*:

“Numerous federal, State, and local laws, regulations, policies, programs, plans, codes, and ordinances regulate land use in the SJCOG region. Local land use issues are regulated by the general plans, specific plans, and zoning ordinances adopted by San Joaquin County and the incorporated cities within the County. In addition, portions of San Joaquin County are located within the Sacramento-San Joaquin Delta, where implementation of certain projects may be subject to applicable Delta Plan policies administered by the Delta Stewardship Council, including Delta Plan Regulatory Policy DP P1, which is intended to ensure that regional and local planning efforts are based on adopted land use plans and growth forecasts and do not facilitate unplanned growth patterns that could adversely affect Delta resources. The SJCOG region itself is landlocked, surrounded by Sacramento County to the north, Stanislaus County to the south, Calaveras County and Amador County to the east, and Contra Costa County and Alameda County to the west. Thus, it is not within the immediate proximity of any local, state, or national coastal zones.”

As noted in the commenter's letter and as independently assessed by SJCOG, the 2026 RTP/SCS uses established population, housing, and employment growth forecasts and relies on land use assumptions reflected in locally adopted General Plans and Housing Elements. The 2026 RTP/SCS does not propose new development areas, amend local land use plans, or include infrastructure extensions intended to induce unplanned growth in the Secondary Zone of the Delta. Rather, the RTP/SCS is a regional transportation planning document that identifies transportation needs and investments based on growth already anticipated by local jurisdictions. In addition, adoption of the 2026 RTP/SCS does not authorize construction of any individual transportation or development project. Future projects identified in the RTP/SCS would be subject to separate project-level review, approvals, and environmental analysis, as appropriate. Therefore, because the 2026 RTP/SCS relies on established growth forecasts, locally adopted planning documents, and planned growth patterns, it would be consistent with the projected and planned growth anticipated under Delta Plan Regulatory Policy DP P1. As assessed and identified on page 4.12 of the DEIR, land use impacts would be less than significant after implementation of the mitigation measures identified in Chapter 4 of this EIR. The proposed 2026 RTP/SCS would not result in a physical change to the environment that has not already been addressed in the other resource chapters of this EIR. No further response is required.

Response 4.7

The commenter concurs with the information and findings provided in the DEIR and has not identified any inconsistency of the 2026 RTP/SCS with the Delta Plan recommendations. The comment does not raise an issue regarding the adequacy of the environmental analysis. No further response is required.

Response 4.8

The commenter summarizes the findings of the comment letter and notes that the Delta Plan and 2026 RTP/SCS are complementary in nature. The comment does not raise an issue regarding the adequacy of the environmental analysis. No further response is required.

Mary Elizabeth Public Letter 5

SJCOG Public Hearing on July 9, 2026; Public Comments from Mary Elizabeth

The following comments were made by Mary Elizabeth at the July 9, 2026 public hearing held by SJCOG. Transcribed from an audio recording of the hearing.

- 5.1 Extreme heat impact on roads with no mention of using trees to shade roads and expansion of metal on train tracks causing impacts.
- 5.2 Environmental Justice section failed to recognize the co-existence of disadvantaged communities near major roads. Airports create significant sources of air pollution.
- 5.3 Vegetative barriers are effective to mitigate air quality impacts.
- 5.4 There are wildfires in San Joaquin County, especially in Tracy Hills area. Urban fires create a toxic atmosphere.
- 5.5 A great emphasis on projects that are sprawl inducing and increase warehouses in south Stockton.

Public Hearing Comments (Communication 5)

Commenter: Mary Elizabeth, Stockton Resident, Delta Sierra Conservation Team

Date: July 9, 2026

Response 5.1

The commenter identified extreme heat impacts on roads with no mention of using trees to shade roads and expansion of metal on train tracks causing impacts. The commenter does not identify an environmental issue related to EIR adequacy or provide evidence demonstrating that additional analysis of roadway shading measures or heat effects on rail infrastructure is required under CEQA. These impacts would be addressed at the project level for applicable projects where these issues are identified as a potential CEQA impact. Mitigation, such as planting shade trees for road projects can be considered and assessed during project specific CEQA analyses. The EIR satisfies CEQA's informational requirements. No further response is required.

Response 5.2

The commenter states that the EIR's Environmental Justice section failed to recognize the co-existence of disadvantaged communities near major roads. The commenter noted that airports create significant sources of air pollution that could impact Environmental Justice communities. The EIR evaluates the project's impacts on affected communities in Section 4.7, *Environmental Justice*, including air quality impacts, and identifies mitigation where required. This analysis did not identify a disproportionate effect on EJ populations compared to the non-EJ population (page 4.7-9). This applies to major roads and airports. The EIR satisfies CEQA's informational requirements. No further response is required.

Response 5.3

The commenter stated that vegetative barriers are effective to mitigate air quality impacts. Air Quality impacts are discussed in Section 4.2 of the DEIR, pages 4.2-1 through 4.2-40. Mitigation Measure AQ-3(b) on page 4.2-32 lists planting trees and vegetation as mitigation:

- Plant trees and/or vegetation suited to trapping roadway air pollution and/or install 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.

It is also listed in Mitigation Measure AQ-5 on page 4.2-37:

- If impacts result in increased risks to sensitive receptors above significance thresholds, plant trees and/or vegetation suited to trapping TACs and/or install sound walls between sensitive receptors and the pollution source.
- 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.

No further response is required.

Response 5.4

The commenter states that wildfire risk exists in San Joaquin County with an increase in the Tracy Hills area. The commentor also states that urban fires can create a toxic atmosphere. Section 4-16 in the EIR acknowledges and discussed the potential risk of wildfires in San Joaquin County. Specifically, page

4.16-1 characterizes wildfire risks in the SJCOG region. As well, Figure 4.16-1 on page 4.16-2 identifies the areas adjacent to the City of Tracy that are identified as Fire Hazard Severity Zone. These areas are mainly within the foothills east of the Tracy Hills area that the commentor is referring to. The EIR identifies the nearest State Responsibility Area (SRA) to Tracy Hills which is less than 0.25-mile from the central portion of the community of Tracy. The information requested is included in the EIR as noted. The EIR satisfies CEQA's informational requirements for disclosing wildfire impacts. No further revision to the EIR is required. CEQA's threshold for assessing the significance of wildfires is the project's location in or near a SRA. Urban areas are generally not identified as an SRA. The EIR does address potential hazards that could occur in an urban area. Impact HAZ-1 on page 4.10-13-20 discusses potential hazards from the project including fires in an urban setting that could result from the project. These sections demonstrate consistency with CEQA requirements for addressing wildfires and hazards from fires that could occur in an urban setting and no further response is required.

Response 5.5

The commentor states that the project has a great emphasis on projects that are sprawl inducing and increase warehouse construction in South Stockton. The commentor did not identify specific projects listed in the Regional Transportation Plan that induce sprawl or specifics in the Sustainable Community Strategy that would induce sprawl or increase warehouses in South Stockton. The comment does not raise an issue regarding the adequacy of the environmental analysis. Chapter 2 of the EIR, Section 2.4 starting on page 2-7, describes the project. The RTP funds numerous transportation projects including transit, road repair, and projects that increase capacity. The project description states: "The Hybrid Preferred strategy commits to transit service expansion as new revenue sources become available, (1) identifying when transit enhancements are actually needed through quantitative triggers, and (2) protecting existing funding for competing local demands, such as street and road maintenance." (page 2-7).

It also explains the following about the project:

The broad policies that were carried over from the 2022 RTP/SCS into 2026 are listed below.

- Maximize mobility, accessibility, and efficiency in the transportation system.
- Promote interagency coordination and public participation for transportation decision-making and planning efforts.
- Support a safe, efficient, and secure transportation network for the movement of people and goods.
- Invest in a sustainable workforce development system.
- Maximize economic prosperity.
- Promote advanced tools and resources to improve quality of life.
- Support the development of diverse and affordable housing types and growth strategies.
- Enhance the quality of life for existing and future generations.
- Promote energy conservation and efficiency in transportation, infrastructure, and land use to reduce consumption and emissions.
- Integrate public health considerations into planning and development.

As described in the Project Description, the RTP/SCS includes policies that support sustainable growth, diverse housing opportunities, energy conservation, transit investments, and coordinated land use and transportation planning, counter to sprawl induced projects. Accordingly, the comment does not identify any concerns regarding the adequacy of the environmental analysis in the EIR. No further response is required.

California Department of Transportation

DISTRICT 10
OFFICE OF METROPOLITAN PLANNING
P.O. BOX 2048 | STOCKTON, CA 95201
(209) 483-2582 | TTY 711
www.dot.ca.gov

Letter 6



August 3, 2026

Diane Nguyen
Executive Director
San Joaquin Council of Governments
555 E Weber Ave
Stockton, CA 95202

Dear Ms. Nguyen:

The California Department of Transportation (Department) commends SJCOG for drafting a comprehensive RTP. It is evident that a great level of thought and effort was put into drafting this RTP, outlining a thoughtful plan and vision for the San Joaquin County region over the next 25 years. The Department has the following comments:

- There are several checklist items where a Chapter, EIR, and or Appendix are referenced, but did not provide specific page numbers. When feasible, please include the specific page numbers where the checklist items are found.
- Format the "Revenue Assumptions, Transportation Investments, and future of transportation funding" image so the titles are not cut off in Chapter 4, Page 3.
- Please consider identifying and listing the name of the high-density areas on the U-5 and U-6 maps in Appendix U.

The following comments reference various sections of the RTP Checklist and the responses provided by SJCOG :

General

1. Checklist Item #5 - Please provide information regarding project intent i.e. plan level purpose and need statements in Chapter 1.

Consultation/Coordination

1. SJCOG's commitment to regional collaboration with the Department, and the San Joaquin Regional Climate Collaborative has been a strong foundation. The

Department encourages continued stakeholder engagement and cross-jurisdictional coordination for climate resilience projects.

6.6
cont.

2. Checklist Item #2 - The summary, analysis and report of the disposition of significant written and oral comments received on the draft regional plan could not be found in Appendix c or the FTIP. Also, Appendix D is mentioned but is missing on the SJCOG draft RTP link/website. Please revise the RTP and checklist accordingly.

6.7

3. Checklist Item #3 - Recommendation - Consider including language regarding consultation and coordination with freight representatives to be included in preparation of the RTP Chapter 2, Page 6.

6.8

4. Checklist Item #6 – The checklist indicates that the EIR include a comparison with the California State Wildlife Action Plan. However, this information could not be found. Please revise the RTP/EIR and checklist accordingly.

6.9

Financial

1. Checklist Item #7 - The checklist indicates that Chapter 4, Page 8 includes a consistency between projects in the RTP and ITP. However, this information could not be found. Please revise the RTP and checklist accordingly.

6.10

2. Checklist Item #8 - The checklist indicates that Chapter 4 Page 8 includes a consistency statement between projects in the RTP and the RTIP. However, this information could not be found. Please revise the RTP and checklist accordingly.

6.11

Aeronautics

1. Aeronautics provides an Airport Land Use Compatibility training program which is available, upon request, to San Joaquin County staff as well as officials regarding airport land use planning. This program is designed to familiarize participants with the airport land use compatibility process, criteria, and to address any specific questions or concerns that officials or planning staff may have.

6.12

2. Aeronautics recommends that regional planning agencies prepare, when appropriate, to address the following areas of future focus:

- Advanced Air Mobility (AAM) Services
- Electric Aviation and wayside equipment for electrified aircraft.

6.13

- Sustainable Aviation Fuel (SAF), currently in the testing stages for commercial aircraft, but will eventually trickle down to general aviation.

6.13
cont.

Freight

1. Based on the RTP, several developing projects have been identified that reflect local priorities and focus on sustainable transportation options. However, at this time, no details have been specified as to the timeline of the short-range and long-range projects. When these projects are ready for implementation, San Joaquin County may consider submitting a request identifying the need for the proposed improvement to the Caltrans District 10 (D10) System Planning and Goods Movement (SPGM) branch. At that time, D10 SPGM will review and evaluate the proposed improvement, to determine if it is consistent with District's policies, practices, and any unique highway operations or safety considerations.
2. If applicable, it is recommended that consistency be maintained when providing the details of the list of the short and long-range projects. Some of the projects have incomplete information. Linking each project to measurable transportation outcomes, state performance goals, project readiness, and state highway system priorities can help strengthen the RTP. Adding data sources, standardized performance metrics and implementation information can improve its usefulness for future funding and planning decision and make the RTP more of a valuable planning tool.

6.14

6.15

It was evident that SJCOG developed a strong engagement strategy for the Regional Transportation Plan and demonstrated a clear commitment to engaging the community throughout the planning process.

6.16

We look forward to continuing to work closely with SJCOG on these very important plans and projects and helping to improve and provide a safe reliable transportation network. If you would like to discuss these comments in more detail, please contact Tom Dumas, Branch Chief Metropolitan Planning at tom.dumas@dot.ca.gov or by phone at (209) 483-2582.

6.17

Sincerely,



Caleb Brock
Deputy District Director
Planning, Local Assistance & Environmental Support

Ms. Diane Nguyen
July 30, 2026
Page 4

cc: Silvia Dayak, Office Chief, Transportation Planning
Tom Dumas, Branch Chief, Metropolitan Planning
Joshua Swearingen, Associate Transportation Planner, Metropolitan Planning

6.17
cont.

Letter 6

Commenter: Caleb Brock, Deputy District Director, Planning, Local Assistance & Environmental Support, California Department of Transportation (Caltrans)

Date: August 3, 2026

Comments 6.1 through 6.8 and 6.10 through 6.17 are comments that do not specifically raise environmental issues related to the Draft EIR nor relate directly to the adequacy of the information or analysis within the Draft EIR, and therefore no response is required, pursuant to State CEQA Guidelines Sections 15088 and 15132. We have nonetheless provided a summary of each comment and acknowledgement that it has not brought up a concern regarding adequacy of the EIR.

Response 6.1

The commenter commends SJCOG for preparing a comprehensive RTP and acknowledges the effort invested in developing a long-range vision for the San Joaquin County region. The comment is supportive of the RTP/SCS and does not identify any concerns regarding the adequacy of the environmental analysis in the EIR. No further response is required.

Response 6.2

The commenter recommends including specific page numbers for referenced chapters, EIR sections, and appendices in the environmental checklist where feasible to improve document usability and clarity. The comment pertains to document organization and does not raise an issue regarding the adequacy of the environmental analysis in the EIR. No further response is required.

Response 6.3

The commenter recommends revising the formatting of the “Revenue Assumptions, Transportation Investments, and Future of Transportation Funding” figure in Chapter 4, Page 3 to ensure that all titles are fully visible. The comment relates to document formatting and presentation and does not raise an issue regarding the adequacy of the environmental analysis in the EIR. No further response is required.

Response 6.4

The commenter recommends identifying and labeling the names of high-density areas on the U-5 and U-6 maps in Appendix U to improve map clarity and usability. The comment pertains to document presentation and does not raise an issue regarding the adequacy of the environmental analysis in the EIR. No further response is required.

Response 6.5

The commenter requests that Chapter 1 include information regarding project intent, such as plan-level purpose and need statements, in response to RTP Checklist Item #5. The comment seeks clarification and additional information regarding project description and documentation and does not raise an issue regarding the adequacy of the environmental analysis in the EIR. No further response is required.

Response 6.6

The commenter acknowledges SJCOG’s commitment to regional collaboration with Caltrans and the San Joaquin Regional Climate Collaborative and encourages continued stakeholder engagement and interjurisdictional coordination for climate resilience projects. The comment is supportive and does not identify any concerns regarding the adequacy of the environmental analysis in the EIR. No further response is required.

Response 6.7

The commenter notes that the summary, analysis, and disposition of significant written and oral comments on the draft regional plan could not be located in Appendix C or the FTIP and that Appendix D appears to be missing from the draft RTP website. The commenter requests revisions to the RTP and checklist to clarify and provide the referenced materials. Comments and responses were added after the public review period as part of preparation of the final RTP/SCS, and the referenced appendices were subsequently included in the final draft document package. The comment discusses completeness and accessibility of the draft RTP website and does not raise an issue regarding the adequacy of the environmental analysis in the EIR. No further response is required.

Response 6.8

The commenter recommends including language in Chapter 2, Page 6 documenting consultation and coordination with freight representatives during preparation of the RTP, consistent with RTP Checklist Item #3. The comment seeks additional information regarding the planning process and stakeholder involvement and is not a comment on the EIR and does not raise an issue regarding the adequacy of the environmental analysis in the EIR. No further response is required.

Response 6.9

The commenter notes that RTP Checklist Item #6 indicates the EIR includes a comparison with the California State Wildlife Action Plan, but this information could not be located. The commenter requests revisions to the RTP/EIR and checklist to identify and provide the referenced comparison. A new subsection titled "California State Wildlife Action Plan" has been added to the regulatory framework, Section 4.3.2, b, Page 4.3-17 of Section 4.3, *Biological Resources*:

The California State Wildlife Action Plan

The California State Wildlife Action Plan is a statewide, non-regulatory conservation strategy developed by the CDFW to identify and conserve Species of Greatest Conservation Need and their habitats before they become threatened or endangered. The California State Wildlife Action Plan evaluates the condition of California's fish, wildlife, and plant resources, identifies key threats to biodiversity, and recommends conservation actions to protect and restore habitats throughout the state. The plan serves as a guide for collaborative conservation efforts and is updated every ten years to maintain eligibility for federal State Wildlife Grant funding.

No further response is required.

Response 6.10

The commenter notes that RTP Checklist Item #7 indicates Chapter 4, Page 8 includes a demonstration of consistency between projects in the RTP and the Interregional Transportation Plan, but this information could not be located. The commenter requests revisions to the RTP and checklist to identify and provide the referenced information. The comment concerns RTP document consistency and completeness and does not raise an issue regarding the adequacy of the environmental analysis in the EIR. No further response is required.

Response 6.11

The commenter notes that RTP Checklist Item #8 indicates Chapter 4, Page 8 includes a consistency statement between projects in the RTP and the Regional Transportation Improvement Program, but this information could not be located. The commenter requests revisions to the RTP and checklist to identify and provide the referenced information. The comment concerns RTP document consistency and completeness and does not raise an issue regarding the adequacy of the environmental analysis in the EIR. No further response is required.

Response 6.12

The commenter notes that Caltrans Aeronautics offers an Airport Land Use Compatibility training program for San Joaquin County staff and officials. The program is intended to provide information regarding airport land use compatibility processes and criteria and to address questions related to airport land use planning. The comment is informational and does not raise an issue regarding the adequacy of the environmental analysis in the EIR. No further response is required.

Response 6.13

The commenter recommends that regional planning agencies consider addressing emerging aviation technologies and trends in future planning efforts, including Advanced Air Mobility services, electric aviation and associated infrastructure, and Sustainable Aviation Fuel. The comment provides recommendations for future planning considerations and does not raise an issue regarding the adequacy of the environmental analysis in the EIR. No further response is required.

Response 6.14

The commenter notes that the RTP identifies several developing transportation projects that reflect local priorities and support sustainable transportation options. The commenter advises that San Joaquin County may coordinate with Caltrans District 10 System Planning and Goods Movement staff to evaluate proposed freight improvements for consistency with district policies, operational requirements, and safety considerations. The comment is advisory and does not raise an issue regarding the adequacy of the environmental analysis in the EIR. No further response is required.

