



# 2018 Regional Transportation Plan/ Sustainable Communities Strategy

Final Programmatic Environmental Impact Report

SCH#2017032042

*prepared by*

**San Joaquin Council of Governments**

555 East Weber Avenue

Stockton, California 95202

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*prepared with the assistance of*

**Rincon Consultants, Inc.**

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Fresno, California 93720

**June 2018**



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## Appendices

None

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# 1 Introduction

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## 1.1 Purpose

This document is the Final Programmatic Environmental Impact Report (FEIR) for the 2018 Regional Transportation Plan/Sustainable Communities Strategy (2018 RTP/SCS). This document, in combination with the Draft EIR (DEIR) and its technical appendices comprise the FEIR. This document has been prepared by the San Joaquin Council of Governments (SJCOG) in accordance with the California Environmental Quality Act (CEQA).

A Final EIR is required under Section 15132 of the State CEQA Guidelines to include the DEIR, comments, response to comments, revisions as necessary and recommendations received on the DEIR, of the lead agency to significant environmental issues raised by those comments in the review and consultation process, and any other relevant information added by the lead agency. A Mitigation Monitoring and Reporting Program is also required, and is included as Section 4.0 of this FEIR.

The receipt and response to comments is an important part of the CEQA process as it allows the opportunity to review and comment on the methods of analysis contained within the DEIR, provides ability to check for accuracy of the analysis and detect any omissions which may have occurred during preparation of the DEIR, and to address public concerns regarding environmental impacts.

Furthermore, this document also provides revisions to the DEIR made in response to comments, staff review, and/or changes that have occurred since the public review of the DEIR. These revisions also correct, clarify, and amplify the text in the DEIR, as appropriate, and do not alter the conclusions of the DEIR. The Final EIR, which includes the responses to comments, the Draft EIR, and the Mitigation Monitoring and Reporting Program, will be used by the SJCOG Board in the decision-making process for the 2018 RTP/SCS.

## 1.2 EIR Process

As defined in Section 15050 of the State CEQA Guidelines, SJCOG is the lead agency which prepared both the Draft and Final Program EIR for the project, the 2018 RTP/SCS.

SJCOG distributed a Notice of Preparation (NOP) of the 2018 RTP/SCS EIR for a 30-day agency and public review period starting on March 10, 2017 and ending on April 10, 2017. In addition, SJCOG held a Scoping Meeting on March 30, 2017. The meeting, held from 4:00 PM to 6:00 PM, was aimed at providing information about the 2018 RTP/SCS EIR to members of public agencies, interested stakeholders and residents/community members. The meeting was held at the San Joaquin Council of Governments at 555 East Weber Avenue in Stockton, CA. The City received letters from three agencies and three individuals in response to the NOP during the public review period. The Draft EIR for the project was circulated for a 45-day public review period beginning on March 13, 2018. The comment period was extended from the original closing date of April 26, 2018 to April 30, 2018. A total of 10 commenters submitted written comment letters on the Draft EIR, and public testimony was taken during the Public Hearing held by SJCOG at the City of Lathrop City Council Chambers on April 4, 2018, and at the SJCOG Policy Board Hearing on April 26, 2018.

## 1.3 Content of the Final EIR

Pursuant to Section 15088 of the State CEQA Guidelines, SJCOG has reviewed and addressed all comments received on the Draft Program EIR by the comment period deadline. Included within the Final Program EIR are the written comments that were submitted during the required public comment period and oral comments received at the two public hearings.

In order to adequately address the comments provided by interested agencies and the public in an organized manner, this Final Program EIR includes the Draft Program EIR with appendices, and the following sections:

- **Section 1.0: Introduction.** This chapter provides a brief introduction to the FEIR and its contents.
- **Section 2.0: Corrections and Additions.** This chapter provides a list of corrections and additions to the DEIR. None of the changes substantively change the conclusions presented in the DEIR.
- **Section 3.0: Responses to Comments.** This chapter provides a list of commenting agencies, organizations, and individuals. Comments made by both the public agencies and interested parties, and responses to each comment, are also included in this chapter.
- **Section 4.0: Mitigation Monitoring and Reporting Program.** This chapter includes the Mitigation Monitoring and Reporting Program (MMRP) prepared in compliance with the requirements of Section 21081.6 of the California Public Resources Code and Section 15091(d) and 15097 of the State CEQA Guidelines.

## 1.4 Review and Certification of the Final EIR

Consistent with CEQA (Public Resource Code Section 21092.5), responses to agency comments are being forwarded to each commenting agency 10 days prior to potential certification of the FEIR. In addition, responses are also being distributed to all commenters who provided an address. The FEIR is available for public review at SJCOG's offices at 555 East Weber Avenue, Stockton, CA, and the FEIR can be downloaded at [www.sjcog.org/eir](http://www.sjcog.org/eir).

## 2 Corrections and Additions

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The following revisions were made to the text of the 2018 RTP/SCS DEIR. Amended text is identified by page number. Clarifications and corrections to the DEIR text are shown with underlining and text removed from the Draft EIR is shown with ~~striketrough~~. DEIR text that does not require any changes is shown before and after the change to show context and location of the amended text.

All project revisions fall within the scope of the original project analysis included in the DEIR and do not result in an increase in impacts, new mitigation measures or any new impacts. No new significant environmental impacts would result from the clarifications and corrections shown here. Therefore, no significant revisions have been made that would require recirculation of the DEIR pursuant to State CEQA Guidelines Section 15088.5 (Recirculation of an EIR Prior to Certification).

### Section 4.3, Air Quality

#### Page 106

- State and federal eight-hour ozone
- State 24-hour ~~PM<sub>10</sub>~~ PM<sub>10</sub>
- State and federal PM<sub>2.5</sub>

#### Page 110

- **2015 Plan for the 1997 PM<sub>2.5</sub> standard (adopted April 2015).** Ensures attainment of 1997 federal annual PM<sub>2.5</sub> standard of 15 µg/m<sup>3</sup> and 24-hour PM<sub>2.5</sub> standard of 65 µg/m<sup>3</sup>.
- **2012 PM<sub>2.5</sub> Plan (adopted December 2012).** Addresses federal 24-hour PM<sub>2.5</sub> standard of 35 µg/m<sup>3</sup> established in 2006.
- **1997 Ozone Plan (adopted April 2007).** Addresses the federal 8-hour ozone standard of 84 parts per billion (ppb) established in 1997. FHWA/FTA's Interim Guidance on Conformity Requirements for the 1997 NAAQS issued on April 23, 2018 does not require that areas in non-attainment of the 2008 Ozone Standard address 1997 ozone in their regional conformity analyses at this time. However, the San Joaquin Valley MPOs have voluntarily included 1997 ozone conformity demonstration for the 2018 RTP/2019 RTIP to minimize project delivery risk.

#### Page 113

As shown below, all criteria pollutants are expected to decrease under 2042 conditions with the project, except for PM<sub>10</sub>, which would minimally increase by about 0.1 ton per day. However, San Joaquin County and the SJVAB are in attainment for PM<sub>10</sub> standards and would continue to be in attainment of PM<sub>10</sub> standards with implementation of the 2018 RTP/SCS, as further discussed below under Impact AQ-5.

#### Page 113

In addition, SJVAPCD Rule 9410 requires employers with at least 100 employees to develop and implement an Employer Trip Reduction Implementation Plan (eTRIP) to reduce employee ~~tree~~ trips.

**Page 118**

A conformity analysis was performed for the 2018 RTP/SCS and found that project emissions would be within emission budgets for CO, ozone, PM<sub>10</sub>, and PM<sub>2.5</sub>. Therefore, the project would not conflict with the SIP.

*Section 4.6, Energy*

**Page 174**

**Table 1 2015 Daily and Annual VMT for the SJCOG Region**

Full Fleet	Daily VMT	Annual VMT
SJCOG Total	<u>17,991,590</u> <del>17,868,785</del>	6,522,106,729

Source: SJCOG 2018

**Page 184**

**Table 2 Direct and Indirect Transportation Energy Use**

Year	Daily VMT	Direct Daily Energy Use (Billion Btu)	Indirect Energy Use (Daily Billion Btu)	Total Energy Use (Daily Billion Btu)	Per Capita Energy Use (Daily Thousand Btu)
Baseline (2015)	<u>17,991,590</u> <del>17,868,785</del>	163.18	53.66	216.84	299.71
2018 RTP/SCS	23,276,601	212.56	69.90	282.46	268.95
"No Build" 2042 Scenario	22,886,360	209.00	68.73	277.73	264.45

Notes: Daily VMT and Btu/VMT used to identify direct daily energy use utilizes information found in Table 17 and Table 18. Indirect energy use utilizes Daily VMT data from Table 17 and applies the energy consumption rates found in Caltrans' *Energy and Transportation Systems* (1983). Per capita results are identified by adding the direct and indirect energy use for each scenario and dividing by the 2015 population (723,496) (U.S. Census Bureau 2017) and the forecasted 2042 population (1,050,218) (SJCOG 2018).

Sources: California Department of Transportation (Caltrans). July 1983. *Energy and Transportation Systems*. [http://www.oregon.gov/ODOT/GeoEnvironmental/Docs\\_Environmental/Energy\\_Trans\\_Systems.pdf](http://www.oregon.gov/ODOT/GeoEnvironmental/Docs_Environmental/Energy_Trans_Systems.pdf).

*Section 4.7, Environmental Justice*

**Page 198**

**IMPACT EJ-2 THE BENEFITS DERIVED FROM THE 2018 RTP/SCS IN TERMS OF TRAVEL TIMES AND ACCESSIBILITY BY TRANSIT, SINGLE-OCCUPANCY VEHICLES, BICYCLING OR WALKING AND ACCESS AND AVAILABILITY OF HOUSING OPTIONS WILL NOT BE SUBSTANTIALLY LESS IN ENVIRONMENTAL JUSTICE COMMUNITIES IN THE SJCOG REGION. IMPACTS WOULD BE LESS THAN SIGNIFICANT.**

The 2018 RTP/SCS identifies several performance measures to evaluate the effectiveness of the SCS at achieving SJCOG's planning goals and objectives. ~~Performance measures related to social equity and mobility include but are not limited to:~~

- ~~▪ Average travel time driving alone and carpooling (minutes)~~

- ~~Work related trips less than 30 minutes driving alone or carpooling~~
- ~~Average travel time for public transit (minutes)~~
- ~~Average travel time for walking (minutes)~~
- ~~Average travel time for bicycling (minutes)~~
- ~~Household transit access within 0.5 miles~~

## Section 4.9, Greenhouse Gas Emissions

### Page 214

Industrial sources are the second-largest source of the state’s GHG emissions, contributing 23 percent of the state’s GHG emissions (CARB 2017c). California’s relatively high magnitude of GHG emissions are due largely to its greater size and population as compared to other states.

### Page 218

The 2017 Scoping Plan relies on the continuation and expansion of existing policies and regulations, such as the Cap-and-Trade Program, as well as implementation of recently adopted policies ~~and policies~~, such as SB 350 and SB 1383 (see below).

### Page 219

## Regional and Local

### *dibs* (formerly Commute Connection)

**dibs** (formerly Commute Connection) is a program of SJCOG serving San Joaquin, Stanislaus, and Merced counties. It was established to promote and encourage smart travel through carpooling, vanpooling, riding transit, walking, & biking. The program's core focus is to reduce single occupant vehicle commutes, thus reducing congestion and improving air quality.

### Page 219

Table 25 Local GHG Reduction Plans in the SJCOG Region

Jurisdiction	Type	Status	Baseline Annual Emissions (MT CO <sub>2</sub> e)	Emission Targets	
				2020	2030
City of Lodi	Climate Action Plan	Adopted November 2014	2008: 486,628	4.5 MT CO <sub>2</sub> e/ service population	3.0 MT CO <sub>2</sub> e/ service population
City of Manteca	Climate Action Plan	Adopted October 2013	2005: 400,346	429,693 MT CO <sub>2</sub> e 4.91 MT CO <sub>2</sub> e/ service population	–
City of Stockton	Climate Action Plan	Adopted August 2014	2005: 2,360,932	2,122,000 MT CO <sub>2</sub> e	–
City of Tracy	Sustainability Action Plan	Adopted February 2011	2006: 11.6 <u>per capita</u>	9.86 MT CO <sub>2</sub> e <u>per capita</u>	–

Sources: City of Lodi 2014, City of Manteca 2013, City of Stockton 2014, City of Tracy 2011

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*Other Local Plans*

GHG reduction policies can also be found in other local plans, particularly General Plans. The General Plans for San Joaquin County, City of Escalon, City of Lodi, City of Stockton, and City of Tracy all include policies to reduce GHG emissions, such as policies to promote infill development, development near transit, waste diversion, development of active transportation infrastructure, energy-efficient building design, and planting of shade trees.

A summary of GHG reduction policies adopted by jurisdictions in San Joaquin County are summarized below.

**SAN JOAQUIN COUNTY GENERAL PLAN 2035 (2016)**

The County's General Plan 2035 includes a suite of policies that support reductions in GHG emissions by promoting transportation alternatives to single occupancy driving, energy efficiency, incorporation of sustainable technologies, alleviation of congestion, sustainable land use patterns (including infill development), development of alternative fueling stations, and other sustainability strategies. Appendix A of the General Plan provides a compilation of Sustainability Policies and Programs with some quantified emission reductions (County of San Joaquin 2016).

**Pages 222**

Because mobile source emissions comprise the majority of the project's associated emissions, overall, regional emissions would decrease under 2042 with project conditions by ~~648,843~~ 431,548 MT CO<sub>2</sub>e relative to 2015 conditions.

**Pages 222-223**

Under 2042 with project conditions, per capita emissions would decrease to ~~2.6~~ 3.1 MT CO<sub>2</sub>e. This level of emissions would be consistent with the trajectory set by the 2030 and 2050 targets, which, assuming a linear trajectory, would require an emission reduction of 0.2 MT CO<sub>2</sub>e per capita per year between 2030 and 2050, resulting in a 2042 target of 3.6 MT CO<sub>2</sub>e per capita. Because 2042 with project emissions would be below 3.6 MT CO<sub>2</sub>e per capita, the project would be consistent with statewide per-capita targets and the project would not generate substantial quantities of GHG emissions. Project impacts would remain less than significant.

**Table 26 Net Change in Operational GHG Emissions (tons/day) (MT CO<sub>2</sub>e/year)**

Emission Sources	Annual Emissions (MT CO <sub>2</sub> e)	
	SJCOG 2015 Baseline	2042 with Project
Mobile sources (all vehicle classes)	3,620,070	<del>2,834,590</del> 2,894,005
Residential electricity	216,852	320,597
Commercial electricity	184,749	211,245
Residential Natural Gas	11,543	17,024
Commercial Natural Gas	3,524	4,030
Waste Disposal	747	1,081
Water treatment, conveyance, distribution, and wastewater treatment	167	241
<b>Total</b>	<b>4,037,652</b>	<b><del>3,388,809</del> 4,003,438</b>
Net Change	-	<del>-648,843</del> 431,548
Per Capita Emissions	4.3	<del>2.6</del> 3.1

Notes: Calculations for emissions from non-mobile sources are provided in Appendix C. Mobile source emissions were calculated using EMFAC 2014.

**Page 225**

The 2017 Scoping Plan outlines the state’s roadmap for achieving GHG emission targets encoded in AB 32 and SB 32. As discussed above under “Significance Thresholds,” SB 375 comprises one of California’s the key strategies included in the 2017 Scoping Plan to reduce GHG emissions from transportation sources, which generate the majority of California’s GHG emissions. SB 375 requires that local MPOs develop integrated land use and transportation plans to meet GHG reduction targets for cars and light trucks established by CARB; importantly, CARB is required to review and revise reduction targets every eight years, allowing for increasingly stringent reduction targets over time and updated time horizons. According to the Scoping Plan, with implementation of SB 375, and other strategies outlined in the Scoping Plan, California will be able to meet statewide targets set forth in AB 32 and SB 32.

For San Joaquin County, the current per capita emission reduction targets set by CARB are a five percent reduction relative to 2005 levels by 2020, and a 10 percent reduction from 2005 levels by 2035. Table 27 shows SB 375 regional emissions and targets for 2020 and 2035, as well as 2005 baseline conditions. As shown in Table 27, the 2018 RTP/SCS exceeds currently adopted targets, providing GHG reductions of 7.0 percent in 2020 and 17.6 percent in 2035. In addition, as discussed under Impact GHG-1, plan-level emissions would meet statewide per capita targets consistent with AB 32, SB 32, and the state’s long-term 2050 target, set forth in EO S-3-05. Therefore, the project would not impede California’s achievement of statewide targets encoded in AB 32 and SB 32. There would be no impact. Table 27 shows SB 375 regional emissions for 2005 baseline conditions, 2020, 2035, and 2042. As shown in Table 27, the 2018 RTP/SCS meets currently adopted targets, providing GHG reductions of 8.0 percent in 2020 and 15.7 percent in 2035, compared to the 2005 baseline. In addition, per capita emissions would continue to decline over the 2018 RTP/SCS time horizon, resulting in a 21.2 percent reduction relative to the 2005 baseline by 2042, as illustrated in Figure 13a. By meeting and exceeding the SB 375 targets in effect at the time of adoption of the 2018

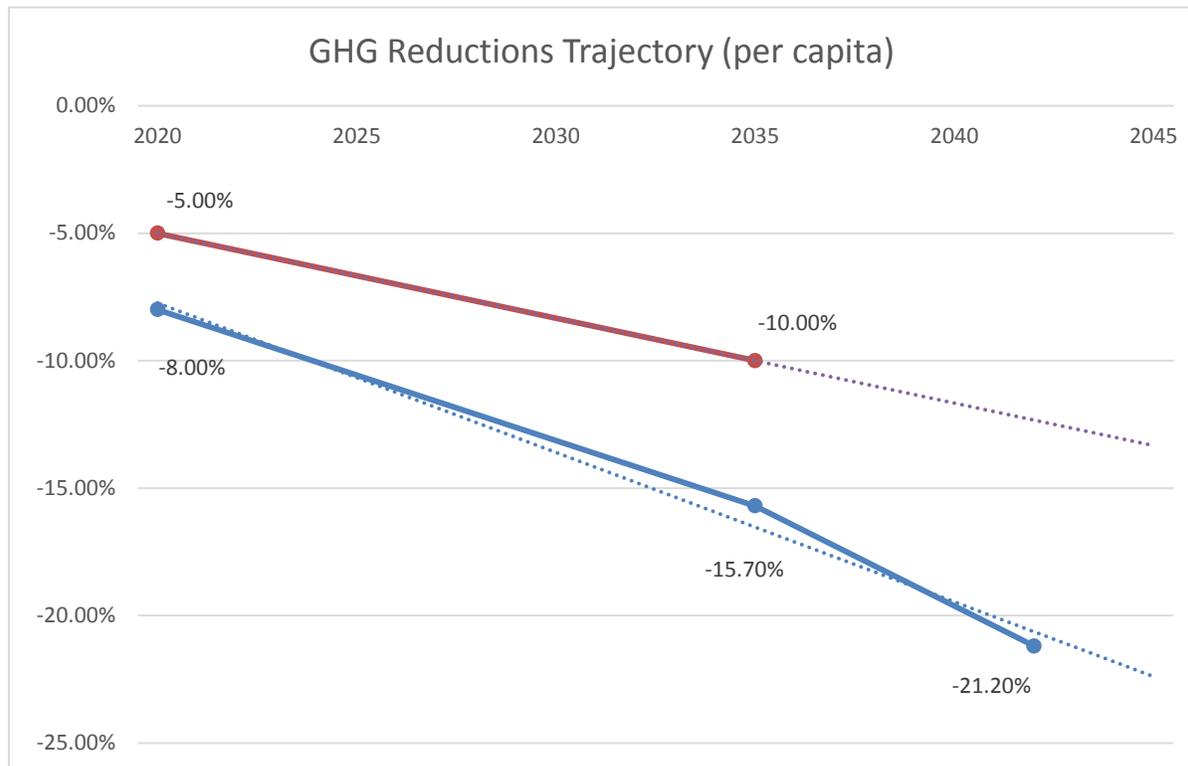
RTP/SCS, as well as achieving a 21 percent decrease in per capita GHG emission by 2042, the 2018 RTP/SCS would fulfill its SB 375 compliance.

Table 27 SB 375 Regional Emissions and Targets

Scenario	CO <sub>2</sub> Emissions (lbs/day)	Population	Per Capita CO <sub>2</sub> Emissions (lbs/day/person)	% Reduction in Per Capita Emissions Compared to 2005 Baseline	% Reduction in Per Capita Emissions Compared to 2005 Baseline (Adjusted per CARB Methodology) <sup>1</sup>
2005 Baseline	<del>13,307,632</del> <u>12,072,000</u>	652,339	<del>20.4</del> <u>18.5</u>		-
2020 with 2018 RTP/SCS	<del>14,714,243</del> <u>13,264,000</u>	775,819	<del>19.0</del> <u>17.1</u>	<u>7.6</u>	<del>7.0</del> <u>8.0</u>
2035 with 2018 RTP/SCS	<del>15,927,732</del> <u>14,886,000</u>	947,835	<del>16.8</del> <u>15.7</u>	<u>15.1</u>	<del>17.6</del> <u>15.7</u>
<u>2042 with 2018 RTP/SCS</u>	<u>15,440,000</u>	<u>1,050,218</u>	<u>14.7</u>	<u>20.6</u>	<u>21.2</u>

<sup>1</sup> The CARB requires the percent reduction determined using outputs from EMFAC2014 to be adjusted to account for changes resulting from use of EMFAC2011 in the previous RTP/SCS. Thus, the adjusted percent reduction provides the change in emissions without changes resulting from updates to the EMFAC model. The adjustment was calculated in accordance with CARB guidance.

Figure 13a SB 375 Reduction Trajectory (Per Capita GHG Emissions)



The 2017 Scoping Plan also includes a number of State goals for reducing VMT and GHG emissions relevant to the 2018 RTP/SCS, including the following:

- Promote all feasible policies to reduce VMT, including:
  - Land use and community design that reduce VMT,
  - Transit oriented development,
  - Complete street design policies that prioritize transit, biking, and walking, and
  - Increasing low carbon mobility choices, including improved access to viable and affordable public transportation and active transportation opportunities.
- Promote transportation fuel system infrastructure for electric, fuel-cell, and other emerging clean technologies that is accessible to the public where possible, and especially in underserved communities, including environmental justice communities.
- Increase the number, safety, connectivity, and attractiveness of biking and walking facilities to increase use.
- Promote shared-use mobility, such as bike sharing, car sharing and ride-sourcing services to bridge the “first mile, last mile” gap between commuters’ transit stops and their destinations.
- Quadruple the proportion of trips taken by foot by 2030
- Strive for a nine-fold increase in the proportion of trips taken by bicycle by 2030 (from a baseline of the 2010–2012 California Household Travel Survey).
- Strive, in passenger rail hubs, for a transit mode share of between 10 percent and 50 percent, and for a walk and bike mode share of between 10 percent and 15 percent

The 2018 RTP/SCS would promote compact and infill development and includes active transportation and transit projects that would support reductions in GHG emissions from passenger vehicles. Therefore, the 2018 RTP/SCS would support applicable goals included in the 2017 Scoping Plan to reduce GHG emissions from transportation sources.

The 2018 RTP/SCS alone is not intended to meet the AB 32 and SB 32 emissions reduction targets. Given that the primary statutory responsibility of the 2018 RTP/SCS is to achieve SB 375 targets, which it does, and supports applicable goals included in the 2017 Scoping Plan, the 2018 RTP/SCS has successfully contributed its share to meeting AB 32 and SB 32 targets. In addition, as discussed under Impact GHG-1, plan-level emissions would meet statewide per capita targets consistent with AB 32, SB 32, and the state’s long-term 2050 target, set forth in EO-S-3-05. Therefore, the project would not impede California’s achievement of statewide targets. Based on the above and previous analysis there would be no impact.

**Pages 227-228**

## **Mitigation Measures**

### *GHG-Cumulative<sub>1</sub> Regional Measures to Support GHG Reductions*

To support GHG reductions on a regional level, as well as address the gap between SB 375 and needed reductions from the transportation and land use sectors to achieve statewide targets, SJCOG shall take the following actions, as feasible (most of the following measures have been adapted from Appendix C of the 2017 Scoping Plan):

- Explore and develop financing and tools to support more efficient and more equitable development, including reducing barriers to housing development in infill areas; promoting

infill development and necessary infrastructure in existing communities; and implementing strategies to ensure that long-time residents can stay in place as neighborhoods improve.