Response 6.15

The commenter recommends maintaining consistency and completeness in the presentation of short-range and long-range projects within the RTP. The commenter suggests including information related to transportation outcomes, state performance goals, project readiness, state highway system priorities, data sources, performance metrics, and implementation details to enhance the RTP's value as a planning and funding tool. The comment provides recommendations for improving project documentation and does not raise an issue regarding the adequacy of the environmental analysis in the EIR. No further response is required.

Response 6.16

The commenter acknowledges SJCOG's comprehensive public outreach efforts and commends the agency's commitment to engaging the community throughout development of the Regional Transportation Plan. The comment is supportive and does not identify any concerns regarding the adequacy of the environmental analysis in the EIR. No further response is required.

Response 6.17

The commenter expresses support for SJCOG's planning efforts and indicates a desire to continue collaborating on future transportation plans and projects. The comment concludes with contact information for follow-up discussion and identifies the author and copied recipients. No further response is required.

Letter 7

August 4, 2026

Edith Verdin, Senior Regional Planner
San Joaquin Council of Governments
555 East Weber Avenue
Stockton, CA 95202

Re: Notice of Availability of a Draft Program Environmental Impact of the Draft 2026
Regional Transportation Plan/Sustainable Communities Strategy, San Joaquin
County

Dear Ms. Verdin:

East Bay Municipal Utility District (EBMUD) appreciates the opportunity to comment on the Draft Program Environmental Impact Report (EIR) for the Draft 2026 Regional Transportation Plan/Sustainable Communities Strategy (Plan) which encompasses the entire San Joaquin County (County). EBMUD has the following comments.

7.1

EBMUD AQUEDUCTS

EBMUD's Mokelumne Aqueducts (Aqueduct) right-of-way (owned in fee) traverse through the County (see enclosed map of EBMUD Aqueducts in San Joaquin County). Any individual project within the Plan being planned within or immediately adjacent to EBMUD property will need to follow EBMUD's Procedure 718 – Authorized Uses of Pipeline Rights-of-Way. A copy of the procedure is enclosed for your reference.

7.2

For all individual projects within the Plan, design drawings for any project encroachment (roadway, utility, facility, etc.) crossing or within the Aqueduct right-of-way will need to be submitted to EBMUD for review of possible drainage, site grading, fencing, construction access, and other conditions that may impact EBMUD property. EBMUD requires a full set of drawings (full size or 11" x 17") as well as an electronic copy in PDF format. All submittals shall be sent to the attention of Doug A. Hooper, Superintendent of Aqueduct Section, 1804 West Main Street, Stockton, CA 95203. Additional information and an encroachment package are included in EBMUD's Procedure 718. Applications for non-EBMUD uses will not be processed unless accompanied by the appropriate application fees outlined in the current applicable Water and Wastewater System Schedule of Rates and Charges and Fees. Contractors must secure an encroachment permit from EBMUD Aqueduct Section prior to mobilizing and starting construction work. A pre-construction meeting with EBMUD is mandatory.

7.3

7.4

7.5

When a project involves the construction of a retaining wall and fence along the property line, they must be constructed completely outside of EBMUD property, including all footings. The individual project sponsor for projects within the Plan area shall contact

7.6

EBMUD's Survey Section to coordinate identifying, locating and marking correct property lines.

**7.6
cont.**

FISHERIES AND WILDLIFE

On page 4.3-36, under Impact BIO-3, the Draft Program EIR identifies impacts to wildlife movement, including fish migration, as significant and unavoidable, but the post-mitigation discussion focuses largely on terrestrial wildlife. The potential impact on fish migration, and whether additional fish-specific measures are warranted, should be clarified.

7.7

On page ES-14, under Executive Summary, the Draft Program EIR identifies a typical dry-season work window of June 1 through November 1, while on page 4.3-26, under Biological Resources, the Draft Program EIR identifies April 1 through October 31 as the dry-season work window. These references should be reconciled for consistency throughout the Draft Program EIR. In addition, the Draft Program EIR should clarify that actual in-water work windows will be determined at the project level in consultation with applicable regulatory agencies, based on affected species and life stages, site conditions, and agency requirements.

7.8

7.9

If you have any questions concerning this response, please contact Sandra Mulhauser, Senior Civil Engineer, Major Facilities Planning Section at (510) 287-7032.

Sincerely,

7.10



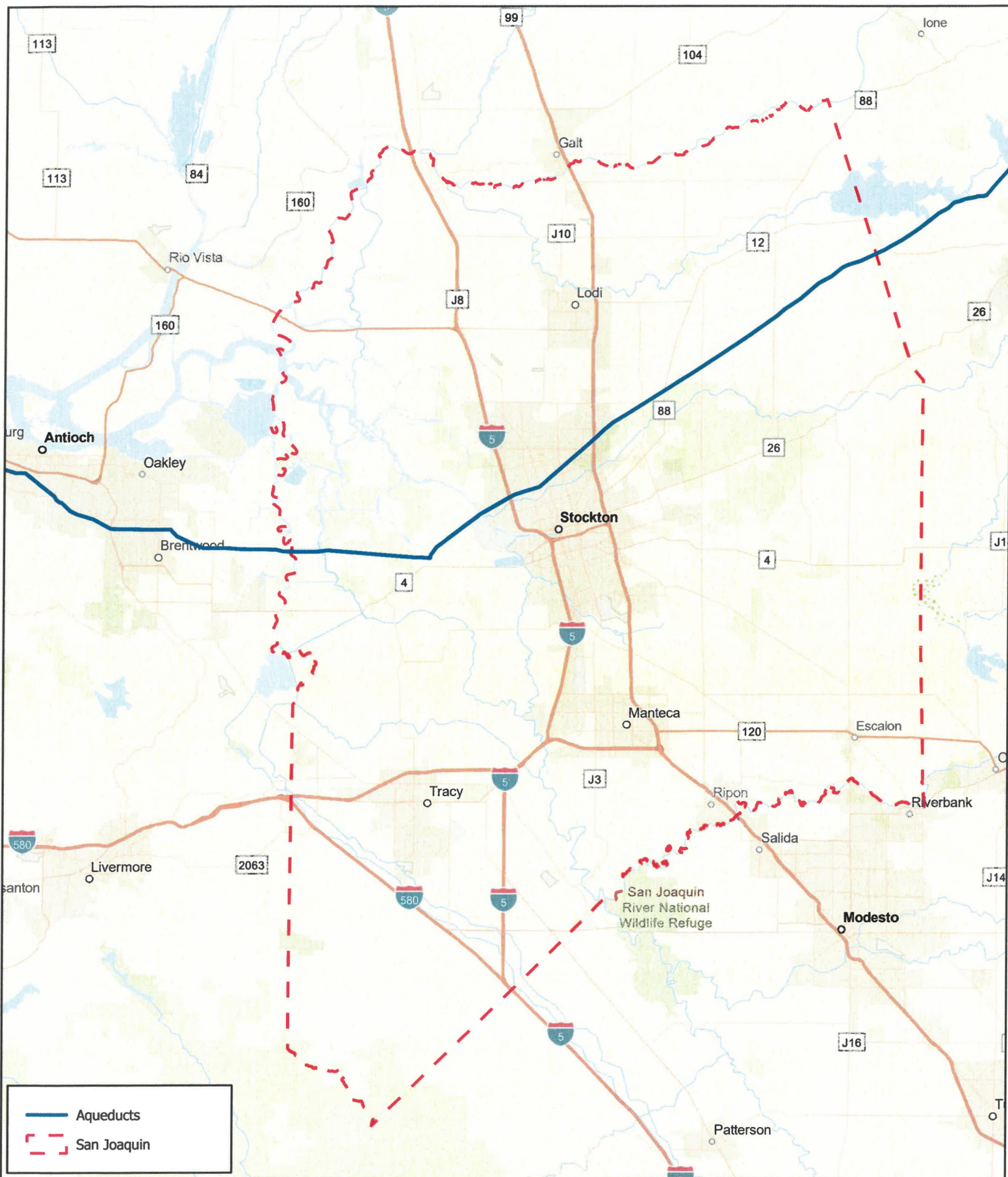
David J. Rehnstrom
Manager of Water Distribution Planning

DJR:WTJ:kn
wdpd26_San Joaquin Regional Transportation Plan.doc

7.11

Attachment: Map of EBMUD Aqueducts
Procedure 718 – Authorized Uses of Pipeline Rights-of-Way

7.12



Map of Aqueducts

San Joaquin County



Procedure 718

EFFECTIVE 13 DEC 22

SUPERSEDES 08 JUL 20

LEAD DEPARTMENT O&M

AUTHORIZED USES OF PIPELINE RIGHTS-OF-WAY

PURPOSE – To establish procedures and criteria for review and authorization of overhead, surface, and sub-surface use of District-owned and easement established property containing raw and distribution water aqueducts and pipelines (“pipelines”) for purposes other than installation, maintenance, and operation of District pipelines.

Forms Used

L-14	Limited Land Use Permit
K-47	Work Request Agreement
N-15	Certificate of Public Liability Insurance
N-17	Certificate of Workers' Compensation Insurance
	Application for Use of EBMUD Property or Request for Information
	General Fund Receipts for Miscellaneous Payments

Authority and Responsibility

Use, development, and control of fee-owned and easement established rights-of-way for District and non-District uses must be consistent with the District's operations, maintenance, security, and the rights and obligations of the District. District and non-District uses of District-owned pipeline rights-of-way may be permitted, at the District's sole discretion, only if the uses conform to Policy 7.01 - Aqueduct and Distribution Pipeline Rights-of-Way Maintenance and the requirements of this Procedure.

- No use of District pipeline rights of way or property by others will be permitted as a condition to meet city/county zoning requirements or to obtain any land use permit, approval, or entitlement affecting properties not owned by the District.
- No use of District properties by others will be permitted except under terms of a written agreement.
- Use of pipeline rights-of-way for District purposes shall have the concurrence of the Director of Operations and Maintenance and shall include all applicable protections required for similar third-party use.
- The Board of Directors has exclusive authority to approve any proposed right-of-way use requiring the adoption and implementation of one or more mitigation measures to minimize potentially significant environmental impacts.
- The decision whether to authorize any party other than the District to use District-owned property containing pipelines for any non-District purpose is a legislative act undertaken at the sole discretion of District staff. No notice or hearing is required to consider an application for use of such property, and staff's decision is not subject to appeal.

Acceptable long-term uses of the pipeline rights-of-way include but are not necessarily limited to: utility crossings, road crossings, limited agriculture, equestrian and pedestrian trails, parks, oil and gas leases, and District-owned ground water wells. Acceptable long-term uses of rights-of-way and easements for future pipelines will be evaluated upon facility completion. Such uses will be authorized in writing. All approved uses will conform to the requirements and limitations described in the attached EBMUD Requirements for Entry or Use of Pipeline Rights-of-Way (Requirements for Entry or Use) and all other conditions as specified in the written approval.

The Water Supply Division and the Water Treatment and Distribution Division are each primarily responsible to implement this Procedure with respect to proposed uses of rights-of-way containing a facility “owned” by that Division. Facility “ownership” for this purpose is determined based on which Division has “Overall Responsibility” for the facility according to Table 1 of Procedure 706 – Facilities: Inspection, Maintenance and Repair. Wherever this Procedure allocates responsibility to both Divisions in the

alternative, the responsibility shall rest with the Division which owns the facility within the right-of-way which is proposed to be used.

The Water Supply or the Water Treatment and Distribution Divisions are responsible for monitoring permitted uses and detecting and preventing unauthorized uses of pipeline rights-of-way, respectively.

The Office of General Counsel and the Manager of Real Estate Services will be consulted when an unauthorized user will not voluntarily desist.

The Water Supply or the Water Treatment and Distribution Divisions are responsible for coordinating the development of recommendations with respect to the terms and conditions to be stipulated when a District or non-District use of a pipeline right-of-way is to be permitted.

The Director of Engineering and Construction shall be consulted as necessary to provide location analysis or to determine what structural, grading, drainage, corrosion protection or other engineering measures are required and to obtain estimates of engineering, design and inspection costs.

Inquiries and Applications for Use

Applications and inquiries for use of pipeline rights-of-way shall be processed by the Water Operations Department. Applications for non-District uses will not be processed unless accompanied by the appropriate application fees specified in the District's "Water and Wastewater System Schedules of Rates and Charges, Capacity Charges, and Other Fees".

The **Water Operations Department** is responsible for:

- Providing requirements for use of the District's pipeline rights-of-way to applicants requesting use of the right-of-way. See the attached Requirements for Entry or Use.
- Providing requirements to applicants for proposed work located adjacent to the District's pipeline rights-of-way which has the potential to impact the District's pipelines (e.g., proposed excavations that may include use of tiebacks that could result in a vertical encroachment and/or excavations that have the potential for ground movements that could damage District pipelines).
- Checking for completeness of any permit (e.g., Encroachment Permit Application) to ensure compliance with the requirements for entry or use of pipeline rights-of-way contained in Requirements for Entry or Use plus any other conditions applicable to the proposed use.
- Collecting engineering, plan review and construction inspection costs and documentation of insurance coverage, if necessary.
- Monitoring existing encroachments and inspection of the construction of new approved encroachments.
- Providing information to the Engineering and Construction Department for technical input regarding additional permit requirements or special restrictions that may be applicable (in addition to those outlined in the Requirements for Entry or Use).
- Assuring proper environmental documentation for proposed uses through consultation with the Water Distribution Planning Division, when appropriate. Policy 7.01 - Aqueduct and Distribution Pipeline Rights-of-Way Maintenance, requires the District to ensure that any construction impacts from third-party use of District rights of way are mitigated to the level of "no significant impact."

Real Estate Services is responsible for:

- Advising the Manager of Water Supply or the Manager of Water Treatment and Distribution of any real estate matters which relate to a specific proposed use.
 - Collecting application fees and charges, preparing and executing limited land use permits, leases, easements, and all other property-related agreements (except for revocable licenses and temporary entry permits) and recommending fees and charges appropriate to the property use allowed, and for securing payment. See the current applicable Water and Wastewater System Schedule of Rates and Charges and Fees.
 - Maintaining records relating to rights-of-way crossings and use, and providing information to the Engineering and Construction Department for the update of District pipeline drawings and GIS applications.
-

**Types of Permit
License or
Easement**

The Manager of Water Supply or Manager of Water Treatment and Distribution shall keep available the forms listing the general requirements set forth in Requirements for Entry or Use for each of the following:

Temporary Entry/Temporary Construction Permit

For temporary access to pipeline rights-of-way such as for surveying, potholing, construction, for temporary access via the District's right-of-way to property adjacent to the right-of-way, and other similar short-term situations.

Revocable License and Revocable Landscape License

For pipelines, sewers, storm drains, overhead and underground cables, public trails, landscaping and other crossings or lateral encroachments.

Limited Land Use Permit

Provides for agricultural or other surface use of the right-of-way for a period not to exceed one year (vehicular parking is prohibited). These permits are renewable annually if inspection reveals satisfactory conformance to conditions of permit.

Easement

For streets, highways, large diameter pipelines, canals and railroads, and other permanent publicly-owned encroachments. Easements are officially recorded with the county having jurisdiction. The consideration for the easement (e.g., fee) will be based on the value of the property being encumbered.

The Manager of Water Supply or Manager of Water Treatment and Distribution shall request review of any proposed revisions to application forms and lists of requirements from the Engineering and Construction Department, Real Estate Services Division, Office of General Counsel, and the District's Pipe Committee.

**Processing
Applications**

Temporary Entry Permits and Temporary Construction Permits

The Manager of Water Supply or Manager of Water Treatment and Distribution (or designee) may issue temporary entry and construction permits including imposing standard and temporary conditions relating to the use. The Manager of Real Estate Services and the Office of General Counsel will be consulted regarding unusual circumstances.

Revocable Licenses

The Manager of Water Supply or Manager of Water Treatment and Distribution (or designee), if warranted, shall conduct a field investigation to determine pipeline protection requirements and in consultation with the Design Division or the Pipeline Infrastructure Division, will set forth the engineering and operating requirements.

The Manager of Water Supply or Manager of Water Treatment and Distribution (or designee), shall then specify any and all requirements, including special conditions to the applicant, and discuss the terms and conditions of the license agreement as well as any processing, design and inspection costs and license fee. The Manager of Water Supply or Manager of Water Treatment and Distribution may then enter into a standard license agreement with relevant special conditions on behalf of the District. The Manager of Real Estate Services and the Office of General Counsel shall be consulted regarding any unusual circumstances.

Copies of all revocable licenses issued by the Water Supply Division or the Water Treatment and Distribution Division shall be provided to the Manager of Real Estate Services.

Copies of all licenses or leases issued by the Manager of Real Estate Services on Pipeline Rights-of-Ways shall be provided to the Water Supply Division or the Water Treatment and Distribution Division.

Limited Land Use Permits

The Manager of Water Supply or Manager of Water Treatment and Distribution (or designee), shall convey the District's requirements to the applicant and investigate to determine any special conditions.

Real Estate Services shall prepare the Limited Land Use Permit (Form L-14) in duplicate, including special conditions or stipulations, accompanied by a District-prepared location sketch that will refer to pipeline stationing and other appropriate location identifiers, including adjacent pipeline structures.

Engineering and Construction Department shall prepare the location sketch.

After payment of the stipulated consideration determined by Real Estate Services, the Manager of Water Supply or Manager of Water Treatment and Distribution (or designee) shall review and execute the permit. These copies are then returned to the Manager of Real Estate Services, together with any stipulated consideration.

Forty-five days before expiration of a Limited Land Use Permit, the Manager of Real Estate Services shall notify the Manager of Water Supply or Manager of Water Treatment and Distribution, who shall investigate the permittee's operations. If renewal of the permit is recommended, the permit will be renewed by letter from the Manager of Real Estate Services.

Leases and Easements

The Water Supply or Water Treatment and Distribution Divisions shall conduct a field investigation to determine requirements for pipeline protection and, in consultation with the Design Division or Pipeline Infrastructure Division, if necessary, will set forth the engineering and operating requirements.

If structural or corrosion protective facilities are required, the Manager of Water Supply or Manager of Water Treatment and Distribution (or designee) shall request the Manager of Design Division or Pipeline Infrastructure Division to proceed with the required design or plan reviews. (During design, the designer will communicate with the applicant's engineer.) Upon completion of design, the plans will be delivered to the applicant via the Manager of Water Supply or Manager of Water Treatment and Distribution (or designee), who will arrange for inspection as required. The Manager of Real Estate Services shall discuss with the applicant the terms of the agreement and the amount of the consideration, including any processing, design, and inspection costs. Real Estate Services shall obtain an appraisal and engineering estimates, if necessary.

Upon agreement with the applicant, the Manager of Real Estate Services, shall draft, for review and approval by the Manager of Water Supply Division or the Manager of Water Treatment and Distribution Division and Office of General Counsel, an agreement granting the applicant the property interest under the terms and for the consideration as approved. Real Estate Services shall assure that evidence of insurance is provided, if required. The lease or easement shall be submitted to the District's Board of Directors for approval, if required by Procedure 108 - Real Estate Transactions. Two copies of the lease or easement shall be sent to the applicant with instructions to sign and return the copies, together with the consideration, to the Manager of Real Estate Services. Easements shall be recorded and the applicant shall provide the Manager of Real Estate Services with the recording data.