- Support transportation policies such as priced express lanes, reduced parking requirements for development, and transit commuter incentives that promote infill development and reduce vehicle miles traveled.
- Explore transit pass subsidies or other ways to reduce transit fares, particularly for disadvantaged communities, students, seniors, the disabled, and other transit-dependent users.
- Support expansion and improvement of active transportation infrastructure to help meet the California Transportation Plan goal of quadrupling active transportation mode share by 2040.
- Explore ways to expand access to car share, bike share, and ride share services.
- Explore ways to increase use of lower-carbon construction materials for transportation infrastructure projects.
- Implement sustainable landscaping practices for transportation infrastructure projects that contribute to the enhancement of a multi-modal transportation system.
- Explore ways to:
  - Promote teleworking and alternative work schedules.
  - Incentivize use of transit and active transportation for commuting.
  - Increase ride sharing to work to help meet the California Transportation Plan goal of increasing carpool vehicles by 15% by 2040.
- Coordinate with CARB and air districts in efforts to implement the latest Scoping Plan
- Continue coordination with other MPOs regarding statewide strategies to reduce GHG emissions and facilitate the implementation of SB 375

### GHG-Cumulative 2 Project-Level Measures to Support GHG Reductions

Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SJCOG has identified mitigation measures capable of avoiding or reducing the potential to conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emission of GHGs that are within the jurisdiction and authority of CARB, local air districts, and/or project sponsor agencies. Where the project sponsor agency has identified that a project has the potential to conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emission of GHGs, the project sponsor agency can and should consider mitigation measures to mitigate the significant effects of greenhouse gas impacts to ensure compliance with all applicable laws, regulations, governing CAPs, general plans, adopted policies and plans of local agencies, and standards set forth by responsible public agencies for the purpose of reducing emissions of greenhouse gases, as applicable and feasible. Consistent with Section 15126.4(c) of the State CEQA Guidelines, compliance can be achieved through adopting GHG mitigation measures as set forth below, or through comparable measures identified by the project sponsor agency:

- Measures in an adopted plan or mitigation program for the reduction of emissions that are required as part of the project sponsor agency's decision.
- Reduction in emissions resulting from a project through implementation of project features, project design, or other measures, such as those described in Appendix F of the State CEQA Guidelines.

- Off-site measures to mitigate a project’s emissions.
- Measures that consider incorporation of Best Available Control Technology (BACT) during design, construction, and operation of projects to minimize GHG emissions, including but not limited to:
  - Use energy and fuel efficient vehicles and equipment;
  - Deployment of zero- and/or near zero emission technologies;
  - Use lighting systems that are energy efficient, such as LED technology
  - Use the minimum feasible amount of GHG-emitting construction materials that is feasible;
  - Use cement blended with the maximum feasible amount of flash or other materials that reduce GHG emissions from cement production;
  - Incorporate design measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse;
  - Incorporate design measures to reduce energy consumption and increase use of renewable energy;
  - Incorporate design measures to reduce water consumption;
  - Use lighter-colored pavement where feasible;
  - Recycle construction debris to maximum extent feasible;
  - Plant shade trees in or near construction projects where feasible; and
  - Solicit bids that include concepts listed above.
- Measures that encourage transit use, carpooling, bike-share and car-share programs, active transportation, and parking strategies, including, but not limited to, transit-active transportation coordinated strategies, increased bicycle carrying capacity on transit and rail vehicles;
- Incorporating bicycle and pedestrian facilities into project designs, maintaining these facilities, and providing amenities incentivizing their use; providing adequate bicycle parking and planning for and building local bicycle projects that connect with the regional network;
- Improving transit access to rail and bus routes by incentives for construction of transit facilities within developments, and/or providing dedicated shuttle service to transit stations; and
- Adopting employer trip reduction measures to reduce employee trips such as vanpool and carpool programs, providing end-of-trip facilities, and telecommuting programs.
- Designate a percentage of parking spaces for ride-sharing vehicles or high-occupancy vehicles, and provide adequate passenger loading and unloading for those vehicles;
- Land use siting and design measures that reduce GHG emissions, including:
  - Developing on infill and brownfields sites;
  - Building high density and mixed use developments near transit;
  - Retaining on-site mature trees and vegetation, and planting new canopy trees;
  - Measures that increase vehicle efficiency, encourage use of zero and low emissions vehicles, or reduce the carbon content of fuels, including constructing or encouraging construction of electric vehicle charging stations or neighborhood electric vehicle networks, or charging for electric bicycles; and
  - Measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse.

## Section 4.14, Transportation

### Page 356

In August 2014, the Governor’s Office of Planning and Research circulated its draft changes to the State CEQA Guidelines implementing SB 743 for public comment. Revised draft guidelines were released on January 20, 2016 and November 27, 2017. In addition to new exemptions for projects that are consistent with specific plans, the draft SB 743 guidelines replace congestion based metrics, such as auto delay and level of service, with Vehicle Miles Traveled as the basis for determining significant impacts for all land use projects and most transportation projects. Capacity increasing roadway transportation projects may continue to use level of service or use vehicle miles traveled at the discretion of the lead agency, unless the guidelines provide specific exceptions. Following any revisions to The Governor’s Office of Planning and Research deems appropriate, it will submitted the draft guidelines to the Natural Resources Agency, who for commencement commenced of a formal rulemaking process on January 26, 2018. The new guidelines are expected to take effect on an “opt in” basis later this year, with mandatory statewide implementation starting on January 1, 2020.

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Table 43 Vehicle Activity and System Performance

Indicators & Measures	2015 Existing	2042 Plan	2015–2042	2042 No Project	2042 Plan
			Percentage Change with Plan		vs. No Project % Change
Total Population	726,060	1,050,218	44.65%	1,050,218	0.0%
Total VMT per Weekday (Miles, in Thousands)	17,991,590	<del>23,273,168</del> 23,082,864	<del>29.36%</del> 28.30%	22,892,656	+1.66% +0.83
Congested Lane Miles (Level of Service E and F)	340	<del>611</del> 588	<del>79.7%</del> 72.94%	732	-19.80% -19.67
Vehicle Hours of Delay	922,252	<del>961,642</del> 1,163,566	4.27% 26.17%	1,170,789	-21.75% -0.62%
<b>Other Indicators (Modeled Outcomes)</b>					
Public Transit (Daily Boardings)	22,350	<del>30,277</del> 30,154	<del>35.47%</del> 34.92%	26,263	+15.28% +14.82%
Bike+Walk (Non-Motorized)	149,103	<del>219,716</del> 220,147	<del>47.36%</del> 47.65%	208,484	+5.39% +5.59%
Single Occupancy Vehicle (SOV)	943,606	<del>1,241,033</del> 1,857,679	<del>31.52%</del> 68.26%	1,243,783	-0.22% +27.65%
High Occupancy Vehicles (HOV) 2+ per vehicle	1,305,270	<del>1,769,721</del> 2,257,847	<del>35.58%</del> 72.98%	1,730,352	+2.28 +30.48%
Per Capita Vehicle Miles Traveled (VMT) (All Trips)	24.78	<del>22.16</del> 21.98	<del>11.82%</del> 11.3%	21.8	+1.65% +0.78%

Source: SJCOG, 2018; Caltrans Highway Performance Monitoring System (HPMS) for 2015 Existing VMT, California Public Road Data 2015

As shown in Table 43, implementation of the 2018 RTP in 2042 would not reduce VMT and levels of congestion relative to existing (2015) conditions. Overall VMT levels would rise by about one-half in

2042, reflecting San Joaquin’s substantial population gains during the 25-year period. However, ~~the~~ This increase in absolute VMT would result in only a 4% 26% increase in the number of hours motorists would experience congested conditions (defined by SJCOG’s RCMP Levels of Service (LOS) grades E and F.). ~~Conversely, the~~ The number of congested lane miles measure would increase by more than 80 70 percent under the 2018 RTP/SCS compared to 2015 conditions.

Between 2015 and 2042 with implementation of the 2018 RTP/SCS, public transit boardings are projected to increase by more than one third, even though transit as a total share would remain relatively constant to baseline conditions (from 0.73% to 0.74%). The number of trips by bicycle and walking would increase by nearly 50% over baseline conditions increasing the total share of bike and walk trips from 4.87% in 2015 to 5.37% by 2042. ~~Although the~~ The number of trips by single occupancy vehicles would increase by one-third approximately 70 percent between 2015 and 2042, while the share of trips by single-occupancy vehicles is projected to decline by nearly a full percentage point. The percentage growth in high-occupancy vehicle (HOV) mode share would ~~exceed the growth~~ conversely decrease in single-occupancy vehicle trips, resulting in a HOV mode share of ~~59~~ 55.13% in 2042 from ~~exceeding~~ the 2015 baseline share of 58 52.79%. VMT per capita between 2015 and 2042 is projected to decrease by approximately ~~12~~ 11 percent.

**Page 357**

Regional Transportation Impact Fee (RTIF)

The Regional Transportation Impact Fee (RTIF) program is intended to impose a fee to provide funding for transportation and transit improvements that help mitigate the impact of new growth. New development throughout the county will be subject to the fee, which will be proportional to the impact on the regional transportation network caused by such new development. The funding derived from the RTIF program must be used in combination with other funding available to complete the needed transportation and transit improvements. The list of projects that are eligible for RTIF funding was most recently updated in 2017 by the SJCOG.

*San Joaquin County Traffic Impact Mitigation Fee*

**Page 363**

**Table 44 Congested Lane Miles Summary**

LOS	Existing (2015)		Year 2042 No Project		Year 2042 Plan	
	Lane Miles	Percent	Lane Miles	Percent	Lane Miles	Percent
C or better	18,958	96.74%	18,492	92.77%	<del>20,459</del> <u>20,470</u>	<del>94.19%</del> <u>94.33%</u>
D	298	1.52%	710	3.56%	<del>651</del> <u>642</u>	<del>3.00%</del> <u>2.96%</u>
Deficient E - F	340	1.74%	732	3.67%	<del>611</del> <u>588</u>	<del>2.81%</del> <u>2.71%</u>
<b>Total</b>	<b>19,596</b>	<b>100.00%</b>	<b>19,934</b>	<b>100.00%</b>	<del><b>21,721</b></del> <b><u>21,700</u></b>	<b>100.00%</b>

Source: SJCOG, 2018

Table 44 provides a summary of roadway lane-miles within San Joaquin County that are estimated to operate at different levels of service in the various scenarios evaluated during peak hours. As shown, the proportion of deficient roadway lane-miles (i.e., operating at LOS E or F) is anticipated to

increase, from about 1.74 percent under current conditions to ~~2.81~~ 2.71 percent under future conditions with implementation of the 2018 RTP/SCS. This result reflects the overall increase in vehicular travel and delay discussed above. Compared to the No Project Alternative, the 2018 RTP/SCS would result in 20% less congested lane miles.

## 3 Responses to Comments

The Final EIR presents the environmental information and analyses that have been prepared for the project, including comments received addressing the adequacy of the Draft EIR and responses to those comments. This section includes comments received during the circulation of the Draft Environmental Impact Report prepared for the 2018 RTP/SCS.

### 3.1 Introduction

Section 15088 of the State CEQA Guidelines requires that the lead agency evaluate comments on environmental issues received from persons and agencies that reviewed the Draft EIR and prepare a written response addressing each of the comments received. A list of agencies, organizations, and interested parties who have commented on the Draft EIR is provided below. A copy of each numbered comment letter and a lettered response to each comment are provided in Section 3.2, Response to Comments, of this chapter.

**Table 3-1 List of Commenters on the Draft EIR**

Assigned Letter No. and Commenter(s)	Date
<b>Agencies</b>	
1 Central Valley Regional Water Quality Control Board, Stephanie Tadlock, Environmental Scientist	4/20/2018
2 Sierra Club: Delta-Sierra Group, Paul Blathe, Vice Chair	4/19/2018
3 City of Manteca – City Manager Office, Tim Odgen, City Manager	4/30/2018
4 <sup>1</sup> Catholic Charities Diocese of Stockton, Yolanda Park, Program Manager; ClimatePlan, Christopher Escarcega, Regional Engagement Coordinator; Safe Routes to School Northern Partnership, Marty Martinez, Northern California Regional Policy Manager; San Joaquin County Public Health Services, Tammy Evans, Director; Public Health Advocates, Christina Peoples, Program Manager; Third City Coalition, Jasmine Leek, Director; Café Co-op, Esperanza Vielma, Executive Director/Co-Founder	4/30/2018
5 Terra Land Group; W/L Harris Properties, Martin Harris	-- <sup>2</sup>
6 <sup>3</sup> United Auburn Indian Community, Gene Whitehouse, Chairman United Auburn Indian Community, Cheryl Neider, Administrative Assistant	4/26/2018
<b>Individuals</b>	
7 Mary Meninga	4/4/2018
8 Adriana Lopez	4/4/2018
9 Mary Elizabeth	4/23/2018
10 Mary Meninga and Adriana Lopez	4/26/2018
11 Margaret Levano	4/4/2018
12 Irene Torres	4/26/2018

<sup>1</sup> Letter 4 was submitted as one comment letter from the combined organizations/commenters as listed

<sup>2</sup> The commenter submitted multiple letters on multiple dates throughout the comment period. The letters have been numbered

When responses result in a change to the Draft EIR, it is noted, and the resulting change is identified in Section 2.0, *Corrections and Additions*. In some cases, commenters on the 2018 RTP/SCS indicated they were providing comment on the Draft Program EIR; however, the substance of their letter included comments pertaining to the RTP/SCS. In cases where this occurs, the distinction is identified and the responses state so accordingly.

## 3.2 Response to Comments

### 3.2.1 Global Responses to Comments

This section provides “Global Responses” to comments raised in multiple comment letters on the DEIR. The Global Responses address comments related to general issues that are common throughout several comment letters. The intent of a Global Response is to provide a comprehensive response to an issue, so that all aspects of the issue are addressed in a coordinated, organized manner in one location. This reduces repetition of responses. When an individual comment raises an issue discussed in a global response, the response to the individual comment includes a cross reference to the appropriate global response. For example, if a comment identifies a question concerning project documents that were included in the processing of the DEIR, the response will include a statement such as, “Please see Global Response 1.” Individual responses to each comment are included in Section 3.2.2 of the FEIR.

#### Global Response No. 1

##### *Background*

A number of comments received pertained to the selection process of projects included in the RTP/SCS.

##### *Response*

SJCOG staff has met with each jurisdiction in the County, as well as the Regional Transit District, Caltrans, and the Regional Rail Commission to update and refine a baseline project list for the 2018 RTP. This includes removal of completed or substantially completed projects, adding any new future projects, or modifications to projects based on changes to scope or schedule. The 2018 RTP/SCS is based on that fiscally constrained RTP project list that is vetted through local jurisdictions, project sponsors, stakeholders, and the public. The project list is evaluated against plan-level performance measures which determine the performance of the cumulative investment strategy on the transportation system. Once the committees and the SJCOG Board have weighed in on their preference for the investment approach for the plan, SJCOG staff develops the final project list for the draft plan in conjunction with local jurisdictions’ planning and public works departments. The draft plan details total revenue assumed and planned investments; however, it is up to future calls for projects and actions by the SJCOG Board and local project sponsors to assign specific funding to specific projects. While the RTP serves as a high-level blueprint for transportation investments, it is subject to amendment as required to support delivery of future transportation projects.

## Global Response No. 2

### *Background*

A number of comments questioned how mitigation measures are enforced and funded, as well as the protocols for ensuring that mitigation measures are implemented.

### *Response*

The Draft EIR's mitigation measures meet CEQA requirements, such as those established by *State CEQA Guidelines* Section 15126.4. The proposed Regional Transportation Plan (RTP) is a fiscally constrained project list as described in Global Response No. 1. The CEQA Lead Agency (i.e., "project sponsor") for any specific project on the list will vary depending on the type of project and funding source. That project sponsor will be responsible for identifying and implementing any mitigation required by the project specific CEQA analysis conducted for that project, and/or NEPA analysis as required. SJCOG may be identified as a Responsible Agency for a given project, which provides limited authority to mitigate:

#### 15041. AUTHORITY TO MITIGATE

Within the limitations described in Section 15040:

- (b) When a public agency acts as a Responsible Agency for a project, the agency shall have more limited mitigation authority than a Lead Agency. The Responsible Agency may require changes in a project to lessen or avoid only the effects, either direct or indirect, of that part of the project which the agency will be called on to carry out or approve.

The proposed 2018 Sustainable Communities Strategy (SCS) does not authorize or provide entitlements to development or construction projects in the SJCOG region. Rather, the proposed 2018 SCS is a regional strategy that sets a vision for future development; individual development projects must still be reviewed, analyzed, and approved by local governments consistent with their local land use plans. The local governments retain full control over local land use authority, pursuant to Government Code 65080(b)(2)(K).

As described on pages 67 and 68 of the DEIR, the DEIR includes proposed mitigation measures to reduce impacts and identifies agencies for implementation of those mitigation measures. SJCOG has lead agency status; and therefore, authority to enforce mitigation measures for projects for which they have discretionary authority. However, SJCOG does not have authority to require recommended mitigation measures be implemented by other agencies that would be lead agencies for future land use development or transportation projects. It is the responsibility of the lead agency implementing specific 2018 RTP/SCS projects to conduct environmental review consistent with CEQA, and where applicable, incorporate mitigation measures provided in the DEIR/FEIR. Project-specific environmental documents may adjust the mitigation measures identified in this FEIR as necessary to respond to site-specific conditions. SJCOG is required to identify mitigation for the RTP/SCS, but implementation of the mitigation is at the discretion of the lead agency at a project-level environmental review. SJCOG has and will work consistently with all of its member agencies to ensure that transportation projects funded through the RTP are implementing, as appropriate, mitigation measures identified in the DEIR.

## Global Response No. 3

### *Background*

A number of comments were received pertaining to project specific impacts, subsequent environmental review processes, and specific mitigation measures that should be included for individual projects.

### *Response*

This comment pertains to the potential impacts of specific projects included in the 2018 RTP/SCS project lists. As described on page 37 of the DEIR, the analysis presents a programmatic assessment of the potential impacts of the proposed 2018 RTP/SCS, focusing on the entire set of projects and programs contained in the proposed 2018 RTP/SCS. Individual transportation project impacts are not addressed in detail; rather the focus of the DEIR is on the entire programmatic nature of projects, in the aggregate.

Section 15168 of the State CEQA Guidelines defines a programmatic EIR as an EIR that addresses “a series of actions that can be characterized as one large project and are related either:

- (1) Geographically;
- (2) As logical parts in the chain on contemplated actions;
- (3) In connection with the issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program; or
- (4) As individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental impacts which can be mitigated in similar ways.”

The proposed 2018 RTP/SCS is a long-term, regional-scale plan covering the entire area of San Joaquin County through 2042. Accordingly, the DEIR analyzes the proposed 2018 RTP/SCS at a programmatic level, as described on page 37 of the DEIR.

Programmatic EIRs, such as this DEIR, is an example of the process of “tiering.” Section 15385 of the *State CEQA Guidelines* defines tiering as “coverage of general matters in broader EIRs (such as on general plans or policy statements) with subsequent narrower EIRs or ultimately site-specific EIRs incorporating by reference the general discussions and concentrating solely on the issues specific to the EIR subsequently prepared...” In addressing the appropriate amount of detail required at different stages in the tiering process, the *State CEQA Guidelines* state that “[w]here a lead agency is using the tiering process in connection with an EIR for a large-scale planning approval, such as a general plan or component thereof..., the development of detailed, site-specific information may not be feasible but can be deferred, in many instances, until such time as the lead agency prepares a future environmental document in connection with a project of a more limited geographic scale, as long as deferral does not prevent adequate identification of significant effects of the planning approval at hand” (*State CEQA Guidelines* Section 15152(c)).

As explained by the Supreme Court, “[t]iering is properly used to defer analysis of environmental impacts and mitigation measures to later phases when the impacts or mitigation measures are not determined by the first-tier approval decision but are specific to the later phases.” *In re Bay-Delta* (2008) 43 Cal.4th 1143, 1169-1170. “Under CEQA’s tiering principles, it is proper for a lead agency to use its discretion to focus a first-tier EIR on only the general plan or program, leaving project-level details to subsequent EIR’s when specific projects are being considered.” *Id.*, at 1174-1175.

Consistent with these provisions of CEQA, the DEIR does not evaluate project-specific impacts of individual project components. Under *State CEQA Guidelines* Section 15168, implementing agencies are required to determine whether project-specific impacts require additional analysis in subsequent second-tier CEQA documents, as described in Section 1.3.1, *CEQA Streamlining Opportunities*, and Section 2.5, *Intended Use of EIR*, of the DEIR. Therefore, the project-level impacts, such as noise and flooding, would be evaluated in a future project-level environmental review. The inclusion of projects in the 2018 RTP/SCS does not necessarily mean that the projects would be approved and implemented. Approval of a particular project will depend on the project-level analysis, findings, and if applicable, a statement of overriding considerations.

## Global Response No. 4

### *Background*

A number of comments were received pertaining to stormwater flows and flooding, mainly concern related to development in the floodplain and the need to examine any potential impacts related to San Joaquin River (and tributary) flow deficiencies and the potential for upstream and downstream channel flow stage increases due to drainage patterns affected by grade, levee location, and other environmental considerations.

Impacts relating to the creation of stormwater runoff and flooding are discussed in Section 4.11, *Hydrology and Water Quality*. As discussed in Impacts W-1 and W-3, mitigation measures pertaining to increased run off capture, the development of hydrologic studies, and guidelines for development in identified flood hazard areas, which, if implemented by project sponsor agencies, would reduce impacts to a less than significant level. Specifically pertaining to floodplain development, individual project sponsors are required by state and federal regulations to obtain necessary approvals for construction within designated floodplains.

In addition, the Sustainable Communities Strategy (SCS) does not authorize or provide entitlement to development or construction projects in the SJCOG region as described in Global Response 2. Therefore, the SCS does not approve, authorize, or fund land use development that could impact flooding and flood flows in San Joaquin County. The proposed Regional Transportation Plan (RTP) is a fiscally constrained project list as described in Global Response No. 1. The RTP does not approve or authorize construction of any projects. As described in Global Response 3, the environmental review is a programmatic review focusing on the entire set of projects and programs contained in the proposed 2018 RTP and not impacts from individual projects. Approval of a particular project will depend on the project-level analysis, findings, and if applicable, a statement of overriding considerations for any impacts relating to flooding or floodplain impacts.

### 3.2.2 Individual Responses to Comments

The individual comments from letters received on the Draft EIR are addressed in their entirety in this section. Each comment contained in each letter has been assigned a reference code. The responses to comments correlate to the reference code in each letter.



Letter 1



RECEIVED  
APR 25 2018

Central Valley Regional Water Quality Control Board

20 April 2018

San Joaquin  
Council of Governments

Kim Anderson  
San Joaquin Council of Governments  
555 East Weber Avenue  
Stockton, CA 95202

CERTIFIED MAIL  
91 7199 9991 7036 6990 3698

**COMMENTS TO REQUEST FOR REVIEW FOR THE DRAFT ENVIRONMENTAL IMPACT REPORT, SJCOG 2018 REGIONAL TRANSPORTATION PLAN (INCLUDING A SUSTAINABILITY STRATEGY) PROGRAM EIR PROJECT, SCH# 2017032042, SAN JOAQUIN COUNTY**

Pursuant to the State Clearinghouse's 14 March 2018 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Request for Review for the Draft Environment Impact Report* for the SJCOG 2018 Regional Transportation Plan (Including a Sustainability Strategy) Program EIR Project, located in San Joaquin County.

Our agency is delegated with the responsibility of protecting the quality of surface and groundwaters of the state; therefore our comments will address concerns surrounding those issues.

**I. Regulatory Setting**

**Basin Plan**

The Central Valley Water Board is required to formulate and adopt Basin Plans for all areas within the Central Valley region under Section 13240 of the Porter-Cologne Water Quality Control Act. Each Basin Plan must contain water quality objectives to ensure the reasonable protection of beneficial uses, as well as a program of implementation for achieving water quality objectives with the Basin Plans. Federal regulations require each state to adopt water quality standards to protect the public health or welfare, enhance the quality of water and serve the purposes of the Clean Water Act. In California, the beneficial uses, water quality objectives, and the Antidegradation Policy are the State's water quality standards. Water quality standards are also contained in the National Toxics Rule, 40 CFR Section 131.36, and the California Toxics Rule, 40 CFR Section 131.38.

The Basin Plan is subject to modification as necessary, considering applicable laws, policies, technologies, water quality conditions and priorities. The original Basin Plans were adopted in 1975, and have been updated and revised periodically as required, using Basin Plan amendments. Once the Central Valley Water Board has adopted a Basin Plan amendment in noticed public hearings, it must be approved by the State Water Resources

1

Control Board (State Water Board), Office of Administrative Law (OAL) and in some cases, the United States Environmental Protection Agency (USEPA). Basin Plan amendments only become effective after they have been approved by the OAL and in some cases, the USEPA. Every three (3) years, a review of the Basin Plan is completed that assesses the appropriateness of existing standards and evaluates and prioritizes Basin Planning issues.

For more information on the *Water Quality Control Plan for the Sacramento and San Joaquin River Basins*, please visit our website:  
[http://www.waterboards.ca.gov/centralvalley/water\\_issues/basin\\_plans/](http://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/).