Approvals

District and non-District uses of pipeline rights-of-way shall be confirmed in writing, listing any special conditions which may apply to the proposed use to the requesting District departments or third parties by the Manager of Water Supply or Manager of Water Treatment and Distribution (or designee).

Terminations

Any third-party use of the District's pipeline property may be terminated at the District's sole discretion, so long as the termination is authorized by and done in a manner compliant with the terms and conditions of the permit, license, or lease that governs the use. If the Water Supply Division or the Water Treatment and Distribution Division terminates any permit or license, the Manager of Real Estate Services and the Design Division shall be so notified by memo. The Office of General Counsel may be consulted before undertaking a termination which may affect the District's legal interests.

Terms and Conditions

The final determination of generally applicable terms and conditions appropriate for District uses of pipeline properties rests with the Director of Operations and Maintenance.

A specific third-party applicant for use of pipeline property may be required, as a condition of approval of the application, to comply with the generally applicable terms and conditions, or with different or additional terms and conditions that are determined to be in the District's best interest. The decision to approve or deny an application, and the selection of terms and conditions of any approval, shall rest with the Director of Operations and Maintenance. There is no right to an administrative appeal or hearing, and the decision of the Director or designee is final.

Records

The Manager of Real Estate Services shall maintain a file containing copies of all documents relating to right-of-way crossings or uses, except for temporary encroachment permits, and is responsible for the assignment of right-of-way crossing numbers to approved documents.

The Engineering and Construction Department shall maintain as-built and right-of-way drawings and other information of pipelines. Updates to these drawings shall be made following:

1. Grant of Revocable License or Easement. Notice to be supplied by the Manager of Real Estate Services.
2. Completion of crossing construction covered by license or easement. Notice, including "as built" location data, to be supplied by the applicant to the Water Supply Division or Water Treatment and Distribution Division for transmittal to the Engineering and Construction Department. This notice will be routed through the Engineering and Construction Department, as necessary, then to the Manager of Real Estate Services.
3. Termination of any pipeline right-of-way use. Notice to be supplied by the Manager of Real Estate Services.

Drawings of right-of-way crossings and uses within the service area will be updated in GIS applications by Mapping Services based on information provided from Real Estate Services.

Required Fees

Pipeline right-of-way fees for the processing of applications and documents related to proposed uses are included in the "Water and Wastewater System Schedules of Rates and Charges, Capacity Charges, and Other Fees". The Manager of Water Supply and Manager of Water Treatment and Distribution are responsible for periodic review and updating of Requirements for Entry or Use. The Manager of Real Estate Services is responsible for review and updating of Fees and Documentation Charges, Use of Aqueduct and Distribution Pipeline Rights-of-Way by Others.

References

Policy 7.01 – Aqueduct and Distribution Pipeline Rights-of-Way Maintenance
Procedure 108 – Real Estate Transactions
Procedure 436 – Miscellaneous Accounts Receivable and Cash Receipts
Procedure 706 – Facilities: Inspection, Maintenance and Repair
Requirements for Entry or Use of Pipeline Rights-of-Way (attached)
Water and Wastewater System Schedules of Rates and Charges, Capacity Charges, and Other Fees (as updated periodically)



**EBMUD REQUIREMENTS FOR
ENTRY OR USE OF PIPELINE RIGHTS-OF-WAY**

East Bay Municipal Utility District

1. Requests for encroachment rights or for other uses of the District's raw and distribution water aqueduct and pipeline ("pipeline") properties shall be directed to the Manager of Water Supply, 1804 West Main Street, Stockton, California 95203. Property uses shall only be permitted subject to appropriate written permit, license, easement, or lease agreement.
2. Requests for property uses shall be in writing and accompanied by a completed application, application fees, plan and profile drawings of the area and work involved. District pipeline stationing and adjacent above-ground structures must be shown. Applicant's horizontal and vertical control must be correlated to the District's. Drawings and maps shall be ANSI D size (22x34 inch) or ANSI B size (11x17 inch) and must also be provided in electronic .pdf format. Application must include complete insurance documentation.
3. The applicant must indemnify, defend, and hold harmless the District and associated personnel from and against any claims, losses, and liability arising by reason of the applicant's use of District's property or the applicant's acts or omissions pursuant to any permit or approval issued by the District, on such terms as the District may require. The applicant may be required to provide evidence of insurance coverage.
4. All requests for uses of District property must be consistent with requirements and limitations set forth by Procedure 718 and will be reviewed and approved on a case-by-case basis.
5. District land and facilities shall be restored to a condition as good as that which existed before applicant's entry on the right-of-way.
6. Applicant's use of property shall not increase District costs or interfere with District access, operations, maintenance, or repair of its facilities.
7. The applicant must pay the District the appraised value of the easement or lease, if appropriate, for the rights granted to the applicant. Appropriate environmental documentation must be completed in accordance with the California Environmental Quality Act before the rights can be granted. The District may require the applicant to prepare the documentation at its expense before the application will be considered for approval. The District will review the environmental documentation to determine whether it (i) adequately describes the applicant's project, (ii) contains a detailed disclosure and analysis of the project's impacts, (iii) describes feasible measures to mitigate any construction impacts to the District's right-of-way to a level of no significant impact, and (iv) is otherwise legally sufficient. The District may rely on any existing environmental documentation for the applicant's project if the District determines that the existing documentation meets the above-described standards.
8. For any District-approved encroachment, the applicant must pay the District for any of the following measures, as determined necessary by the District:
 - a. Design of structural protective measures
 - b. Design of fences or other structures
 - c. Corrosion control protective measures
 - d. District engineering, plan review, and inspection of activities
 - e. Environmental documentation
 - f. Application, permit or license fees.
9. The plan for the execution of the work must be approved by the District.
10. The type and weight of equipment working over the pipelines must be approved by the District.
11. The use of vibratory compaction equipment is prohibited on the pipeline right-of-way unless otherwise approved by EBMUD. Allowable compaction effort, allowable equipment, and maximum depth of each lift of fill shall be subject to District review and approval before start of construction.
12. A minimum of 48 business hours' notice must be given to the District before work commences on District pipeline right-of-way. Contact information will be provided in permit.

13. A preconstruction meeting is required prior to start of work.
14. No building or portions of buildings shall be constructed on the property. No other types of structures shall be constructed unless specific approval is given by the District.
15. No longitudinal encroachments such as drainage ditches; gas, phone, or electrical lines; pipelines, or roads will be permitted. All property line fences (including footings) must be located completely outside District property lines.
16. District staff shall monitor pile driving or other work which can result in vibration and occurs within 100 feet of the aqueducts. District staff shall also monitor other work located within 100 feet of the pipeline right-of-way, if such work has the potential to result in ground movements that could damage the District's facilities (i.e., large excavations with potential for horizontal or vertical ground deformations within the District's rights-of-way).
17. Railroad, freeway and highway crossings of the pipeline right-of-way shall be on permanent bridges with a minimum vertical clearance of 14 feet 6 inches between the finished ground surface and the underside of the bridge. Crossings of pipeline rights of way, on grade will be over structurally-encased aqueducts with a sleeve for a fourth aqueduct.
18. Street and road crossings constructed on grade shall incorporate protection of the pipelines. Protective measures will be designed by applicant's licensed engineer to District standards with specific District approval of each design.
19. Existing pipeline protective measures such as concrete slabs shall not be cut, penetrated, or otherwise disturbed. If a protective measure is cut, penetrated, or disturbed, it shall be replaced with a new protective measure, designed by applicant's licensed engineer to District standards with specific District approval of design.
20. Traffic control fences or approved barriers shall be installed along each side of the street, road or trail before opening to the public.
21. Temporary construction fences and barricades shall be installed by contractor as directed by the District.
22. No geotechnical exploration such as drilling or boring shall be allowed on an pipeline right-of-way without prior written approval from the District.
23. Any changes in finished grade in the pipeline right-of-way must be approved by the Aqueduct Section. Earth fills or cuts on adjacent property shall not encroach onto District property except where authorized for vehicular crossings on grade and where the District determines that there will be no detrimental effect on or maintenance of the pipelines.
24. Crossings shall be perpendicular to the pipelines and on a constant grade across District property.
25. Sanitary sewers, water lines, petroleum product lines, or other lines crossing above the pipelines must be encased in a steel, polyvinyl chloride (PVC), or reinforced concrete pipe conduit or be imbedded in reinforced concrete with a minimum vertical clearance of two (2) feet between the casing/embedment and the top of District pipelines. The casing shall extend the entire width of the pipelines right-of-way.
26. All pipelines crossing below the pipelines must be encased in a steel or reinforced concrete conduit and provide a minimum of three (3) feet of clearance between the casing and the bottom of the District pipelines.

27. Trenchless construction methods such as horizontal directional drilling or jack-and-bore between the top of the pipelines and the bottom of the protective structure (slab) are prohibited.
28. On pressurized pipe crossings, shutoff valves shall be provided outside and adjacent to both sides of District property.
29. At the point of crossing, steel pipeline crossings and steel casings shall incorporate electrolysis test leads, bond leads, and leads necessary for interference testing. Corrosion control devices, when required, must be approved by the District.
30. Cathodic protection for steel encasements must be installed as follows:
 - Provide a dielectric coating to the exterior surface of the steel casing within the District's right-of-way, 16 mil epoxy or equivalent.
 - Provide galvanic protection to the portion of the steel casing within the District's right-of-way in accordance with the National Association of Corrosion Engineers RP-01-69.
 - If the carrier pipe is constructed of ductile iron or steel, provide electrical isolation between the carrier and casing using casing insulators; redwood skids are not permitted.
 - Provide test results to the District demonstrating the adequacy of the cathodic protection system, and the adequacy of the electrical isolation of the carrier (if metallic) from the casing. The District reserves the right to witness any such tests.
31. Gravity drainage of District property shall be maintained. Open channels constructed across the right-of-way shall be paved with reinforced concrete. Headwalls, inlets, and other appurtenances shall be located outside District property. Drainage facilities shall be provided outside the District's property at the top and/or toe of fill slopes or cuts constructed adjacent to District property to assure adequate drainage.
32. Overhead electrical power conductors across the property shall be a minimum of 30 feet above ground. Communication and cable TV crossings shall be a minimum of 20 feet above the ground. Supporting poles or towers shall be located outside the pipelines right-of-way.
33. Buried electrical cables passing over the pipelines shall be installed in PVC conduit and encased in red concrete across the entire width of the right-of-way. In some cases, PVC-coated steel conduit with a red concrete cap may be substituted. All other buried cables shall be installed in conduits and marked in the appropriate Underground Service Alert (USA) colored marking materials and with surface signs installed at 4-foot intervals that include the utility name, type, and emergency contact information across the entire width of the right-of-way. The minimum vertical clearance between the conduit and the top of the District's pipelines is two (2) feet.
34. Electrical or telecommunications cables shall not be allowed to pass under the pipelines.
35. Vehicular parking and storage of equipment or material on aqueduct or distribution pipelines property are prohibited.
36. All District survey monuments and markers shall be undisturbed. If any District survey markers or monuments must be disturbed, they will be replaced or relocated by the District at applicant's expense prior to the start of any ground disturbing work.
37. All pipeline crossings involving mechanical excavation on the right-of-way require potholing of all pipelines at the site of the proposed crossing. Visible reference markings showing the pipeline alignments and depths to top of pipe shall be maintained for the duration of any mechanical excavation on District property. Excavations within two (2) feet of pipelines shall be made by hand. Entry permits are required for pothole work.
38. All grading or excavating of the right-of-way requires USA notification and the maintenance of a current inquiry identification number.

39. Certified six-sack mix is the minimum acceptable concrete batch to be used on the pipelines right-of-way. Concrete compression strength shall be 3,000 per square inch (PSI) or better at 28 days. If samples do not reach 3,000 PSI at 28 days, the entire section of slab or encasement related to that sample must be removed and replaced at applicant's expense.
40. Each truckload of concrete to be placed on the right-of-way may be sampled by the District. No water may be added to the mix after sampling.
41. Maximum allowable slump is three inches. All concrete exceeding three inches will be rejected and cannot be used on the right-of-way.
42. No traffic will be allowed over protective slabs until 3,000 PSI is reached.
43. All work areas shall be inspected by the District for final approval. As-built drawing submittals are required for District approval.
44. No work is allowed on weekends or District-recognized holidays unless otherwise authorized in the required permit.

Letter 7

Commenter: David J. Rehnstrom, Manager of Water Distribution Planning, East Bay Municipal Utility District (EBMUD)

Date: August 4, 2026

Response 7.1

The commenter appreciates the opportunity to review and comment on the Draft Program EIR for the 2026 RTP/SCS and acknowledges the regional scope of the Plan. The comment serves as an introduction to the commenter's remarks and does not raise an issue regarding the adequacy of the environmental analysis in the EIR. No further response is required.

Response 7.2

The commenter notes that EBMUD's Mokelumne Aqueduct right-of-way traverses San Joaquin County and advises that any project proposed within or immediately adjacent to EBMUD property must comply with EBMUD's Procedure 718 governing authorized uses of pipeline rights-of-way. The comment provides information regarding project coordination and compliance requirements for future project-level activities and does not raise an issue regarding the adequacy of the environmental analysis in the EIR. No further response is required.

Response 7.3

The commenter advises that any roadway, utility, facility, or other project crossing located within the EBMUD Mokelumne Aqueduct right-of-way should be submitted to EBMUD for review to address potential impacts related to drainage, grading, fencing, construction access, and other property considerations. The commenter also provides submittal requirements and references EBMUD Procedure 718 for additional guidance and encroachment review procedures. The comment pertains to future project-level coordination and permitting requirements and does not raise an issue regarding the adequacy of the environmental analysis in the EIR. No further response is required.

Response 7.4

The commenter notes that applications for non-EBMUD uses within EBMUD rights-of-way must be accompanied by the applicable fees identified in EBMUD's current Water and Wastewater System Schedule of Rates and Charges and Fees. The comment provides information regarding future permitting and application requirements and does not raise an issue regarding the adequacy of the environmental analysis in the EIR. No further response is required.

Response 7.5

The commenter advises that contractors must obtain an encroachment permit from EBMUD's Aqueduct Section before commencing construction activities within EBMUD rights-of-way and notes that a pre-construction meeting with EBMUD is required. The comment provides information regarding future project-level permitting and coordination requirements and does not raise an issue regarding the adequacy of the environmental analysis in the EIR. No further response is required.

Response 7.6

The commenter advises that retaining walls, fences, and associated footings constructed along EBMUD property boundaries must be located entirely outside EBMUD property. The commenter further recommends that individual project sponsors coordinate with EBMUD's Survey Section to identify, locate, and mark property lines prior to project implementation. The comment pertains to future project-level

design and coordination requirements and does not raise an issue regarding the adequacy of the environmental analysis in the EIR. No further response is required.

Response 7.7

The commenter notes that, on Page 4.3-36 under Impact BIO-3, the EIR identifies impacts to wildlife movement, including fish migration, as significant and unavoidable; however, the post-mitigation discussion primarily addresses terrestrial wildlife. The commenter requests clarification regarding potential impacts to fish migration and whether additional fish-specific mitigation measures should be considered. Future project-specific environmental review would evaluate potential impacts to fish passage and migration and identify additional avoidance, minimization, or mitigation measures, as appropriate, based on project-specific conditions. However, to more accurately reflect the mitigation measures consideration of both terrestrial wildlife movement and fish migration, the "Significance After Mitigation" discussion has been revised in Section 4.3.3, b, Page 4.3-40 of Section 4.3, *Biological Resources*:

Significance After Mitigation

Compliance with the above mitigation measures would reduce impacts to wildlife movement by requiring projects to be designed in a way that maintains connectivity. However, it cannot be guaranteed that movement of terrestrial and aquatic species will not be impeded at the regional scale due to the large scale of the proposed 2026 RTP/SCS. No additional feasible mitigation measures are available to reduce impacts on wildlife movement. Thus, this impact would remain significant and unavoidable.

No further response is required.

Response 7.8

The commenter notes an inconsistency in the identified dry season work windows within the EIR between the Executive Summary and the Biological Resources section. The commenter requests that these references be reconciled to ensure consistency throughout the document. The dry season dates identified in both the Executive Summary (Page ES-14) and Section 4.3, *Biological Resources* (Page 4.3-36), have been revised to ensure consistency throughout the EIR. To note, the timing and duration of the dry season may vary due to annual climatic conditions, global climate change, and cyclical climate patterns such as El Niño and La Niña events, among other factors.

Executive Summary [page ES-14]

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:

- [..]
- [..]
- Project activities within the jurisdictional areas should occur during the dry season (typically between ~~June 1~~ April 1 and November 1) in any given year, or as otherwise directed by the regulatory agencies.

Biological Resources [page 4.3-36]

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:

- [..]
- [..]

- Project activities within the jurisdictional areas should occur during the dry season (typically between ~~June 1~~ April 1 and November 1) in any given year, or as otherwise directed by the regulatory agencies.
- Actual in-water work windows will be determined at the project level in consultation with applicable regulatory agencies, based on affected species and life stages, site conditions, and agency requirements.

No further response is required.

Response 7.9

The commenter recommends clarifying that actual in-water work windows will be determined during project-level review in coordination with the applicable regulatory agencies and based on species presence, life stages, site-specific conditions, and regulatory requirements. The comment seeks clarification regarding future implementation of biological resource protection measures. This clarification has been added to Mitigation Measure BIO-2(f) as shown above in Response 7.8 to address this comment. This clarification does not raise an issue regarding the adequacy of the environmental analysis in the EIR. No further response is required.

Response 7.10

The commenter provides contact information for a representative available to answer questions regarding the submitted comments. The comment is administrative and does not raise an issue regarding the adequacy of the environmental analysis in the EIR. No further response is required.

Response 7.11

The commenter provides a Map of EBMUD Aqueducts that are referenced in their letter. This reference was reviewed within the letter and 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.

Response 7.12

The commenter provides Procedure 718-Authorized Uses of Pipeline Rights-of-Way that is referenced in their letter. This reference was reviewed within the letter and 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.

Letter 8

August 5, 2026

Edith Verdin
San Joaquin Council of Governments
555 E. Weber Ave
Stockton, CA 95202

Project: Draft Program Environmental Impact Report for 2026 Regional Transportation Plan and Sustainable Communities Strategy

District CEQA Reference No: 20260739

Dear Ms. Verdin:

The San Joaquin Valley Air Pollution Control District (District) has reviewed the Draft Program Environmental Impact Report (DPEIR) from the San Joaquin Council of Governments (SJCOG) for the 2026 Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS) Project. Per the DPEIR, the project consists of updating SJCOG's transportation plan for the region's transportation system to ensure the plan adequately addresses future transportation needs (Project). The Project is located within San Joaquin County including incorporated cities (Escalon, Lathrop, Lodi, Manteca, Mountain House, Stockton, Tracy, Ripon), all in California.