### **Antidegradation Considerations**

All wastewater discharges must comply with the Antidegradation Policy (State Water Board Resolution 68-16) and the Antidegradation Implementation Policy contained in the Basin Plan. The Antidegradation Policy is available on page IV-15.01 at:  
[http://www.waterboards.ca.gov/centralvalleywater\\_issues/basin\\_plans/sacsjr.pdf](http://www.waterboards.ca.gov/centralvalleywater_issues/basin_plans/sacsjr.pdf)

In part it states:

*Any discharge of waste to high quality waters must apply best practicable treatment or control not only to prevent a condition of pollution or nuisance from occurring, but also to maintain the highest water quality possible consistent with the maximum benefit to the people of the State.*

*This information must be presented as an analysis of the impacts and potential impacts of the discharge on water quality, as measured by background concentrations and applicable water quality objectives.*

The antidegradation analysis is a mandatory element in the National Pollutant Discharge Elimination System and land discharge Waste Discharge Requirements (WDRs) permitting processes. The environmental review document should evaluate potential impacts to both surface and groundwater quality.

## **II. Permitting Requirements**

### **Construction Storm Water General Permit**

Dischargers whose project disturb one or more acres of soil or where projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction Activities (Construction General Permit), Construction General Permit Order No. 2009-009-DWQ. Construction activity subject to this permit includes clearing, grading, grubbing, disturbances to the ground, such as stockpiling, or excavation, but does not include regular maintenance activities performed to

1 Cont.

restore the original line, grade, or capacity of the facility. The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP).

For more information on the Construction General Permit, visit the State Water Resources Control Board website at:  
[http://www.waterboards.ca.gov/water\\_issues/programs/stormwater/constpermits.shtml](http://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml).

**Phase I and II Municipal Separate Storm Sewer System (MS4) Permits<sup>1</sup>**

The Phase I and II MS4 permits require the Permittees reduce pollutants and runoff flows from new development and redevelopment using Best Management Practices (BMPs) to the maximum extent practicable (MEP). MS4 Permittees have their own development standards, also known as Low Impact Development (LID)/post-construction standards that include a hydromodification component. The MS4 permits also require specific design concepts for LID/post-construction BMPs in the early stages of a project during the entitlement and CEQA process and the development plan review process.

1 Cont.

For more information on which Phase I MS4 Permit this project applies to, visit the Central Valley Water Board website at:  
[http://www.waterboards.ca.gov/centralvalley/water\\_issues/storm\\_water/municipal\\_permits/](http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/municipal_permits/).

For more information on the Phase II MS4 permit and who it applies to, visit the State Water Resources Control Board at:  
[http://www.waterboards.ca.gov/water\\_issues/programs/stormwater/phase\\_ii\\_municipal.shtml](http://www.waterboards.ca.gov/water_issues/programs/stormwater/phase_ii_municipal.shtml)

**Industrial Storm Water General Permit**

Storm water discharges associated with industrial sites must comply with the regulations contained in the Industrial Storm Water General Permit Order No. 2014-0057-DWQ.

For more information on the Industrial Storm Water General Permit, visit the Central Valley Water Board website at:  
[http://www.waterboards.ca.gov/centralvalley/water\\_issues/storm\\_water/industrial\\_general\\_permits/index.shtml](http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/industrial_general_permits/index.shtml).

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<sup>1</sup> Municipal Permits = The Phase I Municipal Separate Storm Water System (MS4) Permit covers medium sized Municipalities (serving between 100,000 and 250,000 people) and large sized municipalities (serving over 250,000 people). The Phase II MS4 provides coverage for small municipalities, including non-traditional Small MS4s, which include military bases, public campuses, prisons and hospitals.

**Clean Water Act Section 404 Permit**

If the project will involve the discharge of dredged or fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be needed from the United States Army Corps of Engineers (USACOE). If a Section 404 permit is required by the USACOE, the Central Valley Water Board will review the permit application to ensure that discharge will not violate water quality standards. If the project requires surface water drainage realignment, the applicant is advised to contact the Department of Fish and Game for information on Streambed Alteration Permit requirements.

If you have any questions regarding the Clean Water Act Section 404 permits, please contact the Regulatory Division of the Sacramento District of USACOE at (916) 557-5250.

**Clean Water Act Section 401 Permit – Water Quality Certification**

If an USACOE permit (e.g., Non-Reporting Nationwide Permit, Nationwide Permit, Letter of Permission, Individual Permit, Regional General Permit, Programmatic General Permit), or any other federal permit (e.g., Section 10 of the Rivers and Harbors Act or Section 9 from the United States Coast Guard), is required for this project due to the disturbance of waters of the United States (such as streams and wetlands), then a Water Quality Certification must be obtained from the Central Valley Water Board prior to initiation of project activities. There are no waivers for 401 Water Quality Certifications.

**Waste Discharge Requirements – Discharges to Waters of the State**

If USACOE determines that only non-jurisdictional waters of the State (i.e., “non-federal” waters of the State) are present in the proposed project area, the proposed project may require a Waste Discharge Requirement (WDR) permit to be issued by Central Valley Water Board. Under the California Porter-Cologne Water Quality Control Act, discharges to all waters of the State, including all wetlands and other waters of the State including, but not limited to, isolated wetlands, are subject to State regulation.

For more information on the Water Quality Certification and WDR processes, visit the Central Valley Water Board website at:

[http://www.waterboards.ca.gov/centralvalley/help/business\\_help/permit2.shtml](http://www.waterboards.ca.gov/centralvalley/help/business_help/permit2.shtml).

**Dewatering Permit**

If the proposed project includes construction or groundwater dewatering to be discharged to land, the proponent may apply for coverage under State Water Board General Water Quality Order (Low Risk General Order) 2003-0003 or the Central Valley Water Board’s Waiver of Report of Waste Discharge and Waste Discharge Requirements (Low Risk Waiver)

R5-2013-0145. Small temporary construction dewatering projects are projects that discharge groundwater to land from excavation activities or dewatering of underground utility vaults. Dischargers seeking coverage under the General Order or Waiver must file a Notice of Intent with the Central Valley Water Board prior to beginning discharge.

1 Cont

For more information regarding the Low Risk General Order and the application process, visit the Central Valley Water Board website at:

[http://www.waterboards.ca.gov/board\\_decisions/adopted\\_orders/water\\_quality/2003/wqo/wqo2003-0003.pdf](http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2003/wqo/wqo2003-0003.pdf)

For more information regarding the Low Risk Waiver and the application process, visit the Central Valley Water Board website at:

[http://www.waterboards.ca.gov/centralvalley/board\\_decisions/adopted\\_orders/waivers/r5-2013-0145\\_res.pdf](http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/waivers/r5-2013-0145_res.pdf)

### **Regulatory Compliance for Commercially Irrigated Agriculture**

If the property will be used for commercial irrigated agricultural, the discharger will be required to obtain regulatory coverage under the Irrigated Lands Regulatory Program. There are two options to comply:

1. **Obtain Coverage Under a Coalition Group.** Join the local Coalition Group that supports land owners with the implementation of the Irrigated Lands Regulatory Program. The Coalition Group conducts water quality monitoring and reporting to the Central Valley Water Board on behalf of its growers. The Coalition Groups charge an annual membership fee, which varies by Coalition Group. To find the Coalition Group in your area, visit the Central Valley Water Board's website at: [http://www.waterboards.ca.gov/centralvalley/water\\_issues/irrigated\\_lands/for\\_growers/apply\\_coalition\\_group/index.shtml](http://www.waterboards.ca.gov/centralvalley/water_issues/irrigated_lands/for_growers/apply_coalition_group/index.shtml) or contact water board staff at (916) 464-4611 or via email at [IrrLands@waterboards.ca.gov](mailto:IrrLands@waterboards.ca.gov).
2. **Obtain Coverage Under the General Waste Discharge Requirements for Individual Growers, General Order R5-2013-0100.** Dischargers not participating in a third-party group (Coalition) are regulated individually. Depending on the specific site conditions, growers may be required to monitor runoff from their property, install monitoring wells, and submit a notice of intent, farm plan, and other action plans regarding their actions to comply with their General Order. Yearly costs would include State administrative fees (for example, annual fees for farm sizes from 10-100 acres are currently \$1,084 + \$6.70/Acre); the cost to prepare annual monitoring reports; and water quality monitoring costs. To enroll as an Individual Discharger under the Irrigated Lands Regulatory Program, call the Central Valley Water Board phone line at (916) 464-4611 or e-mail board staff at [IrrLands@waterboards.ca.gov](mailto:IrrLands@waterboards.ca.gov).

1 Cont.

### **Low or Limited Threat General NPDES Permit**

If the proposed project includes construction dewatering and it is necessary to discharge the groundwater to waters of the United States, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. Dewatering discharges are typically considered a low or limited threat to water quality and may be covered under the General Order for *Dewatering and Other Low Threat Discharges to Surface Waters* (Low Threat General Order) or the General Order for *Limited Threat Discharges of Treated/Untreated Groundwater from Cleanup Sites, Wastewater from Superchlorination Projects, and Other Limited Threat Wastewaters to Surface Water* (Limited Threat General Order). A complete application must be submitted to the Central Valley Water Board to obtain coverage under these General NPDES permits.

For more information regarding the Low Threat General Order and the application process, visit the Central Valley Water Board website at:

[http://www.waterboards.ca.gov/centralvalley/board\\_decisions/adopted\\_orders/general\\_orders/r5-2013-0074.pdf](http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2013-0074.pdf)

For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at:

[http://www.waterboards.ca.gov/centralvalley/board\\_decisions/adopted\\_orders/general\\_orders/r5-2013-0073.pdf](http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2013-0073.pdf)

### **NPDES Permit**

If the proposed project discharges waste that could affect the quality of surface waters of the State, other than into a community sewer system, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. A complete Report of Waste Discharge must be submitted with the Central Valley Water Board to obtain a NPDES Permit.

For more information regarding the NPDES Permit and the application process, visit the Central Valley Water Board website at:

[http://www.waterboards.ca.gov/centralvalley/help/business\\_help/permit3.shtml](http://www.waterboards.ca.gov/centralvalley/help/business_help/permit3.shtml)

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If you have questions regarding these comments, please contact me at (916) 464-4644 or  
Stephanie.Tadlock@waterboards.ca.gov.



Stephanie Tadlock  
Environmental Scientist



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cc: State Clearinghouse unit, Governor's Office of Planning and Research, Sacramento

## Letter 1

**COMMENTER:** Central Valley Regional Water Quality Control Board, Stephanie Tadlock,  
Environmental Scientist

**DATE:** April 20, 2018

### Response 1.1

The commenter correctly states that the Central Valley Regional Water Quality Control Board is the agency delegated with the responsibility of protecting the quality of surface and groundwater of the state, and summarizes the Board's responsibility to formulate and adopt Basin Plans. In addition, the commenter summarizes the regulatory requirements pertaining to stormwater discharges, Clean Water Act (404 and 401) permits, dewatering, NPDES requirements, and the Irrigated Lands Regulatory Program.

Regulatory setting information regarding water quality is included in Section 4.11, *Hydrology and Water Quality*. As discussed in Section 4.11, the 2018 RTP/SCS is subject to all federal, state, and local laws which intend to protect waters of the state. The individual transportation improvement projects included in the 2018 RTP/SCS are required to adhere to all permitting processes set by the Regional Water Quality Control Board.



SIERRA  
CLUB  
FOUNDED 1892

Delta-Sierra Group  
Mother Lode Chapter  
P.O. Box 9258, Stockton CA 95208

Letter 2

Attn; Kim Anderson, Senior Regional Planner  
San Joaquin Council of Governments  
555 East Weber Avenue  
Stockton, CA 95202  
Contact Email: anderson@sjcog.org  
Public Comment Email: sjcog.rtp@gmail.com

Comment to the draft of the San Joaquin Council of Governments  
2018 Regional Transportation Plan/Sustainable Communities Strategy

We see no effort on our mainline roads to take advantage of congestion pricing.  
We believe that congestion pricing will benefit residents of San Joaquin County.  
Three environmental benefits of congestion pricing are;

1. Will cut tailpipe emissions of carbon dioxide, the main greenhouse gas,.
2. Fewer auto trips from the toll disincentive along with transit improvements funded by toll revenues.
3. Smoothed traffic flow, as the lessening in stop-and-go traffic translates into better fuel economy and, thus, lower per-mile emissions.

We believe that planning for congestion pricing on our mainline roads needs to be included in the 2018 Regional Transportation Plan/Sustainable Communities Strategy.

Paul Plathe

Vice Chair  
Delta-Sierra Group of the Sierra Club

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## Letter 2

**COMMENTER:** Sierra Club – Delta-Sierra Group, Paul Plathe, Vice Chair

**DATE:** April 19, 2018

### Response 2.1

The commenter states that San Joaquin County should utilize congestion pricing, as it would provide environmental benefits, and that congestion pricing on mainline roads should be included in the 2018 RTP/SCS.

See Global Response 1. In order to implement congestion pricing it would need to be identified as a project and compete with other projects as explained in Global Response 1. A further response to this letter is included in the RTP's Section D. *Response to Comments*. It is reprinted below.

RTP Section D. *Response to Comments*, Letter B-3 Response:

“Response B-3.1: Federal law prohibits the tolling of existing lanes on interstate highways (23. USC § 129 (a)(1)(F)). However, the addition of new toll lanes or conversion of high-occupancy vehicle lanes to toll lanes is permitted. SJCOG agrees the provision of managed lanes should be considered for all mainline highway projects in the 2018 RTP/SCS and recognizes the potential benefits to air quality that this strategy offers. During the project-level environmental analysis for each mainline project identified in the 2018 RTP, SJCOG and Caltrans, as appropriate, will examine high-occupancy vehicle lane and highoccupancy toll lane configurations for consideration as project alternatives.

Additionally, federal and state law requires that any capacity-increasing projects must also consider the use of reversible lanes to minimize project cost, right-of-way take, and environmental impact.”



# CITY OF MANTECA

CITY MANAGER OFFICE

April 30, 2018

Kim Anderson, Senior Regional Planner  
San Joaquin Council of Governments  
555 E. Weber Avenue  
Stockton, CA 95202

Dear Ms. Anderson,

Thank you for the presentations to the Planning Commission and City Council regarding the 2018 Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS). The City of Manteca appreciates the time and effort put forth by the San Joaquin Council of Governments (SJCOG) in developing the RTP/SCS, especially the public education and outreach effort to Manteca residents.

The City of Manteca is very pleased to see SJCOG's commitment to sustainable growth demonstrated by the RTP/SCS. Manteca is taking proactive steps to become a sustainable growth partner with SJCOG by directly implementing important RTP/SCS strategies. One of the steps that Manteca is taking is working towards Transit Oriented Developments (TOD) around the two stations identified by ACE in their Lathrop to Ceres Environmental Impact Report.

The first station, the existing Manteca Transit Center on Moffat Blvd, is identified by ACE as a station within the Ceres to Lathrop project EIR. The City desires to have a TOD community along Moffat Blvd and Grant Avenue. The second station, the relocated Manteca/Lathrop station, a planned station to replace the existing Lathrop/Manteca station, is identified on a site west of McKinley Avenue, north of the planned McKinley Avenue Interchange. This relocated station is identified by both the ACE *forward* and Ceres to Lathrop project EIR. At both locations, Manteca envisions partnering with local affordable home builders to create a true TOD community, centered on the ACE station much like the community around the BART Fruitvale station.

By proactively seeking out affordable home builders for the sites around these two identified ACE stations, it is Manteca's intent to directly implement the following RTP/SCS strategies:

- Strategy #5: Optimize Public Transportation System to Provide Efficient and Convenient Access for Users at All Income Levels.
- Strategy #6: Facilitate Transit-Oriented Development to Maximize Existing Transit Investments.

- Strategy #12: Optimize Existing Transportation System Capacity through Available and/or Innovative Strategies.
- Strategy #14: Encourage System Efficiency with Transportation Improvements that Facilitate Great Jobs/Housing Balance.
- Strategy #25: Encourage Transportation Investments that Support a Greater Mix of Housing Options at All Income Levels.



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To make the vision of a TOD around ACE stations a reality, the effort will require coordination amongst local, state and federal agencies. So that all of our local plans: City, SJCOG, ACE, and Tri-Valley Rail Authority collectively, are consistent with one another, Manteca suggests some minor modifications to the RTP/SCS. Although the 2018 RTP/SCS Highlighted Projects Map for Lathrop and Manteca identifies the construction of additional parking and a platform for passenger rail service at the Manteca Transit Center, item “EE”, it does not include the proposed relocated Lathrop/Manteca Station.

There are a wide array of reasons why the relocated Manteca/Lathrop station should be identified within the SCS/RTP. The relocated station will increase regional accessibility by being adjacent to the planned McKinley Avenue/State Route 120 interchange. There will be complementary land uses that support the regional accessibility with the anticipated 500,000 annual tourists that will be generated by the approved Great Wolf Lodge Project in the Family Entertainment Zone, coupled with the 400,000 annual visitors to Big League Dreams. We believe the relocation of the Lathrop/Manteca station to just north of the new McKinley interchange will better serve the region, reducing both commuter and tourism traffic on our highways.

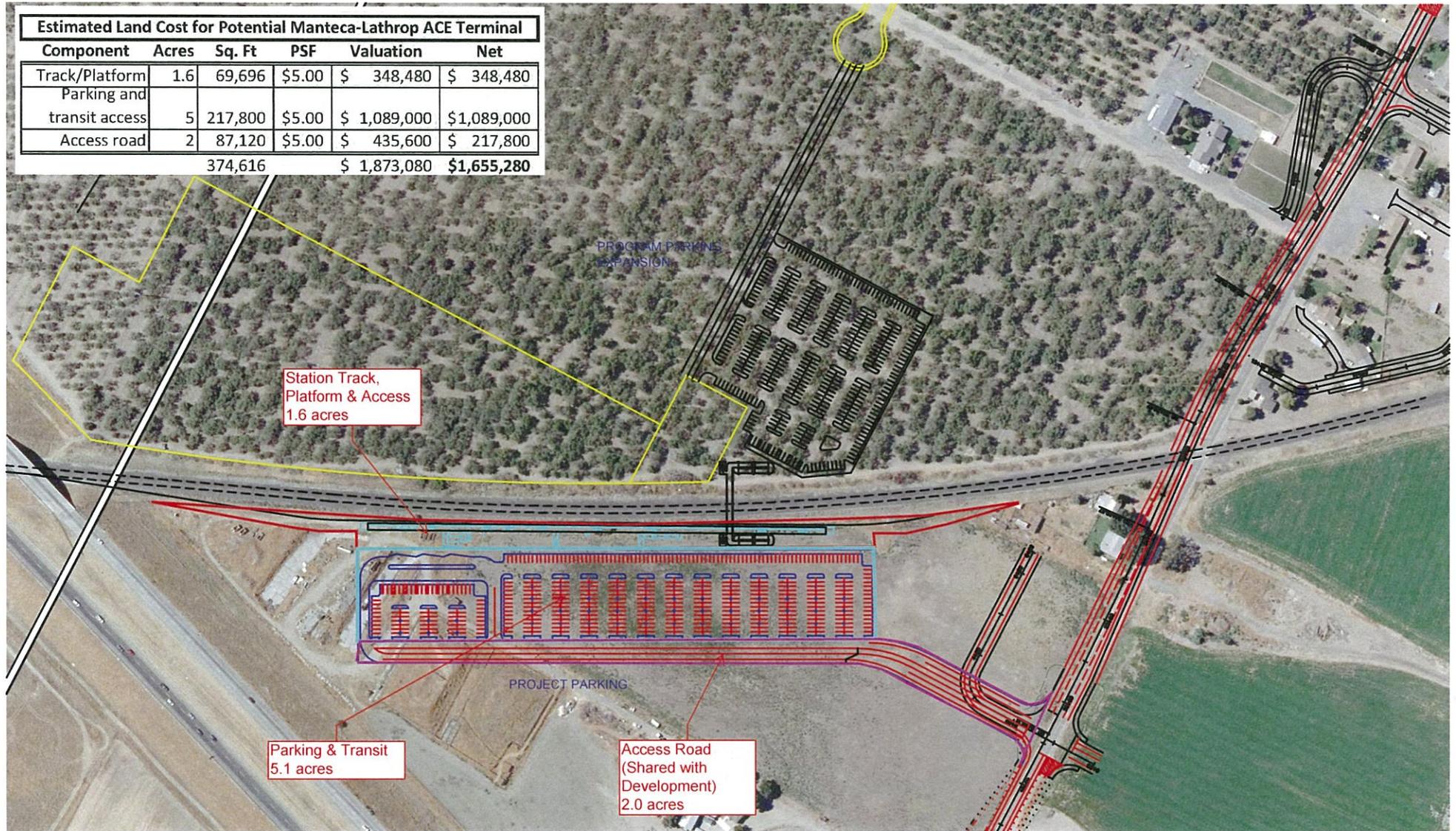
In addition to regional accessibility to the public transportation investment, by integrating affordable housing with future transportation improvements, showing the relocated Manteca/Lathrop station within the RTP will demonstrate the plan’s goal of ensuring social equity. For these reasons, the City of Manteca asks you to consider including this station in the 2018 RTP/SCS Highlighted Projects Map.

The City of Manteca looks forward to working with SJCOG in implementing the RTP/SCS and supports the overall principles and strategies detailed in the plan.

Cordially,

Tim Ogden  
City Manager

Estimated Land Cost for Potential Manteca-Lathrop ACE Terminal					
Component	Acres	Sq. Ft	PSF	Valuation	Net
Track/Platform	1.6	69,696	\$5.00	\$ 348,480	\$ 348,480
Parking and transit access	5	217,800	\$5.00	\$ 1,089,000	\$1,089,000
Access road	2	87,120	\$5.00	\$ 435,600	\$ 217,800
	374,616			\$ 1,873,080	\$1,655,280



\$DATE \$TIME \$DISPENSED \$SUBMIT

REV	DATE	BY	CHK	APP	DESCRIPTION

DESIGNED BY  
 DRAWN BY  
 CHECKED BY  
 IN CHARGE  
 DATE

TRANSPORTATION  
**AECOM**  
 AECOM USA, Inc.  
 1333 Broadway, Suite 800  
 Oakland, CA 94612  
 T 510.893.3600 F 510.874.3268  
 www.aecom.com



**SAN JOAQUIN REGIONAL RAIL COMMISSION**  
**ALTAMONT CORRIDOR EXPRESS**  
**ACEforward ALIGNMENT**  
 Relocated Lathrop/Manteca Station  
 Project and Program - 10 to Stockton

CONTRACT NO.	
DRAWING NO.	
SCALE	
SHEET NO.	OF

# Proposed Alignment & Station

3/12/2018



## Letter 3

**COMMENTER:** City of Manteca, Tim Ogden, City Manager

**DATE:** April 30, 2018

### Response 3.1

The commenter states that the 2018 RTP/SCS project list should include the proposed relocated Lathrop/Manteca Station project.

The process of including projects into the RTP is discussed in Global Response 1. Should SJCOG include the project, the environmental impacts of the project would be assessed at a programmatic level, as discussed in Global Response 3. A further response to this letter is included in the RTP's Section D. *Response to Comments*. It is reprinted below.

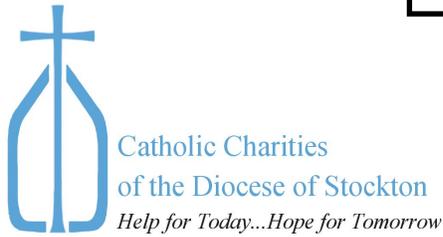
RTP Section D. *Response to Comments*, Letter A-3 Response:

"SJCOG recognizes the existing Manteca Transit Center on Moffat Blvd and its inclusion in the ACE Ceres to Lathrop Environmental Impact Report (EIR). Improvements to this station as identified by the San Joaquin Regional Rail Commission (SJRRRC) are included in the 2018 RTP/SCS fiscally constrained project list in Table 6-6 of Appendix F of the 2018 RTP/SCS.

SJCOG has met with ACE staff ahead of RTP project list development, following the adoption of Senate Bill 132 (which awarded \$400M for ACE expansion to Merced County), and recently following the award of Transit and Intercity Rail Capital Program funds (\$500.5M for ACE and Amtrak service to Sacramento), to ensure that ACE's expansion is accurately captured in the 2018 RTP/SCS. Through these discussions, ACE has yet to commit funds to relocating the Lathrop/Manteca station to a McKinley Avenue location. We note that the relocation of the transit station is not currently reflected in either Manteca's or SJRRRC's short range transit plans. As such, SJCOG has not included these station improvements in the Tier 1 fiscally constrained project list or the Highlighted Projects Map, as they cannot currently be reasonably considered fiscally constrained.

SJCOG has added the project to the Candidate Project List (2018 RTP/SCS, Appendix U), and intends to continue discussions with both City of Manteca and ACE. As planning and funding for the project becomes better defined, it may be added as appropriate to the Tier 1 fiscally constrained project list via an amendment to the 2018 RTP/SCS or in a future update of the plan. The relocated station project has not been added to the Highlighted Projects mapping as these maps only reflect projects in the Tier 1 fiscally constrained project list or those otherwise fully funded."