8.1

The District offers the following comments at this time regarding the Project:

1) Land Use Planning/Project Sitting

The RTP/SCS is used to guide development in order to plan the construction of regional transportation projects that require partnership with its member agencies. Nearly all development projects within the San Joaquin Valley Air Basin, from RTP/SCS to individual projects have the potential to generate air pollutants, making it more difficult to attain state and federal ambient air quality standards. Land use decisions are critical to improving air quality within the San Joaquin Valley Air Basin because land use patterns greatly influence transportation needs, and motor vehicle emissions are the largest source of air pollution in the Valley. Land use decisions and project design elements such as preventing urban sprawl, encouraging mix-use development, and project design elements that reduce vehicle miles traveled (VMT) have proven to be beneficial for air quality. The District recommends that future development incorporate strategies that reduce VMTs and require the cleanest

8.2

Samir Sheikh
Executive Director/Air Pollution Control Officer

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2-57

available heavy-duty trucks, vehicles, and off-road equipment, including zero and near-zero technologies. VMTs can be reduced through encouragement of mix-use development, walkable communities, etc. Additional design element options can be found at: <https://ww2.valleyair.org/media/ob0pweru/clean-air-measures.pdf>

In addition, the District recommends that future development incorporate strategies that will advance implementation of the best practices listed in Tables 5 and 6 of California Air Resource Board's (CARB's) Freight Handbook Concept Paper, to the extent feasible. This document compiles best practices designed to address air pollution impacts as "practices" which may apply to the siting, design, construction, and operation of freight facilities to minimize health impacts on nearby communities. The concept paper is available at:
https://ww2.arb.ca.gov/sites/default/files/2020-03/2019.12.12%20-%20Concept%20Paper%20for%20the%20Freight%20Handbook_1.pdf

8.3

2) **Project Related Emissions**

The District recommends that the DPEIR stipulate that future development projects within the RTP/SCS identify and characterize project construction and operational air emissions. The District recommends the air emissions be compared to the District significance thresholds as identified in the District's Guidance for Assessing and Mitigating Air Quality Impacts: <https://ww2.valleyair.org/media/g4nl3p0g/gamaqi.pdf>. The District recommends that future projects be mitigated to the extent feasible, and that future projects with air emissions above the aforementioned thresholds be mitigated to below these thresholds.

The District understands that the RTP/SCS is a program-level project where future individual project-specific data may not be available at this time. As such, future development projects within the RTP/SCS should include a discussion of policies, which when implemented, will require assessment and characterization of project-level emissions, and subsequently require mitigation of air quality impacts to the extent feasible at the individual project-specific level. Environmental reviews of potential impacts on air quality should incorporate the following items:

2a) **Operational Emissions**

Future Development projects operational (ongoing) air emissions from mobile sources and stationary sources should be analyzed separately. For reference, the District's significance thresholds are identified in the District's Guidance for Assessing and Mitigating Air Quality Impacts: <https://ww2.valleyair.org/media/g4nl3p0g/gamaqi.pdf>.

Recommended Mitigation Measure: At a minimum, project related impacts on air quality should be reduced to levels below the District's significance thresholds through incorporation of design elements such as the use of cleaner

Heavy Heavy-Duty (HHD) trucks and vehicles, measures that reduce Vehicle Miles Traveled (VMTs), and measures that increase energy efficiency. More information on transportation mitigation measures can be found at:

<https://ww2.valleyair.org/media/ob0pweru/clean-air-measures.pdf>

2b) Recommended Model for Quantifying Air Emissions

Future development project-related criteria pollutant emissions from construction and operational sources should be identified and quantified. Emissions analysis should be performed using the California Emission Estimator Model (CalEEMod), which uses the most recent CARB-approved version of relevant emissions models and emission factors. CalEEMod is available to the public and can be downloaded from the CalEEMod website at: www.caleemod.com.

8.3 cont.

3) Health Risk Screening/Assessment

Mitigation Measure AQ-5 in the DPEIR, states that for projects that do not meet health risk assessment (HRA) screening, a qualified air quality consultant is to be retained to prepare a HRA in accordance with CARB and OEHHA requirements to determine the exposure for sensitive receptors (residences, businesses, hospitals, day-care facilities, health care facilities, etc.) in the area and mitigate any potentially significant risk to help limit exposure of sensitive receptors to emissions.

To determine potential health impacts on surrounding receptors (residences, businesses, hospitals, day-care facilities, health care facilities, etc.) a Prioritization and/or a Health Risk Assessment (HRA) should be performed for future development projects that may be approved under implementation of the Project. These health risk determinations should quantify and characterize potential Toxic Air Contaminants (TACs) identified by the Office of Environmental Health Hazard Assessment/California Air Resources Board (OEHHA/CARB) that pose a present or potential hazard to human health.

8.4

Health risk analyses should include all potential air emissions from the project, which include emissions from construction of the project, including multi-year construction, as well as ongoing operational activities of the project. Note, two common sources of TACs can be attributed to diesel exhaust emitted from heavy-duty off-road earth moving equipment during construction, and from ongoing operation of heavy-duty on-road trucks.

Prioritization (Screening Health Risk Assessment):

A "Prioritization" is the recommended method for a conservative screening-level health risk assessment. The Prioritization should be performed using the California Air Pollution Control Officers Association's (CAPCOA) methodology. Please contact the District for assistance with performing a Prioritization analysis.

The District recommends that a more refined analysis, in the form of an HRA, be performed for any project resulting in a Prioritization score of 10 or greater. This is because the prioritization results are a conservative health risk representation, while the detailed HRA provides a more accurate health risk evaluation.

Health Risk Assessment:

Prior to performing an HRA, it is strongly recommended that land use agencies/ project proponents develop and submit for District review a health risk modeling protocol that outlines the sources and methodologies that will be used to perform the HRA.

A development project would be considered to have a potentially significant health risk if the HRA demonstrates that the health impacts would exceed the District's established risk thresholds, which can be found here:

<https://ww2.valleyair.org/permitting/ceqa/>.

A project with a significant health risk would trigger all feasible mitigation measures. The District strongly recommends that development projects that result in a significant health risk not be approved by the land use agency.

The District is available to review HRA protocols and analyses. For HRA submittals please provide the following information electronically to the District for review:

- HRA (AERMOD) modeling files
- HARP2 files
- Summary of emissions source locations, emissions rates, and emission factor calculations and methodologies.

For assistance, please contact the District's Technical Services Department by:

- E-Mailing inquiries to: hramodeler@valleyair.org
- Calling (559) 230-5900

Recommended Measure: Development projects resulting in TAC emissions should be located an adequate distance from residential areas and other sensitive receptors to prevent the creation of a significant health risk in accordance to CARB's Air Quality and Land Use Handbook: A Community Health Perspective located at <https://ww2.arb.ca.gov/our-work/programs/resource-center/strategy-development/land-use-resources>.

8.4 cont.

4) Ambient Air Quality Analysis

An Ambient Air Quality Analysis (AAQA) uses air dispersion modeling to determine if emissions increases from a project will cause or contribute to a violation of State or National Ambient Air Quality Standards. The District recommends an AAQA be performed for any future development projects that may be approved under implementation of the Project with emissions that exceed 100 pounds per day of any pollutant.

An AAQA uses air dispersion modeling to determine if emission increase from a project will cause or contribute to a violation of State or National Ambient Air Quality Standards. An acceptable analysis would include emissions from both project-specific permitted and non-permitted equipment and activities. The District recommends consultation with District staff to determine the appropriate model and input data to use in the analysis.

Specific information for assessing significance, including screening tools and modeling guidance, is available online at the District's website:
<https://ww2.valleyair.org/permitting/ceqa/>.

8.5

5) Recommended Emission Reduction Strategies to Reduce Emissions from Future Projects within the RTP/SCS

5a) Voluntary Emission Reduction Agreement

In the DPEIR, it states "Under CEQA, Participation in a District Voluntary Emission Reduction Agreement (VERA) is not required but may be used, at the discretion of the lead agency, to reduce a project's contribution to significant or cumulatively considerable air quality impacts." For future development projects that may be approved under implementation of the Project, when determined to exceed the District's CEQA significance thresholds, the District recommends a feasibility discussion on implementing a VERA be included as a mitigation measure.

A VERA is a mitigation measure by which the project proponent provides pound-for-pound mitigation of emissions increases through a process that develops, funds, and implements emission reduction projects, with the District serving a role of administrator of the emissions reduction projects and verifier of the successful mitigation effort. To implement a VERA, the project proponent and the District enter into a contractual agreement in which the project proponent agrees to mitigate project specific emissions by providing funds for the District's incentives programs. The funds are disbursed by the District in the form of grants for projects that achieve emission reductions. Thus, project-related impacts on air quality can be mitigated. Types of emission reduction projects that have been funded in the past include electrification of stationary

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internal combustion engines (such as agricultural irrigation pumps), replacing old heavy-duty trucks with new, cleaner, more efficient heavy-duty trucks, and replacement of agricultural equipment with the latest generation technologies.

In implementing a VERA, the District verifies the actual emission reductions that have been achieved as a result of completed grant contracts, monitors the emission reduction projects, and ensures the enforceability of achieved reductions. After the project is mitigated, the District certifies to the Lead Agency that the mitigation is completed, providing the Lead Agency with an enforceable mitigation measure demonstrating that project-related emissions have been mitigated. To assist the Lead Agency and project proponent in ensuring that the environmental document is compliant with CEQA, the District recommends the environmental document includes an assessment of the feasibility of implementing a VERA.

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cont.

5b) Vegetative Barriers and Urban Greening

For future development projects within the Project area, and at strategic locations throughout the Project area in general, the District suggests incorporating vegetative barriers and urban greening as a measure to further reduce air pollution exposure on sensitive receptors (e.g., residences, schools, healthcare facilities).

While various emission control techniques and programs exist to reduce air quality emissions from mobile and stationary sources, vegetative barriers have been shown to be an additional measure to potentially reduce a population's exposure to air pollution through the interception of airborne particles and the uptake of gaseous pollutants. Examples of vegetative barriers include, but are not limited to the following: trees, bushes, shrubs, or a mix of these. Generally, a higher and thicker vegetative barrier with full coverage will result in greater reductions in downwind pollutant concentrations. In the same manner, urban greening is also a way to help improve air quality and public health in addition to enhancing the overall beautification of a community with drought tolerant, low-maintenance greenery.

8.7

5c) Locomotives, and Railcar Movers/Switchers

Per Mitigation Measure MM AQ-3(a), to help reduce regional PM10 emissions, SJCOG, in partnership with implementing agencies shall "Support the use of existing air quality and transportation funds indented to retrofit and replace trucks and locomotives to reduce particulate matter". Replacing older locomotives is important to reduce the public's exposure to diesel emissions, including PM2.5 in the form of diesel particulate and NOx. These pollutants negatively impact human health, especially for sensitive populations such as

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children and the elderly. New, clean-technology locomotives generate significantly lower emissions than older, uncontrolled diesel locomotives.

The District offers the following incentive program for locomotive fleets interested in transitioning to newer, clean technology:

- Heavy-Duty Program – <https://ww2.valleyair.org/grants/locomotive-program/>
- Locomotive replacements, including switcher locomotives and railcar movers can be funded as an eligible project category under the District's utilizing funding provided to support AB 617. These projects are administered according to the Carl Moyer Program guidelines.

8.8 cont.

5d) **District's Bikeway Incentive Program**

Incorporating design elements (e.g., installing bikeways) that enhance walkability and connectivity can result in an overall reduction of vehicles miles traveled (VMT) and improve air quality within the area. Since future development projects approved under implementation of the Project may install bikeways, they may be eligible for funding through the District's Bikeway Incentive Program. The Bikeway Incentive Program provides funding for eligible Class I (Bicycle Path Construction), Class II (Bicycle Lane Striping), or Class III (Bicycle Route) projects. These incentives are designed to support the construction of new bikeway projects to promote clean air through the development of a widespread, interconnected network of bike paths, lanes, or routes and improving the general safety conditions for commuter bicyclists. Only municipalities, government agencies, or public educational institutions are eligible to apply. More information on the grant program can be found at: <https://ww2.valleyair.org/grants/bike-paths/>

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Guidelines and Project Eligibility for the grant program can be found at: <https://ww2.valleyair.org/media/drpiuw1/bikeway-program-guidelines-62515.pdf>

6) **District Rules and Regulations**

The District issues permits for many types of air pollution sources, and regulates some activities that do not require permits. A project subject to District rules and regulations would reduce its impacts on air quality through compliance with the District's regulatory framework. In general, a regulation is a collection of individual rules, each of which deals with a specific topic. As an example, Regulation II (Permits) includes District Rule 2010 (Permits Required), Rule 2201 (New and Modified Stationary Source Review), Rule 2520 (Federally Mandated Operating Permits), and several other rules pertaining to District permitting requirements and processes.

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The list of rules below is neither exhaustive nor exclusive. Current District rules can be found online at: <https://ww2.valleyair.org/rules-and-planning/current-district-rules-and-regulations>. To identify other District rules or regulations that apply to future projects, or to obtain information about District permit requirements, the project proponents are strongly encouraged to contact the District's Small Business Assistance (SBA) Office at (209) 557-6446.

6a) District Rules 2010 and 2201 - Air Quality Permitting for Stationary Sources

Stationary Source emissions include any building, structure, facility, or installation which emits or may emit any affected pollutant directly or as a fugitive emission. District Rule 2010 (Permits Required) requires operators of emission sources to obtain an Authority to Construct (ATC) and Permit to Operate (PTO) from the District. District Rule 2201 (New and Modified Stationary Source Review) requires that new and modified stationary sources of emissions mitigate their emissions using Best Available Control Technology (BACT).

Future development projects may be subject to District Rule 2010 (Permits Required) and Rule 2201 (New and Modified Stationary Source Review) and may require District permits. Prior to construction, project proponents shall obtain an ATC permit from the District for equipment/activities subject to District permitting requirements. For further information or assistance, project proponents may contact the District's SBA Office at (209) 557-6446.

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cont.**

6b) District Rule 9510 - Indirect Source Review (ISR)

The purpose of District Rule 9510 is to reduce the growth in both NO_x and PM emissions associated with development and transportation projects from mobile and area sources; specifically, the emissions associated with the construction and subsequent operation of development projects. The ISR Rule requires developers to mitigate their NO_x and PM emissions by incorporating clean air design elements into their projects. Should the proposed development project clean air design elements be insufficient to meet the required emission reductions, developers must pay a fee that ultimately funds incentive projects to achieve off-site emissions reductions.

Accordingly, future development projects may be subject to District Rule 9510 if upon full buildout, the project would equal or exceed any of the following applicability thresholds, depending on the type of development and public agency approval mechanism:

Table 1: ISR Applicability Thresholds

Development Type	Discretionary Approval Threshold	Ministerial Approval / Allowed Use / By Right Thresholds
Residential	50 dwelling units	250 dwelling units
Commercial	2,000 square feet	10,000 square feet
Light Industrial	25,000 square feet	125,000 square feet
Heavy Industrial	100,000 square feet	500,000 square feet
Medical Office	20,000 square feet	100,000 square feet
General Office	39,000 square feet	195,000 square feet
Educational Office	9,000 square feet	45,000 square feet
Government	10,00 square feet	50,000 square feet
Recreational	20,000 square feet	100,000 square feet
Other	9,000 square feet	45,000 square feet

District Rule 9510 also applies to any transportation or transit development projects where construction exhaust emissions equal or exceed two tons of NO_x or two tons of PM.

In the case the future development project is subject to District Rule 9510, per Section 5.0 of the rule, an Air Impact Assessment (AIA) application is required to be submitted no later than applying for project-level approval from a public agency so that proper mitigation and clean air design under ISR can be incorporated into the public agency's analysis.

Information about how to comply with District Rule 9510 can be found online at: <https://www2.valleyair.org/permitting/indirect-source-review-rule-overview>

The AIA application form can be found online at: <https://www2.valleyair.org/permitting/indirect-source-review-rule-overview/forms-and-applications/>

District staff is available to provide assistance with determining if the Project OR future development projects will be subject to Rule 9510, and can be reached by phone at (559) 230-5900 or by email at ISR@valleyair.org.

6c) District Rule 9410 (Employer Based Trip Reduction)

Future development projects may be subject to District Rule 9410 (Employer Based Trip Reduction) if the project would result in employment of 100 or more "eligible" employees. District Rule 9410 requires employers with 100 or more "eligible" employees at a worksite to establish an Employer Trip Reduction Implementation Plan (eTRIP) that encourages employees to reduce single-occupancy vehicle trips, thus reducing pollutant emissions associated with work

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cont.**

commutes. Under an eTRIP plan, employers have the flexibility to select the options that work best for their worksites and their employees.

Information about District Rule 9410 can be found online at:
<https://ww2.valleyair.org/compliance/rule-9410-employer-based-trip-reduction/>.

For additional information, you can contact the District by phone at 559-230-6000 or by e-mail at etrip@valleyair.org

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cont.**

6d) Other District Rules and Regulations

Future development projects may also be subject to the following District rules: Rule 4102 (Nuisance) and Rule 4641 (Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations).

7) District Comment Letter

The District recommends that a copy of the District's comments be provided to the Project proponent.

If you have any questions or require further information, please contact Ryan Grossman by e-mail at ryan.grossman@valleyair.org or by phone at (559) 230-6569.

8.11

Sincerely,

Mark Montelongo
Director of Policy and Government Affairs



Daniel Martinez
Program Manager

Letter 8

Commenter: Mark Montelongo, Director of Policy and Government Affairs, San Joaquin Valley Air Pollution Control District (SJVAPCD)

Date: August 5, 2026

Response 8.1

The commenter provides an overview of the proposed 2026 RTP/SCS and acknowledges that the Project involves updating SJCOG's regional transportation plan to address future transportation needs throughout the San Joaquin County and its incorporated and unincorporated communities. This comment is introductory and summarizes the Project description. The comment does not identify any specific significant environmental impacts or deficiencies in the environmental analysis presented in the EIR. No further response is necessary.

Response 8.2

The commenter recommends land use decisions to reduce VMT and the use of the cleanest available heavy-duty vehicles and equipment, including zero- and near-zero-emission technologies, and encourages consideration of applicable air quality best practices identified by the SJVAPCD and the California Air Resources Board (CARB) for future development and freight-related projects. The RTP\SCS includes policies and has selected a land use scenario to reduce sprawl, encourage mixed use, and reduce VMT in the region. These comments provide general recommendations regarding land use planning, project design, and air quality considerations for future project implementation. The comments do not identify any specific significant environmental impacts or deficiencies in the environmental analysis presented in the EIR. The recommendations have been noted for consideration during future project-level planning and environmental review. No further response is necessary.

Response 8.3

The commenter recommends implementing the best practices listed in tables 5 and 6 of the California Air Resource Board's (CARB's) Freight Handbook Concept Paper. These represent potential practices to minimize community health impacts and not specific mitigation to reduce impacts. The commentator also recommends that future development projects implementing the RTP/SCS identify, quantify, and evaluate construction and operational air emissions and compare those emissions to applicable SJVAPCD significance thresholds. The commenter further recommends that future projects incorporate feasible mitigation measures to reduce air quality impacts, including the use of cleaner vehicle and equipment technologies, strategies to reduce VMT, and energy-efficient design features. The commenter also recommends the use of CalEEMod or other applicable models to quantify project-level emissions during future environmental review. These comments pertain to the analysis and mitigation of air quality impacts at the project level and provide recommendations for future environmental review of individual projects implementing the 2026 RTP/SCS. It is noted that the EIR acknowledges its programmatic nature and states that "a precise, project-level analysis of the specific impacts associated with individual transportation and land use projects is not possible at this time", in Section 4.2, Air Quality, Page 4.2-24 through Page 4.2-25. The EIR further explains that the quantity of emissions associated with individual transportation improvement and development projects would be determined during future project review and that project-specific CEQA documents would evaluate emissions in relation to applicable SJVAPCD significance thresholds in Page 4.2-26. Furthermore, the EIR provides that project-specific environmental documents may adjust mitigation measures as necessary to address site-specific conditions on Pages 4.2-26 and 4.2-31. The comments do not identify any specific deficiencies in the air quality analysis presented in the EIR. No further response is necessary.