Letter 4



Andrew T. Chesley, Executive Director  
San Joaquin Council of Governments  
555 E Weber Avenue  
Stockton, CA 95202-2804

30 April 2018

**RE: Comments on the 2018 SJCOG Regional Transportation Plan / Sustainable Communities Strategy Draft Plan Update**

Dear Mr. Chesley:

On behalf of the undersigned organizations, thank you for this opportunity to comment on the 2018 SJCOG Regional Transportation Plan / Sustainable Communities Strategy draft update. We appreciate the work that San Joaquin COG staff, committees, and Council members have invested in this draft plan.

In particular, we'd like to acknowledge the outreach efforts that were coordinated with local organizations to reach out to underserved low-income communities and communities of color. In ClimatePlan's report, "Leading the Way: Policies and Practices for Sustainable Communities Strategies,"<sup>1</sup> we noted the importance of partnering with local organizations to increase



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<sup>1</sup> ["Leading the Way: Policies and Practices for Sustainable Communities"](#). ClimatePlan. 2016.

community engagement and participation in this process. We are appreciative to see SJCOG replicate this best practice and hope this type of coordination continues in the future.

Our organizations believe that land use and transportation planning must be well-aligned to achieve positive outcomes for San Joaquin communities, including: cleaner air; improved public health; economic vitality; safe and affordable access to schools, jobs, and services; housing and transportation choices; preservation of working lands and wildlands; and social equity. To that end, we are committed to supporting ambitious and achievable round two implementation of SB 375.

### ***Performance Indicators and Strategies***

#### ***Improve Air Quality and Reduce Greenhouse Gases***

The 2018 draft RTP/SCS plan performance measures summary indicates expected GHG per capita reductions of -17.60% (2035) and -7.00% (2020), exceeding round two targets for SJCOG (5% under 2005 baseline by 2020 and 10% under 2005 baseline by 2035). We are encouraged to see such ambitious GHG reduction emissions from SJCOG, which also exceed the round three targets, and commend staff for their hard work on this plan. However, we are concerned that the vehicle miles traveled (VMT) per capita metric, used as a proxy for emissions reductions, moves only 0.007 from 2042 business-as-usual scenario. We would like to see stronger VMT reductions that better align with the plan's GHG reduction emissions or better transparency to understand why the VMT decline is smaller than the GHG reduction emissions. To achieve this goal, we recommend either:

- Substantially increasing VMT reductions by prioritizing emission reduction strategies, including increased funding for transit and active transportation, prioritization of infill development, or
- Include a narrative that explains how the transportation and land use model anticipates the VMT/GHG reduction emissions relationship. This narrative should also clarify the relationship between VMT/GHG reduction emissions and include projected change over time due to electrification, increased fuel economy, and other factors.

#### ***Building in existing communities and protecting farmland***

The San Joaquin valley is home to some of the most productive farmland on Earth, and farming remains a significant economic sector as well as a cultural identity for the county and its communities. Prime farmland and critically important wildlands can and should be protected through careful, deliberate infill development and economic development within existing communities. Infill development will allow for population growth and stimulate economic activity in town and city cores, while guarding against unnecessary (and expensive) build-out of taxpayer-funded municipal infrastructure outside of the existing urban footprint. We recommend that 2018 RTP/SCS land growth forecast direct all new growth to occur as infill development or within established urban growth boundaries. Additionally, we suggest developing or adopting

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conservation-related criteria into highway project prioritization scoring.<sup>2</sup>

↑3 Cont.

*Tracking Health and Wellness indicators*

We strongly support SJCOG’s pilot program to track health and Wellness indicators, including weekly total walking minutes per person, daily total recreational physical activity minutes per person, average body mass index, and general poor health (as self-reported via the California Health Interview Survey). We believe this pilot program builds upon SJCOG’s work with public health leaders in the 2014 plan development process, as well as the active role that SJCOG took in regards to the Community Health Assessment and Community Health Improvement Program. We are excited to see SJCOG continue to lead in its incorporation of public health into the RTP. We recommend the inclusion of the following metrics to further elevate public health:

- “Healthy Neighborhood” index of park access, tree canopy, supermarket access, distance from liquor stores, and retail access<sup>3</sup>
- “Clean environment” index of diesel PM emissions, water contamination, ozone, and PM 2.51 (*ibid.*)

We also recommend that these health and Wellness indicators inform transportation project selection. To achieve the goals of SB 375—and create healthier communities—it is essential that these indicators inform the prioritization of transportation projects. We recommend the transportation projects with the highest health benefits (as scored by these indicators) should be elevated and funded before other projects, that may exacerbate public health issues.

4

*Ensure the strategies to achieve GHG reduction targets maximize social equity*

Low-income communities and communities of color have contended with a long history of transportation and land use policies that have created gaps in opportunity and institutionalized discriminatory practices. Without explicit strategies to promote and safeguard equity, there is real risk of exacerbating inequalities, including displacement along transit corridors and in city centers and nearby neighborhoods. Already, San Joaquin county is home to significant numbers long-distance commuters that work in the San Francisco Bay Area<sup>4</sup>; as housing costs rise in the nine counties that compose that region the megaregion (including San Joaquin county) can expect an influx of new residents. Displacement fragments communities and identity, and often drives the displaced to edge communities that lack robust transit and necessitate long commutes and attendant emissions associated with older, affordable motorized vehicles. We recommend the inclusion of the following social equity metrics as performance indicators:

- Number of new affordable units<sup>5</sup>
- Number of new affordable units within a half-mile of high quality transit<sup>6</sup>

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<sup>2</sup> “[Sustainable Communities Strategies and Conservation](#)”. The Nature Conservancy. Page 3.

<sup>3</sup> Potential data source: [Healthy Places Index](#). Public Health Alliance of Southern California.

<sup>4</sup> “[2018 Regional Transportation Plan and Sustainable Communities Strategy Draft Plan: Appendix M2](#)”. Page 10.

<sup>5</sup> Potential data source: Department of Housing and Community Development

<sup>6</sup> Potential data source: American Community Survey; we recommend ARB develop a GIS layer of high-quality transit.

- Average share of low-income residents' household income consumed by transportation and housing<sup>7</sup>
- Jurisdictions with Housing Elements in compliance<sup>8</sup>
- Jurisdictions with anti-displacement policies<sup>9</sup>
- Jobs-Housing fit<sup>10,11</sup>

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*Ensure diverse housing options in all neighborhoods*

Current draft language states that diverse housing options will be concentrated within designated environmental justice neighborhoods at higher rates than other neighborhoods. By clustering different housing types within communities that experience higher rates of environmental and social burdens the RTP/SCS plan may unintentionally be promoting the concentration of neighborhood poverty and segregation. Research shows that providing multifamily and subsidized housing options in all neighborhoods increases household access to opportunity by ensuring residents of all income levels are able to access high-quality schools, jobs and businesses. Broadening the location of diverse housing options would also fall in line with federal and state fair housing goals. We suggest the COG direct staff to develop policy recommendations that can be turned into an “action plan” to be acted on after passage of the RTP. Such an action planning process could be used to create policy solutions related to housing, active transportation, jobs, etc.

6

**Investment Plan and Funding**

Legislative guidance for California’s greenhouse gas reduction efforts includes maximizing social and economic benefits. In addition to lowering vehicle miles traveled (VMT), prioritizing spending on active transportation and transit projects offers substantially more social and economic benefits than roadway projects. Spending \$10 million on public transit yields approximately \$32 million in increased economic activity (APTA<sup>12</sup>). Additionally, transit reduces congestion, provides access to jobs, curbs emissions, and increases mobility for youth and seniors. Spending on active transportation generates a number of positive public health impacts, including lower risk of heart disease, type-2 diabetes, and high-blood pressure (Tulare Council of Governments<sup>13</sup>). Moreover, active transportation infrastructure facilitates last-mile transit access; improves mobility for seniors, youth, and low-income residents; improves

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<sup>7</sup> Data source: Center for Neighborhood Technology H+T Affordability Index

<sup>8</sup> Data source: Department of Housing and Community Development

<sup>9</sup> Potential data source: We recommend ARB develop a GIS layer of jurisdictions with anti-displacement policies.

<sup>10</sup> Benner, Chris & Karner, Alex. (2016). Low-wage jobs-housing fit: identifying locations of affordable housing shortages. Urban Geography. 1-21. UC Davis Center for Regional Change has created a tool to measure JHFit.

<sup>11</sup>

[https://www.fresnocog.org/wp-content/uploads/publications/RTP/Peer\\_Exchange/JHFIT\\_2pager\\_Aug\\_2014.pdf](https://www.fresnocog.org/wp-content/uploads/publications/RTP/Peer_Exchange/JHFIT_2pager_Aug_2014.pdf). Accessed 4/30/2018.

<sup>12</sup> <http://www.apta.com/mediacenter/ptbenefits/Pages/default.aspx>. Accessed 04/26/2018.

<sup>13</sup>

[http://www.tularecog.org/wp-content/uploads/2015/07/Tulare-County-RATP\\_benefits-of-active-transportation\\_v1.1web.pdf](http://www.tularecog.org/wp-content/uploads/2015/07/Tulare-County-RATP_benefits-of-active-transportation_v1.1web.pdf). Accessed 04/26/2018.

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neighborhood livability; and positively impacts the “bottom line of households, businesses and cities” (*ibid.*) due to lower impact on streetscapes and reduced cost of ownership.

In the draft plan, we see a substantial increase in spending for roadway maintenance, and a moderate decrease for roadway capacity. We are encouraged to see more roadway funds being allocated towards fix-it first projects versus new roadway capacity. We are also pleased to see a substantial increase for active Transportation. However, we remain concerned that there is only a slight increase in funds allocated for transit. The 2018 plan should capitalize on the momentum established in the 2014 plan, summarized below in Table A, and continue to prioritize investment in transit. We recommend:

- Reallocation of Roadway capacity funding to *transit* as well as *active transportation and community enhancements* to improve public health, support infill development, and drive economic activity in existing cities. This reallocation would result in:
  - An increase in active transportation funding by 66% over the 2014 RTP/SCS to \$470 million,
  - An increase in transit funding by 33% over the 2014 RTP/SCS to \$4680 million, and
  - A commensurate reduction in roadway capacity by 38% to \$2025 million.

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Table A. 2011-2018 SJCOG RTP/SCS Investments

Project Category	2011 RTP budget (in millions)	2014 RTP/SCS budget (in millions)	2011-2014 % shift	2018 draft RTP/SCS budget (in millions)	2014-2018 % shift
Roadway Operations, Maintenance, and Safety	\$3364	\$3875	+15.2%	\$4448	+14.8%
Transit	\$2747	\$3520	+\$773 +28.1%	\$3572	+\$52 +1.5%
Roadway Capacity (Mainline, Interchanges, Regional Roadways)	\$4441	\$3273	-\$1168 -26.3%	\$3121	-\$152 -4.6%
Active Transportation and Community Enhancements	\$158	\$282	+\$124 +78.5%	\$320	+\$38 +13.5%

### **Community Grants and Public Participation**

Sustainable development is only possible through the involvement of all stakeholders. We would like to acknowledge the 2017 Measure K Bike, Ped, Safe Routes to School (SRTS), and Smart Growth Call for Projects, an innovative public process pilot with nearly \$20 million in combined funding. We support and encourage inclusion of the public and community-based organizations in the project proposal process, and encourage additional efforts. Additional opportunities for public input in transportation projects should be pursued; these efforts increase transparency and facilitate trust, offering both a more robust proposal process while increasing public investment in outcomes. Also, early public input surfaces conflicts that will become more challenging to address later in the process. We recommend:

- *SJCOG develop a grants program to improve active transportation, housing, and help meet SCS goals.* Other Northern California MPOs, including Fresno COG and the Metropolitan Transportation Commission (MTC) have developed grant programs to promote sustainable infrastructure and non-infrastructure such as Safe Routes to School. The Fresno COG's Sustainable Infrastructure Grant Program was approved in 2014 but only recently funded. In the Bay Area, the One Bay Area Grant (OBAG) program began in 2012 and resulted in an increase in active transportation investments, and resulted in 64 new Complete Streets policy resolutions<sup>14</sup> in the Bay Area. Regional investments in these grants programs can also result in a stronger pipeline of projects that can successfully compete for state funding programs such as the state Active Transportation Program and the Affordable Housing and Sustainable Communities program.

The RTP/SCS public outreach mini-grants program should also be recognized as a step towards a more inclusive process. We appreciate the COG's efforts in reaching out to trusted community organizations to facilitate public input and providing funding to do so. We encourage the continuation of this program beyond the RTP/SCS update process in order to elevate the priorities of underserved communities.

### **Conclusion**

SB 375 provides MPOs with the opportunity to provide clear guidance to local jurisdictions to work collaboratively to meet state-mandated greenhouse gas reduction goals. We understand and appreciate the inherent challenges in aligning transportation and land use planning. The landscape is changing: emerging technologies, policy innovations, shifting demographics, and economic challenges must be addressed. These challenges are best met through a collective effort of all stakeholders. We ask that the COG adopt a bold, ambitious, and achievable second round RTP/SCS that builds on the vision and priorities of the final 2014 plan.