Response 8.4

The commenter recommends that future projects assess potential impacts to sensitive receptors, implement feasible mitigation measures where significant health risks are identified, and consider appropriate separation distances between emission sources and sensitive land uses. These comments pertain to the analysis and mitigation of potential health risks at the project level and provide recommendations for future environmental review of individual projects implementing the 2026 RTP/SCS. As detailed in Response 8.3, it is noted that future discretionary projects implementing the 2026 RTP/SCS would undergo project-specific environmental review, including evaluation of air quality impacts and applicable mitigation measures, as appropriate. No further response is necessary.

Response 8.5

The commenter recommends that future development projects implementing the RTP/SCS evaluate potential impacts on ambient air quality through an Ambient Air Quality Analysis (AAQA) where project emissions exceed applicable screening criteria. The commenter further recommends that future project-level analyses consider emissions from both permitted and non-permitted sources and coordinate with the SJVAPCD regarding appropriate analytical methods and modeling assumptions. These comments pertain to the assessment of air quality impacts during future project-level environmental review and provide recommendations for evaluating consistency with State and federal ambient air quality standards. As detailed in Response 8.3, it is noted that future discretionary projects implementing the 2026 RTP/SCS would undergo project-specific environmental review, including evaluation of air quality impacts and applicable mitigation measures, as appropriate. The comments do not identify any deficiencies in the air quality analysis presented in the EIR. No further response is necessary.

Response 8.6

The commenter recommends that future development projects implementing the RTP/SCS consider the feasibility of participating in the SJVAPCD's Voluntary Emission Reduction Agreement (VERA) program when project emissions exceed applicable District significance thresholds. The commenter notes that a VERA may be used as a mitigation mechanism to offset project-related air emissions through implementation of emission reduction projects administered by the District. These comments provide recommendations regarding potential mitigation options for future project-level air quality impacts and do not identify any deficiencies in the air quality analysis presented in the EIR. As detailed in Response 8.3, it is noted that future discretionary projects implementing the 2026 RTP/SCS would undergo project-specific environmental review, including evaluation of air quality impacts and applicable mitigation measures, as appropriate, which could include participating in VERA. The comments do not identify any deficiencies in the air quality analysis presented in the EIR. No further response is necessary.

Response 8.7

The commenter recommends incorporating vegetative barriers and urban greening strategies into future development projects to help reduce air pollution exposure for sensitive receptors, such as residences, schools, and healthcare facilities. The commenter notes that features such as trees, shrubs, and other landscaping can provide additional air quality and public health benefits by helping to reduce pollutant concentrations, while also enhancing community aesthetics. This recommendation is already included in Mitigation Measure AQ-3(b) found on page 4.3-34, copied below:

- 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.

These recommendations are already included in the EIR. No further response is necessary.

Response 8.8

The commenter provides information regarding available incentive and grant funding programs that may assist locomotive fleets in transitioning to lower-emission equipment. These comments provide recommendations and information regarding implementation of Mitigation Measure AQ-3(a) and available funding opportunities. The comments do not identify any specific significant environmental impacts or deficiencies in the environmental analysis presented in the EIR. The information has been noted for consideration during future project implementation. No further response is necessary.

Response 8.9

The commenter recommends incorporating bikeway and active transportation improvements into future development projects to enhance walkability, connectivity, and reductions in VMT, which can contribute to improved regional air quality. The commenter also provides information regarding the SJVAPCD's Bikeway Incentive Program. These policies are included in the RTP/SCS with the RTP funding projects to enhance walkability and the SCS land use scenario selected to reduce VMT and encourage walkability and use of active transportation. These comments provide recommendations and information regarding active transportation planning and potential funding sources for future projects. The comments do not identify any specific significant environmental impacts or deficiencies in the environmental analysis presented in the EIR. The information has been noted for consideration during future project planning and implementation. No further response is necessary.

Response 8.10

The commenter provides information regarding SJVAPCD permitting requirements, regulations, and programs that may apply to future development projects implementing the RTP/SCS. The commenter notes that future projects may be subject to District permitting requirements, including District Rules 2010 and 2201, as well as other applicable regulations such as Rule 9510 (Indirect Source Review) and Rule 9410 (Employer Based Trip Reduction). The commenter also provides information regarding applicable thresholds, permitting processes, air quality mitigation requirements, and available District resources and assistance for project proponents. These comments are informational and are regarding future project-level compliance with existing air quality regulations and permitting requirements. The comments do not identify any specific significant environmental impacts or deficiencies in the environmental analysis presented in the EIR. It is noted that individual projects implementing the RTP/SCS would be required to comply with all applicable federal, State, and local regulations, as part of project-specific environmental review and permitting. No further response is necessary.

Response 8.11

The commenter requests that SJVAPCD's comment letter be provided to the Project proponent and provides contact information for follow-up questions regarding the comments. The letter was sent to SJCOG, the project proponent. This comment is administrative and does not identify any specific significant environmental impacts or deficiencies in the environmental analysis presented in the EIR. The comment has been noted. No further response is necessary.

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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 ~~strikethrough~~, 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.) Edits to TRA-2 are correcting typographical errors. The added analysis on the Delta Plan policy DP-P1 further clarifies the RTP\SCS’ consistency with that policy, and the revisions to BIO-3 determination is to make explicit that the analysis included aquatic species.

3.1 Revisions to the Draft EIR

Executive Summary

Page ES-7:

AES-2 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:

- ~~Sitting~~ Siting or designing projects to minimize their intrusion into important viewsheds;

Page ES-8:

“AQ-3(a) PM10 Emissions Reduction. To help reduce regional PM10 emissions, ~~TCAG~~ SJCOG, in partnership with SJVAPCD and implementing agencies, shall...”

Page ES-10:

“Impact BIO-1: ~~Significant and unavoidable~~ Less than significant”

Page ES-11:

- All projects occurring within/adjacent to aquatic habitats (including riparian habitats and wetlands) shall be completed between April 1 and ~~October 3~~ November 1, to avoid impacts to sensitive aquatic species.

Page ES-14:

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:

- [...]
- [...]
- Project activities within the jurisdictional areas should occur during the dry season (typically between ~~June 1~~ April 1 and November 1) in any given year, or as otherwise directed by the regulatory agencies.
- Actual in-water work windows will be determined at the project level in consultation with applicable regulatory agencies, based on affected species and life stages, site conditions, and agency requirements.
- [...]

Page ES-14:

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.
- ~~Daily~~ eConstruction work schedules shall be limited to daylight hours only, to the maximum extent practicable.
- 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.

Page ES-19:

“Impact HAZ-3: The 2026 RTP/SCS includes land use patterns and transportation projects that could occur on previously unknown hazardous material sites or sites on the list compiled by Government Code Section 65962.5, and therefore create a significant hazard to the public or environment. This impact would be significant ~~but mitigable and unavoidable. Less than significant~~”

Page ES-22:

“Impact TRA-2: The proposed 2026 RTP/SCS would result in an overall increase in regional VMT above baseline (2023~~5~~) conditions, but would result in an ~~increase~~ decrease in VMT per capita above baseline (2023~~5~~) conditions. Regional VMT and VMT per capita impacts from implementation of the proposed 2026 RTP/SCS would be significant and unavoidable. The induced travel impact at the regional level would be less than significant.”

“TRA-2(a) Regional VMT Reduction Programs. Implementing agencies shall require...”

Page ES-23:

“Impact TRA-4: Transportation and land use projects implemented under the proposed ~~2022~~ 2026 RTP/SCS would not result in inadequate emergency vehicle access. This impact would be less than significant.”

Page ES-24:

“Impact WF-2: *Proposed transportation improvements and land use projects envisioned by the 2026 ~~MTP~~ RTP/SCS would be located in or near SRAs This would exacerbated wildfire risks that could lead to increased pollution concentrations, increase wildfire risk associated with the construction or maintenance of infrastructure such as roads, and increase the likelihood of post-fire landslides and flooding. Existing regulations and proposed mitigation measures would reduce this risk and Impacts would be less than significant with mitigation.*”

Section 1, Introduction

Page 10:

“While no responsible or trustee agencies are responsible for approvals associated with the adoption of the 2026 RTP/SCS, implementation of projects identified in the 2026 RTP/SCS will require permits and approvals from lead, responsible, and trustee agencies, which may include the following:

- Central Valley Flood Protection Board”

Section 3, Environmental Setting

Page 3-1:

“San Joaquin County is considered one of the fastest growing regions in the Central Valley, with the population expected to reach about ~~878,093~~ 950,019 people by 2049 (Damkowitch & Molakatalla 2026).”

Section 4.2, Air Quality

Page 4.2-24:

“The significance threshold for long-term public health risk is set at 20 excess cancer cases in a million for cancer risk. For non-cancer risk (i.e., chronic or acute risk), the significance threshold is set at a hazard index of greater than 1.0. The health impacts of TACs are discussed separately under Impact AQ-54.”

Page 4.2-29:

Table 4.2-1 Regional Air Pollutant Emissions – SJCOG Region

Scenario ²	VMT	ROG (tons/day)	NO _x (tons/day)	PM ₁₀ (tons/day) ¹	PM _{2.5} (tons/day) ¹
2025 Baseline	18,854,706	3.242	6.304	0.600	0.240
2049 No Project	<u>21,404,305</u> ~~21,444,530~~	<u>1.859</u> ~~1.863~~	<u>5.761</u> ~~5.772~~	<u>0.713</u> ~~0.714~~	<u>0.266</u> ~~0.267~~
2049 with Proposed 2026 RTP/SCS	<u>22,069,148</u> ~~21,418,525~~	<u>1.916</u> ~~1.859~~	<u>5.939</u> ~~5.763~~	<u>0.732</u> ~~0.710~~	<u>0.274</u> ~~0.266~~
Net Change from 2025 Baseline	<u>3,214,442</u> ~~2,563,819~~	<u>(1.327)</u> ~~(1.383)~~	<u>(0.365)</u> ~~(0.540)~~	<u>0.132</u> ~~0.110~~	<u>0.034</u> ~~0.025~~
Net Change from 2049 No Project	<u>664,843</u> ~~(26,004)~~	<u>0.056</u> ~~(0.004)~~	<u>0.18</u> ~~(0.01)~~	<u>0.019</u> ~~(0.003)~~	<u>0.007</u> ~~(0.001)~~

Page 4.2-33:

Table 4.2-2 Fugitive Dust Particulate Matter Comparison

Scenario	PM ₁₀ Emissions (tons/day)	PM _{2.5} Emissions (tons/day)
2025 Baseline	0.515	0.160
2049 No Project	<u>0.614</u> ~~0.615~~	<u>0.191</u> ~~0.191~~
2049 with Proposed 2026 RTP/SCS	<u>0.631</u> ~~0.612~~	<u>0.196</u> ~~0.190~~
Net Change from 2025 Baseline	<u>0.116</u> ~~0.097~~	<u>0.036</u> ~~0.030~~
Percent Change from 2025 Baseline	<u>22%</u> ~~19%~~	<u>22%</u> ~~19%~~

Source: Appendix B

Note: The fugitive dust values presented here differ from those used in federal conformity analysis due to methodological differences. Fugitive dust associated with on-road vehicle activity is conservatively represented using EMFAC tire wear and brake wear emissions as a proxy.

Page 4.2-35:

To assess the impact of the proposed 2026 RTP/SCS on diesel emissions on regional roadways, an analysis of on-road mobile source diesel PM_{2.5} and PM₁₀ emissions (primary pollutants) and diesel NO_x (as a proxy for secondary PM₁₀) is shown in Table 4.2-8. This table compares baseline (2025) conditions and future 2049 “No Project” conditions with 2049 conditions with implementation of the proposed 2026 RTP/SCS. Projected emissions for 2049 with implementation of the proposed 2026 RTP/SCS would result in reductions of diesel SO_x, diesel PM_{2.5}, and diesel PM₁₀ emissions compared to the 2025 baseline. Emissions for diesel SO_x, NO_x and CO would increase from the baseline (2025) scenario for both the 2049 “No Project” and 2049 with proposed 2026 RTP/SCS scenario; however, on-road diesel emissions 2049 with implementation of the 2026 RTP/SCS would decrease compared to the 2049 “No Project” scenario.

Table 4.2-3 On-Road Mobile Source Diesel Toxics Comparison

Scenario	Diesel PM _{2.5} (tons/day)	Diesel PM ₁₀ (tons/day)	Diesel NO _x (tons/day)	Diesel SO _x (tons/day)	Diesel CO (tons/day)
2025 Baseline	0.054	0.056	4.34	0.02	1.20
2049 No Project	<u>0.046</u>	<u>0.048</u>	<u>4.85</u>	<u>0.02</u>	<u>1.31</u>
	~~0.046~~	~~0.048~~	~~4.86~~	~~0.02~~	~~1.31~~
2049 with Proposed 2026 RTP/SCS	<u>0.023</u>	<u>0.047</u>	<u>5.00</u>	<u>0.0248</u>	<u>1.35</u>
	~~0.046~~	~~0.048~~	~~4.86~~	~~0.02~~	~~1.31~~
Net Change from 2025 Baseline	<u>(0.006)</u>	<u>(0.006)</u>	<u>0.668</u>	<u>0.0004</u>	<u>0.148</u>
	~~(0.007)~~	~~(0.008)~~	~~0.521~~	~~(0.0004)~~	~~0.109~~
Percent Change from 2025 Baseline	<u>(11%)</u>	<u>(11%)</u>	<u>15%</u>	<u>2%</u>	<u>12%</u>
	~~(14%)~~	~~(14%)~~	~~12%~~	~~(1%)~~	~~9%~~
Net Change from 2049 No Project to 2049 with Proposed 2026 RTP/SCS	<u>0.001</u>	<u>0.002</u>	<u>0.151</u>	<u>0.0007</u>	<u>0.040</u>
	~~(0.0001)~~	~~(0.0001)~~	~~(0.006)~~	~~(0.00003)~~	~~(0.002)~~
Percent Change from 2049 No Project to 2049 with Proposed 2026 RTP/SCS	<u>3.10%</u>	<u>3.10%</u>	<u>3.11%</u>	<u>3.10%</u>	<u>3.08%</u>
	~~(0.12%)~~	~~(0.12%)~~	~~(0.12%)~~	~~(0.12%)~~	~~(0.14%)~~

() denotes a negative number

Source: Appendix B

Page 4.2-40:

“Mitigation Measure AQ-54 would reduce impacts from TACs; however, it cannot be guaranteed that impacts resulting from the proposed 2026 RTP/SCS can be mitigated to a less-than significant level. Therefore, the impact would remain cumulatively considerable.”

Section 4.3, Biological Resources

Page 4.3-17:

The California State Wildlife Action Plan

The California State Wildlife Action Plan is a statewide, non-regulatory conservation strategy developed by the CDFW to identify and conserve Species of Greatest Conservation Need and their habitats before they become threatened or endangered. The California State Wildlife Action Plan evaluates the condition of California’s fish, wildlife, and plant resources, identifies key threats to biodiversity, and recommends conservation actions to protect and restore habitats throughout the state. The plan serves as a guide for collaborative conservation efforts and is updated every ten years to maintain eligibility for federal State Wildlife Grant funding.

Page 4.3-28:

- All projects occurring within/adjacent to aquatic habitats (including riparian habitats and wetlands) shall be completed between April 1 and ~~October 3~~November 1, to avoid impacts to sensitive aquatic species.

Page 4.3-36:

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:

- [..]
- [..]
- Project activities within the jurisdictional areas should occur during the dry season (typically between ~~June 1~~April 1 and November 1) in any given year, or as otherwise directed by the regulatory agencies.
- Actual in-water work windows will be determined at the project level in consultation with applicable regulatory agencies, based on affected species and life stages, site conditions, and agency requirements.
- [..]

Page 4.3-40:

Significance After Mitigation

Compliance with the above mitigation measures would reduce impacts to wildlife movement by requiring projects to be designed in a way that maintains connectivity. However, it cannot be guaranteed that movement of terrestrial and aquatic species will not be impeded at the regional scale due to the large scale of the proposed 2026 RTP/SCS. No additional feasible mitigation measures are available to reduce impacts on wildlife movement. Thus, this impact would remain significant and unavoidable.

Section 4.4, Cultural Resources

Page 4.4-17:

“The following section describes cultural resource impacts associated with the transportation improvements and future land use scenario in the ~~2050 MTP~~2026 RTP/SCS.”

Section 4.5, Energy

Page 4.5-15:

Table 4.5-4 Transportation Energy Use

Year	Daily VMT	Direct Energy Use (Daily MMBtu)	Per-Household Energy Use (Million Btu per year) ¹	Per-Capita Energy Use Daily (MMBtu)
2025 Baseline	18,854,706	143,173.22	213.32	0.18
Proposed 2026 RTP/SCS in 2049	<u>22,069,148</u>	<u>167,582.09</u>	<u>211.35</u>	<u>0.18</u>
	~~21,418,525~~	~~162,641.58~~	~~205.12~~	~~0.17~~
Change % (Baseline vs. 2026 RTP/SCS) ¹	<u>17.0%</u>	<u>17.0%</u>	<u>(0.92%)</u>	<u>(0.91%)</u>
	~~13.6%~~	~~13.6%~~	~~(3.8%)~~	~~(3.8%)~~

¹Per-Household Energy Use was calculated using housing assumptions generated by SJCOG

Source: SJCOG 2025, Appendix D

As shown in Table 4.5-6, per-household and per-capita direct transportation energy consumption would be reduced by 0.92 and 0.91 ~~3.8~~ percent, respectively, in comparison to baseline conditions. This per-household and per-capita reduction demonstrates that the 2026 RTP/SCS would result in a more efficient use of energy, not a wasteful, inefficient, or unnecessary consumption of energy resources during operation. The Low Carbon Fuel Standard, encouraging the use of more efficient fuels, along with the Energy Policy and Conservation Act, the Energy Independence and Security Act, and the CAFE fuel efficiency standards, among other regulations, all require increased fuel efficiency in vehicles to further increase energy efficiency, further reducing wasteful and inefficient use of energy through 2049.

Operational energy use is shown in Table 4.5-6. As shown in the table, daily VMT and total daily energy use would increase over time as the result of regional socioeconomic (population and employment) growth and the proposed 2026 RTP/SCS energy usage would increase. However, the proposed 2026 RTP/SCS would result in a 0.92 and 0.91 ~~3.8~~ percent decrease in per-household and per-capita energy usage, respectively, when compared to 2025 baseline conditions. The per-household and per-capita reductions in energy use would be partially attributed to reduced traffic congestion, more efficient road network, alternative modes of transportation, increases in vehicle fuel efficiency over time, and more efficient transit-oriented land use patterns.

Page 4.5-18:

Transportation Projects

As discussed in Impact E-1, the proposed 2026 RTP/SCS would result in a 0.92 and 0.91 ~~3.8~~ percent decrease in per-household and per-capita energy usage, respectively, in the region and would not result in energy used in an unnecessary or wasteful manner.”

Section 4.9, Greenhouse Gas Emissions and Climate Change

Page 4.9-15:

Table 4.9-5 Proposed 2026 RTP/SCS Total Daily VMT

Year	Total Daily VMT
2005 Baseline (SB 375 Baseline)	14,600,612
2025 Baseline (existing conditions)	18,854,706
2030 with Proposed 2026 RTP/SCS	19,387,932
2045 with Proposed 2026 RTP/SCS	21,068,148
2049 No Project	<u>21,404,305</u> ~~21,444,530~~
2049 with Proposed 2026 RTP/SCS	<u>22,069,148</u> ~~21,418,525~~

¹ Regional VMT only includes vehicle miles traveled within the SJCOG region.

VMT = vehicle miles traveled

Source: Appendix E

Page 4.9-19:

“Implementation of Mitigation Measures AQ-2(b) and AQ-2(c) in Section 4.23, Air Quality, would also reduce construction GHG emissions from the proposed 2026 RTP/SCS.”

Page 4.9-20:

Transportation-Related Emissions

“Table 4.9-6 compares the total transportation-related emissions from all vehicle classes for baseline (2025) conditions and with implementation of the proposed 2026 RTP/SCS. As presented in Table 4.9-6, implementation of the proposed 2026 RTP/SCS would result in a net reduction in per capita emissions of 0.61 ~~0.73~~ MT of CO₂e per person per year and a net reduction in total emissions of 47,646 ~~163,400~~ MT of CO₂e per year, compared to baseline (2025) conditions.”

Page 4.9-21:

Table 4.9-6 Proposed 2026 RTP/SCS Net Change in Transportation-Related Emissions (2025-2049)

Scenario	Total Emissions (MT of CO ₂ e/year)	Per Capita Emissions (MT of CO ₂ e/person/year)
2025 Baseline	2,928,615	3.64
2049 No Project	<u>2,794,179</u>	<u>2.94</u>
	~~2,772,918~~	~~2.92~~
2049 with Proposed 2026 RTP/SCS	<u>2,880,970</u>	<u>3.03</u>
	~~2,765,215~~	~~2.91~~
Net Change from Existing (2025)	(47,646)	(0.61)
	~~(163,400)~~	~~(0.73)~~
Net Change from Baseline	(7,703)	(0.01)
Threshold of Significance	> 0	> 0
Threshold Exceeded?	No	No

() denotes a negative number.
MT = metric tons; CO₂e = carbon dioxide equivalent
Source: Appendix E

Page 4.9-23:

Table 4.9-4 Per Capita Passenger Vehicle CO₂ Emissions Comparison

	Percent Change in Per Capita CO ₂ Emissions (lbs/day)		
	2005 Baseline (per SB 375)	2035	2049
Per Capita Passenger Vehicle Emissions ¹	<u>20.4</u>	<u>16.7</u>	<u>14.8</u>
	<u>18.5</u>	<u>15.0</u>	<u>14.2</u>
Percent Change from in Per Capita GHG Emissions from 2005		<u>-18.1</u>	<u>-27.5</u>
		<u>19.2%</u>	<u>23.2%</u>
SB 375 Target		-16%	n/a ²
SB 375 Target Met?		Yes	n/a ²

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

Source: Appendix E

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

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

As shown in Table 4.9-4, implementation of the proposed 2026 RTP/SCS in the year 2035 would result in a decrease of per capita passenger vehicle CO₂ emissions by ~~18.1~~ 19.2 percent compared to 2005 levels.

Page 4.9-26:

"Implementation of Mitigation Measure GHG-2 would also reduce GHG emission from land use projects. Implementation of Mitigation Measures AQ-3(b) in Section 4.2, *Air Quality*, and ~~T-1(a) and T-1(b)~~ TRA-2 in Section 4.14, *Transportation*, would further reduce GHG emissions from the proposed 2026 RTP/SCS."

Section 4.10, Hazards and Hazardous Materials

Page 4.10-22:

IMPACT HAZ-3 **THE PROPOSED 2026 RTP/SCS INCLUDES LAND USE PATTERNS AND TRANSPORTATION PROJECTS THAT COULD OCCUR ON PREVIOUSLY UNKNOWN HAZARDOUS MATERIAL SITES OR SITES ON THE LIST COMPILED BY GOVERNMENT CODE SECTION 65962.5, AND THEREFORE CREATE A SIGNIFICANT HAZARD TO THE PUBLIC OR ENVIRONMENT. THIS IMPACT WOULD BE SIGNIFICANT ~~BUT MITIGABLE~~ AND UNAVOIDABLE.**

Section 4.11, Hydrology and Water Quality

Page 4.11-18:

"The SWRCB and RWQCBs implement and enforce the Industrial General Permit, which may impact any industrial development under the ~~2050 MTP~~ 2026 RTP/SCS land use scenario."

Page 4.11-25:

IMPACT HYD-2 **IMPLEMENTATION OF PROPOSED TRANSPORTATION AND LAND USE PROJECTS ENVISIONED IN THE PROPOSED 2026 RTP/SCS WOULD SUBSTANTIALLY DECREASE GROUNDWATER SUPPLIES- AND INTERFERE WITH GROUNDWATER RECHARGE SUCH THAT IT MAY IMPEDE SUSTAINABLE GROUNDWATER MANAGEMENT OF THE BASINS. IMPACTS WOULD BE SIGNIFICANT AND UNAVOIDABLE.**

Page 4.11-34:

"Of the two primary GSPs in the SJCOG region, ~~the~~ ESJGA was submitted for DWR review and has been determined incomplete and must undergo further revision, while that for the TSGSA is currently in the process of undergoing DWR review with approval or disapproval anticipated by 2024."

Section 4.12, Land Use and Planning

Page 4.12-3:

"Numerous federal, State, and local laws, regulations, policies, programs, plans, codes, and ordinances regulate land use in the SJCOG region. Local land use issues are regulated by the general plans, specific plans, and zoning ordinances adopted by San Joaquin County and the incorporated cities within the County. In addition, portions of San Joaquin County are located within the Sacramento-San Joaquin Delta, where implementation of certain projects may be subject to applicable Delta Plan policies administered by the Delta Stewardship Council, including Delta Plan Regulatory Policy DP P1, which is intended to ensure that regional and local planning efforts are based on adopted land use plans and growth forecasts and do not facilitate unplanned growth patterns that could adversely affect Delta resources. The SJCOG region itself is landlocked, surrounded by Sacramento County to the north, Stanislaus County to the south, Calaveras County and Amador County to the east, and Contra Costa County and Alameda County to the west. Thus, it is not within the immediate proximity of any local, state, or national coastal zones."

Section 4.14, Transportation

Page 4.14-21

IMPACT TRA-2 THE PROPOSED 2026 RTP/SCS WOULD RESULT IN AN OVERALL INCREASE IN REGIONAL VMT ABOVE BASELINE (2023~~5~~) CONDITIONS, BUT WOULD RESULT IN AN ~~INCREASE~~ DECREASE IN VMT PER CAPITA ABOVE BASELINE (2023~~5~~) CONDITIONS. REGIONAL VMT AND ~~VMT PER CAPITA~~ IMPACTS FROM IMPLEMENTATION OF THE PROPOSED 2026 RTP/SCS WOULD BE SIGNIFICANT AND UNAVOIDABLE. THE INDUCED TRAVEL IMPACT AT THE REGIONAL LEVEL WOULD BE LESS THAN SIGNIFICANT.

Page 4.14-22:

Table 4.14-3 VMT Results Summary

Scenario	2023	2049 Plan	2049 No Build
Base VMT (SJCOG Model)	18,773,254	<u>21,195,438</u> ~~21,418,525~~	<u>21,195,438</u> ~~21,304,545~~
Short-Term Induced VMT (SJCOG Model)	N/A	<u>241,612</u> ~~223,087~~	<u>103,124</u> ~~109,107~~
Long-Term Induced VMT (NCST)	N/A	<u>632,098</u> ~~288,867~~	<u>105,743</u> ~~45,267~~
Total Induced VMT (Hybrid)	N/A	<u>873,710</u> ~~511,954~~	<u>208,867</u> ~~154,374~~
Total VMT	18,773,254	<u>22,069,148</u> ~~21,930,479~~	<u>21,404,305</u> ~~21,458,919~~

Source: SJCOG Modelling Information

¹ Reflects all capacity increasing projects both planned and programmed

² Reflects programmed capacity increasing projects only.

As shown, the proposed 2026 RTP/SCS is projected to increase the total regional VMT above 2023 baseline conditions. Including induced travel as shown in Table 4.14-3, with implementation of the 2026 RTP/SCS, total daily regional VMT would increase by an estimated 3,295,894 ~~3,157,225~~ miles in 2049, which would be an approximately 18.17 ~~17~~ percent increase from the baseline 2023 conditions for 2049. Therefore, this impact would be significant.

For informational purposes, Table 4.14-3 shows that total regional VMT would also increase without implementation of the proposed 2026 RTP/SCS. Specifically, total daily regional VMT would increase by an estimated 2,631,051 ~~2,685,665~~ miles from baseline for 2049 without implementation of the proposed 2026 RTP/SCS, which would be an approximately 14 percent increase. This demonstrates that population growth in the SJCOG region would increase daily VMT, regardless of implementation of the proposed 2026 RTP/SCS.

Page 4.14-23:

Table 4.14-4 VMT Results Summary

Scenario	Regional VMT	VMT per Capita ¹
2023 Baseline	18,773,254	24.20
2049 with proposed 2026 RTP/SCS	<u>22,069,148</u> ~~21,930,479~~	<u>23.23</u> ~~23.08~~
2049 without proposed 2026 RTP/SCS	<u>21,404,305</u> ~~21,458,919~~	<u>23.53</u> ~~22.59~~

Source: Appendix F

¹ VMT per capita is based on a 2023 population size of 775,865 persons, and an interpolated 2049 population size of 950,019 persons.

Daily VMT per capita including induced demand would decrease from 24.20 to 23.08 miles by 2049 with implementation of the proposed 2026 RTP/SCS, a decrease of approximately 5 percent. For informational purposes, Table 4.14-4 also shows that without implementation of the proposed 2026 RTP/SCS, daily VMT per capita would decrease from 24.20 to 22.23 ~~59~~ by 2049. This would be a decrease of approximately ~~47~~ percent for 2049. As shown, the proposed 2026 RTP/SCS would fail to reach ~~1516~~ percent below baseline (2023) VMT per capita conditions in 2049. Therefore, this impact would be significant.

Page 4.14-24:

~~"TRA-2(a)~~ *Regional VMT Reduction Programs*

Implementing agencies shall require implementation of VMT reduction strategies through TDM programs, impact fee programs, mitigation banks or exchange programs, in-lieu fee programs, and other land use project conditions that reduce VMT..."

Section 4.16, Wildfire

IMPACT WF-2 ~~IMPACT WFR-2: PROPOSED TRANSPORTATION IMPROVEMENTS AND LAND USE PROJECTS ENVISIONED BY THE 2026 RTP/SCS WOULD BE LOCATED IN OR NEAR SRAs. THIS WOULD EXACERBATED WILDFIRE RISKS THAT COULD LEAD TO INCREASED POLLUTION CONCENTRATIONS, INCREASE WILDFIRE RISK ASSOCIATED WITH THE CONSTRUCTION OR MAINTENANCE OF INFRASTRUCTURE SUCH AS ROADS, AND INCREASE THE LIKELIHOOD OF POST-FIRE LANDSLIDES AND FLOODING. EXISTING REGULATIONS AND PROPOSED MITIGATION MEASURES WOULD REDUCE THIS RISK AND IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION.~~

Section 5, Other CEQA

Page 5-6 and 5-7:

5.3 List of Significant and Unavoidable Impacts

As discussed in Sections 4.1 through 4.16 of the DEIR, implementation of the proposed 2026 RTP/SCS would result in the following significant and unavoidable impacts.

...

- Impact TRA-2: ~~Regional~~ increase in VMT ~~per capita~~
- Cumulative – Transportation (increase in VMT)
- ~~Cumulative – Wildfire (construction and operation of proposed 2026 RTP/SCS projects)~~

Section 6, Alternatives

Page 6-4:

6.2 Alternatives Considered but Rejected

The *CEQA Guidelines* state that an EIR should identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination (*CEQA Guidelines* Section 15126.2(c)). Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are (i) failure to meet most of the basic project objectives, (ii), infeasibility, or (iii) inability to avoid significant environmental impacts (*CEQA Guidelines* Section 15126.6(c)). In addition, an EIR need not examine every permutation of the

alternatives as long as a reasonable range of alternatives is examined. (See *Saltonstall v. City of Sacramento* (2015) 234 Cal. App. 4th 549, 577.) Also, although an EIR must discuss alternatives to a project in its entirety, it need not necessarily discuss alternatives to each particular component of a project. (See *California Oak Foundation v. Regents of University of California* (2010) 188 Cal. App. 4th 227, 276–277.)

For this EIR, ~~three~~ two alternatives were considered by SJCOG and rejected as infeasible. These alternatives and the reasons for elimination are described below.

Page 6-24, 25:

6.6 Environmentally Superior Alternative

The proposed project was selected over Alternative 2 because it depends on a substantially greater level of transit investment and transit-supportive infrastructure than is included within the fiscally constrained RTP/SCS ~~was determined to better balance environmental considerations with regional goals and implementation feasibility~~. Specifically, the proposed 2026 RTP/SCS more effectively meets identified objectives by serving regional transportation needs, aligning with local plans and policies, and promoting equitable distribution of transportation investments and services.

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.

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Mitigation Measure/Condition of Approval	Action Required	Timing	Monitoring Requirements	Responsible Agency	Compliance Verification		
					Initial	Date	Comments
Visual Resources							
AES-1(a). Tree Protection and Replacement							
Implementing agencies shall, or can and should, ensure new roadways, extensions and widenings of existing roadways, bridge replacement and enhancements, trails and facility improvement projects shall 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 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. • Conduct periodic inspection and maintenance of replacement trees for up to 3 years to monitor and maintain their success.	During project permitting and environmental review for roadway extensions and widening projects. Implementation during construction and ongoing maintenance following installation of replacement trees for up to 3 years.	Site Plan Review and during construction.	Implementing agencies/project sponsor.			
AES-1(b). Discouragement of Architectural Features that Block Scenic Views							
Implementing agencies 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.	• Avoid the use of sound walls and other architectural features that could block views from scenic highways or other view corridors to the extent feasible. • Where sound walls are required for noise attenuation, they shall be designed to incorporate offsets, accents, and landscaping and are complementary in color and texture to surrounding natural features.	During project permitting and environmental review.	Site Plan Review.	Implementing agencies/project sponsor.			
AES-2. 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.	• Confirm that project design minimizes contrast in scale and massing between new structures associated with the project and surrounding natural forms and development. • Confirm structures, walls, and landscaping are constructed consistent with approved plans.	During project permitting and environmental review; during construction.	Site Plan Review and during construction.	Implementing agencies/project sponsor.			
AES-3(a). Roadway Lighting							
Implementing agencies 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.	• Confirm that site plans minimize roadway lighting to the extent feasible, consistent with safety and security objectives, and comply with applicable local lighting height requirements. • Confirm lights are installed as described and shown on site plans during construction.	During project permitting and environmental review; during construction.	Once during plan review. Once at completion of construction.	Implementing agencies/project sponsor.			

Mitigation Measure/Condition of Approval	Action Required	Timing	Monitoring Requirements	Responsible Agency	Compliance Verification		
					Initial	Date	Comments
AES-3(b). Lighting Design Measures							
As part of planning, design, and engineering for projects, project sponsors shall, or can and should, 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 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.			
AES-3(c). 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: - Planting trees along transportation corridors to reduce glare from the sun; - Creating tree wells in existing sidewalks; - Adding trees in new curb extensions and traffic circles; - Adding trees to public parks and greenways; - 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; and - Complying with applicable general plan policies, municipal code regulations, city or local controls related to glare - 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 incorporate the lighting design requirements listed in Mitigation Measure AES-3(b), including the use of non-glare and low-reflective finishes, landscaping where needed to screen lighting from sensitive uses, and compliance with applicable local regulations. - Confirm lighting fixtures, shielding, non-glare finishes, and any required landscaping are installed as described and shown on plans.	During project permitting and environmental review; during/after construction.	Once during plan review. Once at completion of construction.	Implementing agencies/project sponsor.			
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.	- Construction plans shall show SJVAPCD standard dust control measures. - Implementing agency shall require implementation.	During project permitting and environmental review. Prior to issuance of grading permits; during construction.	Once during plan review. As needed during active ground-disturbing construction activities to verify implementation of measures.	Implementing agencies/project sponsor.			

Mitigation Measure/Condition of Approval	Action Required	Timing	Monitoring Requirements	Responsible Agency	Compliance Verification		
					Initial	Date	Comments
- 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.							
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 require that construction equipment is subject to the CARB Regulation for In-use Off-road Diesel Vehicles. - Construction plans shall require that, if feasible, construction equipment meets Tier 4 standards or at least Tier 2 standards with retrofitted Level 3 Verified Diesel Emission Control Strategies, if available. - Perform periodic site inspections.	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(c). Electric Construction Equipment							
The implementing agency shall ensure that to the extent technologically, logistically, and economically feasible, construction equipment utilizes electricity from power poles rather than temporary diesel power generators and/or gasoline power generators.	Construction plans shall require that electricity from power poles is used to the extent possible.	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-3(a). PM ₁₀ Emissions Reduction							
To help reduce regional PM10 emissions, SJCOG, 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.	- Implement the CARB Carl Moyer Program. - Incentivize mobile PM emissions reductions. - Encourage the incorporation of TDM strategies for land use projects.	N/A	N/A	SJCOG, SJVAPCD, and implementing agencies/project sponsor.			
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, <i>Architectural Coatings</i>. - 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:	- Construction plans shall require that coatings are compliant with SJVAPCD Rule 4601. - Construction plans shall require that new developments include energy-efficient project design features such as appliances, lighting, mechanical systems, and features that promote energy-efficient transportation. - Implementing agencies shall site new developments with sensitive receptors away from roadway pollution. Construction plans shall require that there is an adequate buffer between sensitive receptors and roadway pollution. - Construction plans shall require that indoor air filtration systems rated MERV-13 or higher are	During project permitting and environmental review. Periodically during construction.	Once during plan review. Periodically during construction.	Implementing agencies/project sponsor.			

Mitigation Measure/Condition of Approval	Action Required	Timing	Monitoring Requirements	Responsible Agency	Compliance Verification		
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◦ Install indoor air filtration (as part of mechanical ventilation systems or stand-alone air cleaners) to reduce indoor 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 install 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 and bicycles) pedestrian access, and public transportation use. Such measures may include incorporation of electric vehicle charging stations, bicycle 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.	installed where adequate buffers between sensitive receptors and pollutants are infeasible. • Construction plans shall include vegetation buffers and/or sound walls between sensitive receptors and pollution sources. • Construction plans shall require that daylight, passive solar designs, and light colored “cool” roofs and pavements are implemented into project design.						
AQ-5. Health Risk Reduction Measures							
Transportation project sponsor agencies shall implement the following measures for projects that could facilitate an increase in vehicle trips: • During project-specific design and CEQA review, the potential localized particulate matter (PM10 and PM2.5) impacts and their health risks shall be evaluated for individual projects. Localized particulate matter concentrations shall be estimated using procedures and guidelines consistent with the USEPA’s 2015 <i>Transportation Conformity Guidance for Quantitative Hot-Spot Analyses in PM2.5 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 PM2.5) 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 USEPA 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 matter emissions. • For projects that do not meet SJVAPCD screening criteria, 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 install sound walls between sensitive receptors and the pollution source. In addition, consistent with the general guidance contained in CARB’s Air Quality and Land Use Handbook (2005) and Technical Advisory on Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways (2017), cities and the County shall incorporate appropriate and feasible measures into project 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	• Retain air quality consultant to conduct project-level hot spot analysis. • For projects that do not meet SJVAPCD screening criteria, require preparation of a project-level HRA by a qualified air quality consultant. • Require project-level environmental review and site plans to incorporate the measures to reduce particulate impacts, as listed in Mitigation Measure AQ-5.	During project permitting and environmental review. During construction as applicable. During initial operation as applicable.	Once during project-level environmental review. Periodically during construction. Following construction, during operation.	Implementing agencies/project sponsor.			

Mitigation Measure/Condition of Approval	Action Required	Timing	Monitoring Requirements	Responsible Agency	Compliance Verification		
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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 logistically and economically 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 intake system in the building, or in each individual residential unit, which 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. • Implement feasible attenuation measures needed to reduce potential air quality impacts to sensitive receptors such as air filtration systems.							
Biological Resources							
BIO-1(a). Biological Resources Screening and Assessment							
On a project-by-project basis, a preliminary biological resource screening shall be performed as part of the environmental review process 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) to document the existing biological resources within the project footprint plus a buffer and to determine the potential impacts to those resources. The biological resources assessment shall evaluate the potential for impacts to all biological resources including, but not limited to: special-status species, nesting birds, wildlife movement, sensitive plant communities, critical habitat, Essential Fish Habitat, and other resources judged to be sensitive by local, state, and/or federal agencies. In addition, the assessment shall document potential modifications to existing infrastructure suitable for wildlife movement (e.g., culvert, underpass, etc.). Pending the results of the BRA, design alterations, further technical studies (e.g., protocol surveys) and/or consultations with the USFWS, CDFW and/or other local, state, and federal agencies may be required. If the project cannot be designed with complete avoidance, the sponsor agency shall coordinate with the appropriate regulatory agency (i.e., USFWS, NMFS, CDFW, USACE) to obtain regulatory permits and implement project-specific mitigation prior to		• Require preliminary biological resource screening to determine whether the project has any potential to impact biological resources and whether a biological resources assessment (BRA) is required. • Retain a qualified biologist to conduct BRA if the project would have potential to impact biological resources. • Where applicable, implement avoidance, minimization, survey, consultation, permitting, and mitigation measures identified through the BRA and required by Mitigation Measures BIO-1(b) through BIO-1(j). • Where applicable, the qualified biologist shall submit a report documenting the biological		During project permitting and environmental review.	Once.	Implementing agencies/project sponsor.	

Mitigation Measure/Condition of Approval	Action Required	Timing	Monitoring Requirements	Responsible Agency	Compliance Verification		
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any construction activities, as applicable. The following mitigation measures [BIO-1(b) through BIO-1(j)] shall be incorporated only as applicable into the BRA for projects where specific resources are present or may be present and impacted by the project. Note that specific surveys described in the mitigation measures below may be completed as part of the biological resources assessment where suitable habitat is present. The results of the biological resources screening and assessment shall be provided to the implementing agency for review and approval.	resource screening and/or BRA to the implementing agency for review						
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, surveys for special-status plants shall be completed 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. All plant surveys shall be conducted by a qualified biologist approved by the implementing agency no more than two years prior to project implementation. All special-status plant species identified on-site shall be mapped onto a site-specific aerial photograph or topographic map. Surveys shall be conducted in accordance with the most current protocols established by the CNPS, CDFW and/or USFWS. 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.	• Where applicable based on the results of the biological resource screening and BRA completed pursuant to Mitigation Measure BIO-1(a), conduct surveys for special status plants in accordance with applicable protocols. • If a special-status plant survey is conducted, the qualified biologist shall submit a report of the survey to the implementing agency for review. • Implement mitigation measure BIO-1(c) if special status plant species are identified.	During project permitting and environmental review; prior to construction but no earlier than two years 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 project shall be re-designed 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 biologist 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 2026 RTP/SCS, all impacts shall be mitigated at a minimum ratio of 1:1 (number of acres or individuals restored to number of acres or individuals impacted) for each species as a component of habitat restoration. A restoration plan shall be prepared and submitted to SJCOG, and/or the local jurisdiction overseeing the project for approval. The restoration plan shall include, at a minimum, the following components: • Description of the project/impact site (i.e., location, responsible parties, areas to be impacted by habitat type); • Goal(s) of the compensatory mitigation project [type(s) and area(s) of habitat to be established, restored, enhanced, and/or preserved; specific functions and values of habitat type(s) to be established, restored, enhanced, and/or preserved]; • Description of the proposed compensatory mitigation site (location and size, ownership status, existing functions and values); • Implementation plan for the compensatory mitigation site (rationale for expecting implementation success, responsible parties, schedule, site preparation, planting plan); • Maintenance activities during the monitoring period, including weed removal as appropriate (activities, responsible parties, schedule); • Monitoring plan for the compensatory mitigation site, including no less than quarterly monitoring for the first year (performance standards, target functions and values, target acreages to be established, restored, enhanced, and/or preserved, annual monitoring reports); • Success criteria based on the goals and measurable objectives; said criteria to include numeric criteria to be selected based on the scale of the restoration effort and the restoration technique used: ◦ At least 80 percent survival of container plants, and/or ◦ Successful establishment the required number of individuals planted from seed to meet required replacement ratios; and/or	• Require redesign of the project to avoid impacting rare plant species if state or federally listed and/or CRPR 1 and 2 species are found. • Require that the qualified biologist evaluates CRPR 3 and 4 species to determine whether special-status. • Where applicable, if avoidance is not possible, require compensatory mitigation to fully offset project impacts, as identified by a qualified biologist and consistent with the restoration requirements described in Mitigation Measure BIO-1(c). • Require that a restoration plan be developed for the project and submitted to SJCOG and/or the local jurisdiction for review and approval.	During project permitting and environmental review; prior to issuance of project construction permits and approvals; quarterly during the first year of monitoring and thereafter as specified in the approved restoration plan.	Review and approve restoration plan once per project. No less than quarterly monitoring and documentation during the first year of restoration. Verify implementation of compensatory mitigation and review monitoring reports..	Implementing agencies/project sponsor.			

Mitigation Measure/Condition of Approval	Action Required	Timing	Monitoring Requirements	Responsible Agency	Compliance Verification		
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○ Sampling-based recruitment/survival criteria to achieve vegetative cover or total number of surviving individuals equal to at least 70 percent of the equivalent metric in reference sites for the same habitat type; sampling-based criteria must use a scientifically valid vegetation sampling method; ● An adaptive management program and remedial measures to address any shortcomings in meeting success criteria; ● Notification of completion of compensatory mitigation and agency confirmation; and ● Contingency measures (initiating procedures, alternative locations for contingency compensatory mitigation, funding mechanism).							
BIO-1(d). Endangered/Threatened Animal Species Habitat Assessment and Protocol Surveys							
Specific habitat assessment and survey protocol surveys are established for several federally and/or State endangered or threatened species. If the results of the biological resources assessment determine that suitable habitat may be present for any such species, protocol habitat assessments/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.	● Where applicable based on the results of the biological resource screening and BRA conduct protocol habitat assessments/surveys for federal and/or state-listed species 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 Species Avoidance and Compensatory Mitigation							
If habitat is occupied or presumed occupied by federal and/or state listed species and would be impacted by the project, the implementing agency shall design the project in coordination with a qualified biologist to avoid impacting occupied/presumed occupied habitat to the maximum extent feasible. Disturbance limits shall have bright orange protective fencing installed at least 50 feet beyond their extent, or other distance as approved by a qualified biologist, to protect the habitat. If occupied or presumed occupied habitat cannot be avoided, the implementing agency shall provide the total acreages for habitat that would be impacted prior to the issuance of construction permits/approvals. The implementing agency shall purchase credits at a USFWS, and/or CDFW approved conservation bank and/or establish conservation easements or funds for acquisition of conservation easements as compensatory mitigation to offset impacts to federal and/or state listed species habitat. Compensatory mitigation shall be provided at the following ratios for permanent impacts in accordance with the <i>San Joaquin County Multi-Species Habitat Conservation and Open Space Plan</i> (SJMSCP 2000) of not less than 1:1 (area mitigated: area impacted) for agricultural habitat lands and 3:1 for natural lands (non-wetland). 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 the implementing agency establishes conservation easement(s) (on- and/or off-site) to serve as compensatory mitigation for federal and/or state listed species habitat impacts, compensatory mitigation areas shall have a restrictive covenant prohibiting future development/disturbance and shall be managed in perpetuity to encourage persistence and enhancement of the preserved target species. Compensatory mitigation lands cannot be located on land that is currently held publicly for resource protection. The compensatory mitigation areas shall be managed by a conservation lands management entity or other qualified easement holder. In addition, 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 species. The HMMP shall identify long term site management needs, routine monitoring techniques, and success criteria, and shall determine if the conservation site requires restoration 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 approval.	● Where applicable, 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, conservation bank credits and/or conservation easements shall be purchased in accordance with the requirements of Mitigation Measure BIO-1(e). Where conservation easements are used, 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.			

Mitigation Measure/Condition of Approval	Action Required	Timing	Monitoring Requirements	Responsible Agency	Compliance Verification		
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BIO-1(f). Endangered/Threatened Species Avoidance and Minimization							
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 or candidate species with potential to occur shall be conducted by a qualified biologist where suitable habitat is present, as determined by the qualified biologist. The surveys shall occur 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 or candidate 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 by the qualified biologist 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 November 1, to avoid impacts to sensitive aquatic species. • Actual in-water work windows will be determined at the project level in consultation with applicable regulatory agencies, based on affected species and life stages, site conditions, and agency requirements. • 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 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 at a minimum 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 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.	• If applicable, project plans shall include project-specific mitigation measures to avoid and minimize impacts to endangered or threatened species.	During project permitting and environmental review; prior to and ongoing throughout project construction.	Periodically throughout construction.	Implementing agencies/project sponsor.			

Mitigation Measure/Condition of Approval	Action Required	Timing	Monitoring Requirements	Responsible Agency	Compliance Verification		
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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 and non-candidate special-status animal species: • Preconstruction clearance surveys shall be conducted within 14 days prior to the start of construction (including staging and mobilization). The surveys shall cover the entire disturbance footprint plus a minimum 100-foot buffer and shall identify all special-status animal species that may occur on-site. All non-listed special-status species shall be relocated from the site either through direct capture or through passive exclusion. A report of the preconstruction survey shall be submitted to the County by 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 preconstruction survey results. • If special-status bat species may be present and impacted by the project, within 30 days of the start of construction a qualified biologist shall conduct presence/absence surveys for special-status bats, in consultation with the CDFW, where suitable roosting habitat is present. Surveys shall be conducted using acoustic detectors and by searching tree cavities, crevices, and other areas where bats may roost. If active bat roosts or colonies are present, the biologist shall evaluate the type of roost to determine the next step. ◦ If a maternity colony is present, all construction activities shall be postponed within a 250-foot buffer around the maternity colony until it is determined by a qualified biologist that the young have dispersed or as recommended by CDFW through consultation. Once it has been determined that the roost is clear of bats, the roost shall be removed immediately. ◦ If a roost is determined by a qualified biologist to be used by a large number of bats (large hibernaculum), alternative roosts, such as bat boxes if appropriate for the species, shall be designed and installed near the project site. The number and size of alternative roosts installed will depend on the size of the hibernaculum and shall be determined through consultations with the CDFW. ◦ If other active roosts are located, exclusion devices such as valves, sheeting or flap-style one-way devices that allow bats to exit but not re-enter roosts discourage bats from occupying the site.	• Where applicable, project plans shall include project-specific mitigation measures to reduce impacts to non-listed special status species identified by the biological resource screening and/or BRA.	During project permitting and environmental review. Prior to, during and after project construction as appropriate.	During all initial ground disturbance, as applicable.	Implementing agencies/project sponsor.			
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 14 days prior to vegetation removal activities. A qualified biologist shall conduct preconstruction surveys for raptors. The survey for bald and golden eagles shall cover all areas within 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 ranging from 50 to 300 feet based on the species biology and the current and anticipated disturbance levels occurring in vicinity of the nest. The objective of the buffer shall be to reduce disturbance of nesting birds. 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 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; however, buffers may be relaxed earlier	• If applicable, a pre-construction survey for nesting birds shall be completed. If necessary, an avoidance buffer shall be implemented. • A report documenting the preconstruction surveys and nest monitoring (if applicable) shall be submitted to the implementing agency.	Within 14 days prior to the onset of vegetation removal activities occurring between February 1 and September 15. Buffers may be relaxed prior to September 15 if determined appropriate by a qualified ornithologist.	Once prior to construction. As needed throughout construction activities occurring between February 1 and September 15.	Implementing agencies/project sponsor.			

Mitigation Measure/Condition of Approval	Action Required	Timing	Monitoring Requirements	Responsible Agency	Compliance Verification		
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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). Fence and Signpost Restriction							
Any fencing posts or signs installed temporarily or permanently throughout the course of the project shall have the top three post holes covered or filled with screws or bolts to prevent the entrapment of wildlife, specifically the talons of birds of prey. Also, fencing shall incorporate wildlife friendly design elements, such as smooth wires and having a 6-inch or greater gap above grade. Fencing shall be designed to be wildlife friendly (e.g., smooth top wire, smooth bottom wire at 16 inches above grade, etc.).	- Implementing agencies shall require that fencing and signage are designed to be wildlife-friendly. - Construction plans shall require that the appropriate fencing and signage is incorporated.	Prior to the start of construction.	Once during plan review, prior to construction.	Implementing agencies/project sponsor.			
BIO-1(j). 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. - Construction personnel shall sign a form documenting WEAP training attendance and understanding. - WEAP training fact sheet shall 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							
If the results of Mitigation Measure BIO-1(a) indicate that projects implemented under the 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 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 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 waters of the State are expected to be impacted, then the RWQCB may require Waste Discharge Requirements (WDR) and/or Section 401 Water Quality Certification (depending upon whether the feature falls under federal jurisdiction). If CDFW asserts its jurisdictional authority, then a Streambed Alteration Agreement pursuant to Section 1600 et seq. of the CFGC may be required prior to construction within the areas of CDFW jurisdiction. If the USACE asserts its authority, then a permit pursuant to Section 404 of the Clean Water Act may be required.	- Where applicable, based on the results of Mitigation Measure BIO-1(a), a jurisdictional delineation shall be completed and submitted to the applicable agencies listed in this mitigation measure. - If applicable, obtain a permit pursuant to Section 404 of the Clean Water Act, Section 401 Water Quality Certification and/or Waste Discharge Requirements, and a Section 1600 Streambed Alteration Agreement, as applicable.	During project permitting and environmental review.	Once prior to construction.	Implementing agencies/project sponsor.			
BIO-2(b). Wetland, Drainages, and Riparian Habitat Restoration							
Impacts to jurisdictional drainages, wetlands and riparian habitat shall be mitigated in accordance with the SJMSCP at a minimum ratio of 2:1 preservation plus 1:1 creation for vernal pools within the Vernal Pool Zone, as mapped by the SJMSCP Zone Map, and at least 1:1 creation plus 2:1 preservation for wetlands other than vernal pools (acres of habitat restored to acres impacted) and shall occur on-site or as close to the impacted habitat as possible. A Mitigation and Monitoring Plan shall be developed by a qualified biologist in accordance with the restoration plan component requirements in mitigation measure BIO-1(c) above and shall be implemented for no less than five years after construction of the segment, or until the implementing agency and/or the permitting authority (e.g., CDFW, RWQCB, and/or USACE) has determined that restoration has been successful. Alternatively, mitigation shall be accomplished through purchase of credits from an approved wetlands mitigation bank.	- Require that, 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. - Require that a qualified biologist develop a mitigation and monitoring plan in accordance with the restoration plan requirements associated with Mitigation Measure BIO-1(c) and submitted to the implementing agency and applicable permitting authority for review and approval.	During project permitting and environmental review; implementation and monitoring for no less than five years following construction, or until the implementing agency and/or permitting authority determines restoration has been successful.	Review and approve the HMMP once prior to construction. Verify implementation of compensatory mitigation and review monitoring documentation for no less than five years, or until restoration success criteria have been achieved and approved by the implementing agency and/or permitting authority.	Implementing agencies/project sponsor. CDFW, RWQCB, and/or USACE, as applicable.			

Mitigation Measure/Condition of Approval	Action Required	Timing	Monitoring Requirements	Responsible Agency	Compliance Verification		
					Initial	Date	Comments
BIO-2(c). Landscaping Plan							
If landscaping is proposed for a specific project, a qualified biologist/landscape architect shall prepare a landscape plan for that project. This plan shall indicate the locations and species of plants to be installed. 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 as moderate to highly invasive species 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. • Plant species shall be regionally appropriate native species found in adjacent native habitats.	During project permitting and environmental review.	Once prior to construction.	Implementing agencies/project sponsor.			
BIO-2(d). Sensitive Vegetation Community Avoidance and Mitigation							
If the results of measure BIO-1(a) indicate projects implemented under the 2026 RTP/SCS would impact sensitive vegetation communities, impacts to sensitive communities shall be avoided through project design modifications. Bright orange construction fencing shall be placed a minimum of 30 feet outside the edge of areas of sensitive communities that will be retained prior to any initiation of ground disturbance activities and shall remain in place until construction is complete. No vehicles, person, materials, or equipment shall be allowed in protected areas. If the implementing agency determines that sensitive communities cannot be avoided, impacts shall be mitigated on-site or offsite at a ratio of 1:1 for permanently impacted sensitive communities (habitat restored for habitat lost). Temporarily impacted areas shall be restored to pre-project conditions. A Restoration Plan shall be developed by a qualified biologist. The Restoration Plan shall be implemented for a period of not less than five years. Off-site habitat acquisition and off-site restoration and/or enhancement may be considered if onsite restoration is determined as unachievable, as long as the off-site proposals result in equal compensatory value. Replacement ratios for off-site mitigation may be different than those required for onsite mitigation. The plan shall include, at a minimum, the same components in accordance with the restoration plan component requirements in mitigation measure BIO-1(c) above.	• 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. • Require the restoration of temporarily impacted areas to pre-project conditions. • Require that a qualified biologist develops a Restoration Plan.	During project permitting and environmental review.	Once following construction. When applicable in accordance with the Restoration Plan.	Implementing agencies/project sponsor.			
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 by the qualified biologist 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 or acceptable location 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. In areas where construction is ongoing, hydroseeding shall occur where no construction activities have occurred within six (6) weeks since ground disturbing activities ceased. If exotic species invade these areas prior to hydroseeding, weed removal shall occur in consultation with a qualified biologist and in accordance with the restoration plan.	• Retain a qualified biologist to develop an Invasive Weed Prevention and Management Program if project is in or next to native habitats. • Implement Invasive Weed Prevention and Management Program measures as applicable.	Retain qualified biologist and develop Invasive Weed Prevention and Management Program during project permitting and environmental review. Implement Invasive Weed Prevention and Management Program measures during and after construction activities.	Once prior to construction. During construction as specified by the Invasive Weed Prevention and Management Program. After construction as specified by the Invasive Weed Prevention and Management Program.	Implementing agencies/project sponsor.			

Mitigation Measure/Condition of Approval	Action Required	Timing	Monitoring Requirements	Responsible Agency	Compliance Verification		
					Initial	Date	Comments
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.	• Ensure that project plans incorporate the best management practices listed in this mitigation measure as applicable.	During project permitting and environmental review. Prior to and during construction activities as applicable.	Once prior to construction. During construction as specified by Mitigation Measure BIO-2(f).	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. Fencing or other project components shall not block wildlife movement through riparian or other natural habitat. Where fencing or other project components that may disrupt wildlife movement are required for public safety, 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; • If privacy fencing is required near open space areas, openings at the bottom of the fence shall measure at least 16 inches in diameter and be installed at reasonable intervals as defined by a qualified biologist 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; and • 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).	• 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 prior to construction.	Implementing agencies/project sponsor.			
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 complete. If water is to be diverted around work sites, a diversion plan shall be submitted to SJCOG 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 fish and wildlife movement while the diversion is in place.	• Require that construction plans and building plans avoid placement of permanent structures in drainages or rivers such that wildlife movement would be impeded. • Require that temporary impacts to stream channels are restored. • If applicable, a diversion plan shall be provided for the project.	During project permitting and environmental review. Restoration of temporary impacts to stream channels to be completed after construction is completed.	Once prior to construction. Once upon the completion of construction.	Implementing agencies/project sponsor.			

Mitigation Measure/Condition of Approval	Action Required	Timing	Monitoring Requirements	Responsible Agency	Compliance Verification		
					Initial	Date	Comments
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. • Construction work schedules shall be limited to daylight hours only, to the maximum extent practicable. • 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.	• Require construction plans to incorporate best management practices to minimize disruption to wildlife.	During project permitting and environmental review. Prior to issuance of grading and construction permits.	Ongoing throughout construction.	Implementing agencies/project sponsor.			
Cultural Resources							
CUL-1. Historical Resources Impact Minimization							
Prior to individual project permit issuance, the implementing agency of a 2026 RTP/SCS project involving earth disturbance or construction of permanent above ground structures or roadways shall, or can and should, prepare a map defining the Area of Potential Effects (APE). This map shall indicate the areas of primary and secondary disturbance associated with construction and operation of the facility and will determine whether known historical resources are located within the impact zone. If a structure greater than 45 years in age is within the identified APE, a survey and evaluation of the structure(s) to determine their eligibility for recognition under State, federal, or local historic preservation criteria shall be conducted. The evaluation shall be prepared by an architectural historian meeting the <i>Secretary of the Interior’s Standards and Guidelines for Archeology and Historic Preservation, Professional Qualification Standards</i>. The evaluation shall comply with CEQA Guidelines section 15064.5(a). The study must also analyze impacts in accordance with CEQA Guidelines section 15064.5(b). Based on the findings of the study, recommendations shall be implemented, which may include, but are not limited to, the following: • Realign or redesign projects to avoid impacts on known historic resources where possible • If avoidance of a significant architectural/built environment resource is not feasible, additional mitigation options include, but are not limited to, specific design plans for historic districts, or plans for alteration or adaptive re-use of a historical resource that follows the Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitation, Restoring, and Reconstructing Historic Buildings • Comply with existing local regulations and policies that exceed or reasonably replace any of the above measures that protect historic resources	• 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 prior to permit issuance.	Implementing agencies/project sponsor.			
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 Central California Information Center to determine whether the project area has been previously surveyed and whether resources were identified. When recommended by the Information Center, and prior to construction, implementing agencies shall, or can and should, retain a qualified archaeologist to conduct a cultural resources study that includes an archaeological survey, Native American Heritage Commission Sacred Lands File Search, background research, and recommendations for resource management strategies. Implementing agencies shall, or can and should, follow recommendations identified in the cultural resources study, which may include, but would not be limited to subsurface testing, data recovery, designing and implementing a Worker Environmental Awareness Program (WEAP), construction monitoring by a qualified archaeologist, or avoidance of sites and preservation in place. Recommended mitigation measures will be consistent with CEQA Guidelines Section 15126.4(b)(3) 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 and during construction activities.	Once prior to construction. Ongoing throughout construction.	Implementing agencies/project sponsor.			

Mitigation Measure/Condition of Approval	Action Required	Timing	Monitoring Requirements	Responsible Agency	Compliance Verification		
					Initial	Date	Comments
CUL-2(b). Unanticipated Discoveries During Construction							
If evidence of any prehistoric or historic-era subsurface archaeological features or deposits are discovered during construction-related earthmoving activities (e.g., ceramic shard, trash scatters, lithic scatters), implementing agencies shall, or can and should, halt all ground disturbing activity proximate to the discovery until a qualified archaeologist (36 CFR Section 61) can assess the significance of the find. If the find is a prehistoric archaeological site, the culturally affiliated California Native American tribe 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. Recommended mitigation measures will be consistent with State CEQA Guidelines 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. 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 may 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 require if archaeological resources are uncovered, work shall be halted until the procedures described in Mitigation Measure CUL-2(b) have been completed.	During project permitting and environmental review, prior to construction.	Once prior to construction. Ongoing throughout construction when archaeological resources are uncovered.	Implementing agencies/project sponsor.			
Agriculture and Forestry Resources							
AG-1. Impact Avoidance and Minimization							
Project sponsors shall implement measures, where feasible and necessary 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; - 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; - Achieve compensatory mitigation in advance of impacts through purchase or creation of mitigation credits, as deemed appropriate by permitting agencies; and/or - 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 Important 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.).	- 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.	Once prior to construction. Ongoing throughout construction.	Implementing agencies/project sponsor.			

Mitigation Measure/Condition of Approval	Action Required	Timing	Monitoring Requirements	Responsible Agency	Compliance Verification		
					Initial	Date	Comments
Geology and Soils							
GEO-5. Paleontological Resources Impact Mitigation							
The implementing agency of a proposed 2026 RTP/SCS project involving ground disturbing activities (including grading, trenching, foundation work and other excavations) shall, or can and should, 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 and/or could be considered a unique geologic feature, the following measures shall apply: • Projects shall 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. • Retention of a Qualified Paleontologist. A Qualified Paleontologist who is knowledgeable in the geology of California, and who has worked as a paleontological mitigation project supervisor for at least two years (SVP 2010) shall be retained to create a Paleontological Resources Monitoring and Mitigation Program (PRMMP) to direct all mitigation measures related to paleontological resources. • 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. • 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 PRMMP. 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.	• Retain a qualified paleontologist to conduct a PRA. • Place conditions of approval on project to require that procedures described in Mitigation Measure GEO-5 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 and during construction activities.	Once prior to construction. Ongoing throughout construction.	Implementing agencies/project sponsor.			

Mitigation Measure/Condition of Approval	Action Required	Timing	Monitoring Requirements	Responsible Agency	Compliance Verification		
					Initial	Date	Comments
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.	• Require that 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. • Require periodic site inspections to be conducted.	During project permitting and environmental review.	Once during project plan review. Periodically during construction.	Implementing agencies/project sponsor.			
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 development to be fully electric • 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 no-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	• Require that project plans incorporate GHG reduction measures and technologies.	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/Condition of Approval	Action Required	Timing	Monitoring Requirements	Responsible Agency	Compliance Verification		
					Initial	Date	Comments
• Provision of new or improved transit amenities (e.g., covered turnouts, bicycle racks, covered benches, signage, lighting, sidewalk connectivity, and accessible crosswalks) if project site is located along an existing transit route • Optimize transit route networks and service levels to boost ridership • 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							
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 SJCOG 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	• Implementing agencies shall require that new commercial development incorporate solar energy systems, low-flow water fixtures, and water-efficient drought-tolerant landscaping. • Implementing agencies shall require that new residential development install low-flow water fixtures and water-efficient drought-tolerant landscaping. • Implementing agencies shall require new development exceed the applicable Title 24 energy-efficient requirements • Implementing agencies shall encourage new development be fully electric.	During project design and permitting.	Once during project-level environmental review and discretionary approval decisions for land use projects.	Implementing agencies/project sponsor.			
Hazards and Hazardous Materials							
HAZ-1. Site Remediation							
If an individual project included in the 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 Mitigation Measure HAZ-1. • 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 demolition permits. Periodically during construction.	Implementing agencies/project sponsor.			
Hydrology and Water Quality							
HYD-2(a). Construction Dust Suppression Water Supply							
For all proposed 2026 RTP/SCS projects, where feasible, reclaimed and/or recycled water shall be used 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. It should be noted that use of reclaimed water in water trucks is generally no different than use of potable water, and therefore use of reclaimed water in projects that will require the use of water trucks should be given extra consideration as a measure which can enable use of reclaimed water in areas where it would otherwise be impossible due to lack of infrastructure. This measure shall be noted on construction plans and shall be spot checked by the local jurisdiction.	• Construction plans shall specify that reclaimed and/or recycled water must be used where feasible for dust suppression activities. • Local jurisdictions shall require compliance with this specification in the construction plans.	During project permitting and environmental review. During construction activities requiring dust suppression.	Prior to construction. Ongoing throughout construction.	Implementing agencies/project sponsor.			

Mitigation Measure/Condition of Approval	Action Required	Timing	Monitoring Requirements	Responsible Agency	Compliance Verification		
					Initial	Date	Comments
HYD-2(b). Landscape Watering							
In jurisdictions that do not already have an appropriate local regulatory program related to landscape watering, or for proposed 2026 RTP/SCS projects that are not required to comply with AB 1881, 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 would feasibly be utilized for project landscape watering due to proximity of reclaimed water sources but is unavailable due to lack of connecting infrastructure, local agencies or transportation sponsors 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.	• Construction plans shall require that landscaping design incorporates drought tolerant plants, drip irrigation, and native plant species. • Landscaping associated with new developments shall be maintained with reclaimed water when feasible. • Implementing agencies or project sponsors shall conduct an analysis of upgrades necessary to provide infrastructure facilitating use of reclaimed water.	During project permitting and environmental review. During and after construction as appropriate.	Once. Ongoing maintenance following the completion of construction.	Implementing agencies/project sponsor.			
Noise							
N-1. Construction Noise Reduction							
To reduce construction noise levels to achieve applicable standards and prevent a substantial increase in ambient noise levels, implementing agencies for transportation and land use projects shall implement the measures identified below where feasible and necessary. • 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 related to construction noise. 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. • 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. • 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. • 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. • 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. • Construction Activity Timing Restrictions. The following timing restrictions shall apply to 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 • Placement of Stationary Noise Sources. Locate stationary construction noise sources, e.g., generators, as far from noise-sensitive receptors as possible. Stationary construction noise sources that must be located near existing receptors will be equipped with the best available mufflers.	• Require compliance with local noise ordinance requirements relating to construction near 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 and during construction activities.	Ongoing throughout construction.	Implementing agencies/project sponsor.			

Mitigation Measure/Condition of Approval	Action Required	Timing	Monitoring Requirements	Responsible Agency	Compliance Verification		
					Initial	Date	Comments
N-2. Noise Assessment and Control for Mobile and Point Source Reduction							
Implementing agencies shall complete detailed noise assessments using applicable guidelines (e.g., Caltrans Traffic Noise Analysis Protocol) for roadway and rail projects that may impact noise sensitive receptors. The implementing agency shall ensure that a noise survey is conducted that, at a 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 roadways or transit 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 will be 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) will be considered. Long expanses of walls or fences should be interrupted with offsets and provided with accents to prevent monotony. Landscape pockets and pedestrian access through walls should 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” can 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.	• Require the completion of noise assessments. • Place conditions of approval to require implementation of recommendations from project-specific noise assessments.	During project permitting and environmental review. Prior to issuance of grading or building permits,	Once prior to construction activities. Implement measures as needed during construction.	Implementing agencies/project sponsor.			
N-3(a). Vibration Mitigation for Construction of Transportation Projects							
Where local vibration and groundborne noise standards do not apply, implementing agencies of 2026 RTP/SCS projects utilizing heavy construction equipment shall estimate vibration levels generated by construction activities and use the Caltrans vibration damage potential threshold criteria to screen for and screen out projects as to their potential to damage buildings on site or near a project. If construction equipment would generate vibration levels exceeding acceptable levels as established by Caltrans, 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.	• Retain a qualified geotechnical engineer and qualified historic preservation professional and/or structural engineer to complete geotechnical testing for older structures within 50 feet of pile driving. • Prepare and submit a report to the lead agency and implement measures identified by the qualified geotechnical engineer and qualified historic preservation professional and/or structural engineer.	During project permitting and environmental review. Prior to and during pile driving activities for transportation projects.	Once prior to construction activities. Implement measures as needed during construction.	Implementing agencies/project sponsor.			

Mitigation Measure/Condition of Approval	Action Required	Timing	Monitoring Requirements	Responsible Agency	Compliance Verification		
					Initial	Date	Comments
• To minimize disturbance withing 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							
N-3(b). Vibration Mitigation for Operation of Transportation Projects							
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 flating 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 ◦ Construct 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	• Require completion of vibration assessments. • Place conditions of approval on the project requiring implementation of recommendations in project-specific vibration assessments.	During project permitting and environmental review. Prior to issuance of grading or building permits.	Once prior to construction. During construction and operation as identified by project-specific noise assessments.	Implementing agencies/project sponsor.			
N-4. Noise Mitigation for Land Uses							
If a land use project is located in an area with exterior ambient noise levels that may exceed local noise standards, the implementing agency shall ensure that a noise study is conducted to determine the existing and projected exterior noise levels in the vicinity of the project. If the project residents would be exposed to noise levels exceeding local standards or to a substantial increase in ambient noise levels lo, 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. • Where warranted, require a noise study to be conducted.	During project permitting and environmental review. During construction.	Once prior to construction. During construction and operation as identified by project-specific noise assessments.	Implementing agencies/project sponsor.			

Mitigation Measure/Condition of Approval	Action Required	Timing	Monitoring Requirements	Responsible Agency	Compliance Verification		
					Initial	Date	Comments
Transportation							
TRA-2. Regional VMT Reduction Programs							
Implementing agencies shall require implementation of VMT reduction strategies through TDM 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. Modifications may include but are not limited to:	• Require the inclusion of VMT reduction strategies included in Mitigation Measure TRA-2 at a program and project-level.	During project permitting and environmental review.	Once.	Implementing agencies/project sponsor.			
• Provide car-sharing, vanpool, bike sharing, and ride-sharing programs, such as dibs • Implement or provide access to commute reduction programs, such as the measures included in Rule 9410 adopted by the San Joaquin Valley Air Pollution Control District • Provide a bus rapid transit system • Improve pedestrian or bicycle networks or transit service, such as the planned ACE Forward passenger rail service extension • Provide transit passes • Provide a van pool program, such as CalVans and Commute with Enterprise • Encourage telecommute programs • Purchase AB 130 VMT mitigation credits • Incorporate affordable housing into the project • Increase density • 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 • Provide traffic calming • Provide bicycle parking • Limit parking • Separate out parking costs • Provide parking cash-out programs • Provide incentives to purchase electric vehicles • Construct intelligent transportation system management/intelligent transportation system (TSM/ITS) measures such as ramp metering, signalization of intersections, and changeable message signs • Provide a VMT mitigation bank or exchange program							
Tribal Cultural Resources							
TCR-1. Tribal Cultural Resources Impact Minimization							
Implementing agencies shall, or can and should, comply with AB 52, which requires formal tribal consultation. If the implementing agency determines that a project may cause a substantial adverse change to a tribal cultural resource, they shall, or can and should, implement mitigation measures identified in the consultation process required under PRC Section 21080.3.2, or shall, or can and should, implement the following measures where feasible to avoid or minimize the project specific significant adverse impacts:	• Require compliance with AB 52. • If a project may impact a tribal cultural resource, implement mitigation required under PRC Section 21080.3.2 and as identified in Mitigation Measure TCR-1.	During project permitting and environmental review. During construction as warranted.	Ongoing throughout project construction.	Implementing agencies/project sponsor.			

Mitigation Measure/Condition of Approval	Action Required	Timing	Monitoring Requirements	Responsible Agency	Compliance Verification		
					Initial	Date	Comments
• Avoidance and preservation of the resources in place, including, but not limited to planning and construction 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 considering 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 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							
Wildfire							
WF-1(a). Wildfire Risk Reduction							
If an individual transportation or land use project included in 2026 RTP/SCS is located within or less than two miles from an SRA or very high fire hazard severity zone, 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 San Joaquin 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 to keep overgrown and unmanaged vegetation, accumulations of trash and other flammable material away from structures. • 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. • 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. • Encourage the use of fire-resistant vegetation native to San Joaquin County and/or the local microclimate of the project site and discourage the use of fire-prone species especially non-native, invasive species. • 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 should 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.	• 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/Condition of Approval	Action Required	Timing	Monitoring Requirements	Responsible Agency	Compliance Verification		
					Initial	Date	Comments
Smoking and open fires shall be prohibited at individual transportation or land use projects sites included in 2026 RTP/SCS during construction and operations. A copy of the notification to all contractors regarding prohibiting smoking and burning shall be provided to the County.							
WF-1(b). Fire Protection Plan							
Individual transportation or land use projects included in the 2026 RTP/SCS shall prepare a Fire Protection Plan that meets Fire Prevention Bureau of San Joaquin County requirements. The plan shall contain (but not be limited to) the following provisions: - All construction equipment shall be equipped with appropriate spark arrestors and carry fire extinguishers. - A fire watch with appropriate firefighting equipment shall be available at the project site at all times when welding activities are taking place. Welding shall not occur when sustained winds exceed that set forth by the Fire Prevention Bureau of San Joaquin County unless a Fire Prevention Bureau of San Joaquin County-approved wind shield is on site. - A vegetation management plan shall be prepared to address vegetation clearance around all future transportation projects. - Operational fire water tanks shall be installed prior to construction. - Provisions for fire/emergency services access if roadway blockage occurs due to large loads during construction and operation. - Cleared, maintained parking areas shall be designated; no parking shall be allowed in non-designated areas. - The need for and/or use of dedicated repeaters for emergency services. - Appropriate hot work permits (such as cutting and welding permits) shall be obtained from the jurisdictional fire agency.	If a project is within two miles of an SRA or VHFHSZ, prepare and implement a Fire Protection Plan consistent with the provisions of Mitigation Measure WF-1(b) and Fire Prevention Bureau of San Joaquin County requirements.	During project permitting and environmental review.	Once.	Implementing agencies/project sponsor.			

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