We appreciate the ongoing efforts of COG staff, committees, and Council members, and we look forward to our continued work with you.

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<sup>14</sup> <https://escholarship.org/uc/item/49w1v7wz#main>. Accessed 4/30/2018.

Respectfully submitted,

Yolanda Park  
*Program Manager, Catholic Charities Diocese of Stockton*

Christopher Escárcega  
*Regional Engagement Coordinator, ClimatePlan*

Marty Martinez  
*Northern California Regional Policy Manager, Safe Routes to School National Partnership*

Tammy Evans, RN, PHN, MSN, PhD  
*Director, San Joaquin County Public Health Services*

Christina Peoples  
*Program Manager, Public Health Advocates*

Jasmine Leek  
*Director, Third City Coalition*

Esperanza Vielma  
*Executive Director/Co Founder, Cafe Co-op*

Cc: Diane Nguyen, Deputy Director - Planning/Programming & Project Delivery  
Kim Anderson, Senior Regional Planner  
Ryan Nyblock, Senior Regional Planner  
Christine Corrales, Associate Regional Planner

## Letter 4

**COMMENTER:** Catholic Charities Diocese of Stockton, Yolanda Park, Program Manager; ClimatePlan, Christopher Escarcega, Regional Engagement Coordinator; Safe Routes to School Northern Partnership, Marty Martinez, Northern California Regional Policy Manager; San Joaquin County Public Health Services, Tammy Evans, Director; Public Health Advocates, Christina Peoples, Program Manager; Third City Coalition, Jasmine Leek, Director; Café Co-op, Esperanza Vielma, Executive Director/Co-Founder

**DATE:** April 30, 2018

### Response 4.1

The commenter expresses their thanks for the opportunity to comment on the 2018 RTP/SCS, and their appreciation regarding the outreach efforts SJCOG has made with local organizations. This comment is noted.

### Response 4.2

The commenter states they are encouraged by the expected GHG reductions that would occur from the 2018 RTP/SCS; however, the commenter is concerned with the metric used to determine emission reductions (VMT per capita), and includes recommendations to achieve further VMT reductions.

This comment pertains to the performance metrics and scenario selection process of the 2018 RTP/SCS, and not the Draft EIR. The performance measures used to determine the efficiency and success of the RTP/SCS are discussed in detail in Chapter 5 and Appendix M of the 2018 RTP/SCS, with a general summary of the RTP/SCS included in Section 2.3, including Sections 2.3.1 through 2.3.4. As discussed in Section 4.9, *Greenhouse Gas Emissions/Climate Change*, of the DEIR, and subsequently analyzed in Section 2.0, *Corrections and Additions*, of the FEIR, further VMT reductions are not necessary to satisfy SB 375 requirements or further reduce impacts, since the 2018 RTP/SCS would not interfere with statewide reduction targets encoded in SB and AB 32. This comment is noted and does not require further response or revisions to the DEIR.

### Response 4.3

The commenter correctly states that the San Joaquin valley contains a large amount of productive farmland, and states their concern with development in agricultural areas. The commenter recommends that the 2018 RTP/SCS forecast land use growth to occur as infill development, and within established urban growth boundaries, as well as developing or adopting conservation-related criteria for highway project prioritization.

This comment pertains to the 2018 RTP/SCS and not the Draft EIR. The 2018 RTP/SCS is based on Scenario 2A, which invests in transportation systems that complement compact infill growth, and intends to minimize impacts to agricultural land. The impacts related to the conversion of agricultural land are discussed in Impact AG-1 in Section 4.2, *Agricultural Resources*, of the DEIR. As discussed, although the incorporation of Mitigation Measure AG-1 would reduce impacts to the extent feasible, the conversion of agricultural land would result in a significant and unavoidable impact due to the irreversible effects of land conversion. As discussed in Section 6.0, *Alternatives*, of

the DEIR, Alternative 3: Compact Development supports a denser, compact land use strategy which would result in fewer agricultural acres converted, compared to the proposed project, and this alternative was determined to be the environmentally superior alternative. Regardless, direct conversion of agricultural land would still occur, and impacts would remain significant and unavoidable. This comment is noted and does not require further response or revisions to the DEIR.

#### **Response 4.4**

The commenter states their support for SJCOG's pilot program to track health and wellness, and recommends further metrics that can be used to evaluate and elevate public health. In addition, the commenter recommends that the funding for transportation projects should be contingent upon these public health indicators.

This comment pertains to the metrics used to evaluate the performance of the 2018 RTP/SCS and not the Draft EIR. Health issues from the emissions of criteria air pollutants are discussed in Section 4.3, *Air Quality*, and health/safety risks from hazardous materials as they pertain to public health are discussed in Section 4.10, *Hazards and Hazardous Materials*. This comment is noted.

#### **Response 4.5**

The commenter states background information regarding social inequalities for low-income communities, and that displaced communities often lack robust transit opportunities.

This comment pertains to the metrics used to evaluate the performance of the 2018 RTP/SCS and not the Draft EIR. Social equality issues are discussed in Section 4.7, *Environmental Justice*. As discussed in Impact EJ-1, the 2018 RTP/SCS would not disproportionality affect low income or minority populations throughout San Joaquin County. This comment is noted and does not require further response or revisions to the DEIR.

#### **Response 4.6**

The commenter suggests that SJCOG develop policy recommendations that be turned into an action plan, which can be used to create policy solutions related to housing, active transportation, and jobs.

This comment does not pertain to the analysis of the DEIR, or raise any issues regarding the CEQA component of this project. This comment has been forwarded to the decision makers as part of the environmental review process and consideration of the 2018 RTP/SCS.

#### **Response 4.7**

The commenter states their support for increased funding of active transportation project investments, and states their concern that the 2018 RTP/SCS only includes a slight increase in funds allocated for transit.

This comment pertains to the breakdown of funding and investment types in the 2018 RTP/SCS and not the DEIR. As discussed in Section 6.0, *Alternatives*, of the DEIR, Alternative 3: Compact Development has increased funding and emphasis on compact growth and infill, as well as additional transit and active transportation improvements. The alternative was determined to be the environmentally superior alternative, and will be taken into consideration during the environmental review process. This comment in support of this alternative has been forwarded to the decision makers.

## Response 4.8

The commenter acknowledges and states their appreciation of SJCOG's efforts in public participation throughout the RTP/SCS process, and further reiterates working collaboratively between all shareholders and stakeholders.

This comment does not pertain to the analysis of the DEIR, or raise any issues regarding the CEQA component of this project. This comment has been forwarded to the decision makers, and does not require further response or revisions to the DEIR.

# TERRA LAND GROUP, LLC

March 28, 2018

## Letter 5.1

VIA EMAIL

San Joaquin County Council of Governments  
Attn: Kim Anderson  
555 East Weber Avenue  
Stockton, CA 95202  
(sjcog.rtp@gmail.com)

**Re: March 2018 Regional Transportation Plan/Sustainable Communities Strategy Draft  
Programmatic Environmental Impact Report: Public Comments (LETTER #1).**

Dear Project Team,

My name is Martin Harris and I am an authorized representative for Terra Land Group, LLC ("TLG"). TLG owns several properties located in the Lower San Joaquin River Basin that may benefit or be adversely affected as a result of various local, state, or federal government flood protection improvement actions currently being considered for future implementation.

At this time, TLG is in receipt of the March 2018 Regional Transportation Plan/Sustainable Communities Strategy Draft Programmatic Environmental Impact Report ("RTP/SCS"). TLG presents the following responses to the RTP/SCS with the hope that the public concerns detailed in this letter will be carefully considered by the San Joaquin Council of Governments ("SJCOG") Board Members and staff prior to making any decision affecting flood protection drainage in and along the Lower San Joaquin River Basin and especially the areas affecting the urban and rural areas of Manteca and Lathrop.

As recent flooding in Houston, Texas has demonstrated, unrestrained development without consideration for flood impacts can have serious consequences. In particular, as more and more development projects continue to move forward, TLG has put forth a regular effort to ensure that local authorities are aware of the need for cumulative environmental review and analysis of all hydrology-related impacts associated with all currently existing and foreseeable development projects affecting drainage in and along the Lower San Joaquin River Basin, especially the areas affecting the urban and rural areas of Manteca and Lathrop.

For some time now, TLG has sent various copies of our letters to SJCOG and other authorities expressing public concern related to development in the floodplain and the need to examine any potential impacts related to San Joaquin River (and tributary) flow deficiencies and the potential for upstream and downstream channel flow stage increases due to drainage patterns affected by grade, levee location, and other environmental considerations. (See public concerns presented in **Enclosure 1** which also contains a list of letters and related items in its own Enclosure 1. This list contains information that TLG believes is

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important to consider in the decision making process. In particular, TLG believes letter items 9, 10, 21, 22, 25, and 28 directly apply to this project. Also **See Enclosure 2:** List of Environmental Impact Reports and Feasibility Studies Reviewed by TLG in preparation of this letter. Finally, also **See Enclosure 3:** March 5, 2018 letter from TLG to the San Joaquin County Local Agency Formation Commission “LAFCo”)

Through careful study, the letters included in Enclosure 1 can offer significant details relating to what appears to be very significant drainage impacts affecting the Lower San Joaquin River Drainage system and in particular the study area as described to include the areas detailed below. (The following quotes are taken from the January 2018 Lower San Joaquin River Project Interim Report San Joaquin County, California Final Integrated Interim Feasibility Report/Environmental Impact Statement/Environmental Impact Report (“LSJRFS”).)

1. Page ES-1 of the LSJRFS states: *The study area also includes the distributary channels of the San Joaquin River in the southernmost reaches of the Delta; Paradise Cut and Old River as far north as Tracy Boulevard, and Middle River as far north as Victoria Canal.*
2. Page 3-31 of the LSJRFS states: *Currently, the levee safety program has defined the levee system that incorporates RD 17 as bounded on the north by Walker Slough, west by the San Joaquin River and south by the Stanislaus River. This includes RD 17, RD 2096, RD 2094, RD 2075, and RD 2064.*
3. Page 5-17 of the LSJRFS states: **Stanislaus River to Paradise Cut.** *The confluence of the San Joaquin and Stanislaus Rivers defines the upstream extent of the hydraulic model used for this study.*
4. Page ES-2 of the LSJRFS states:  
*Analysis of the study area is challenged by the presence of three sources of flooding, The Delta Front, Calaveras River and San Joaquin River. This results in commingled floodplains for the North and Central Stockton areas. The distributary nature of the Delta also affects Delta water levels, because high river flows from the Sacramento River may “fill” the Delta prior to a peak inflow on the San Joaquin River as occurred in 1997, raising water levels on the Delta front levees.*
5. Page 5-27 of the LSJRFS states: **2.1.1 FLOODING Problem: There is significant risk to public health, safety, and property in the study area associated with flooding.** *The study area is located in the Central Valley of California which has very little topographic relief, resulting in potential flooding of areas far from water courses...*

## I. 2018 RTP/SCS Transportation Projects that may affect drainage along the South Delta Front-Lower San Joaquin River Basin.

**See Enclosure 4** for Tables 6-1, 6-2, 6-3, and 6-6 of Appendix B as taken from the RTP/SCS. This is supported by 100-year flood zone mapping described on Page 264 of the RTP/SCS.

## II. Hydrology/Impacts and Associated Mitigation Measures to Consider

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Page 279 of the RTP/SCS states:

*A portion of the transportation projects included in the proposed 2018 RTP/SCS could occur within the 100-year flood hazard area, thus increasing the potential to obstruct or exacerbate floodwaters. The construction of projects involving support structures in the floodway could obstruct floodwaters at some locations. Placement of structures within a floodplain can displace floodwaters and alter the base flood elevations in the surrounding areas. Structures can form a backwater effect, resulting in an increase in the flood elevation level upstream and in neighboring areas. Likewise, floodwater can cause scour effects, resulting in erosion and sedimentation problems downstream from structures. Drainage areas could be altered by highway corridors, in which floodwaters could be detained by medians and along the roadside. Proposed bridge supports could block debris in waterways, creating obstructions and further elevating upstream flood levels. The Plan could alter existing drainage patterns or substantially increase the rate or amount of surface runoff in a manner that would result in flooding or produce or contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems.*

In addition, Page 279 of the RTP/SCS further details how placement of new structures within the existing floodplain can impede flood waters, altering the flood risks both upstream and downstream. Further, Page 280 of the RTP/SCS offers flood mitigation measures W-3(a), W-3(b), and W-3(c). These describe the potential for significant and unavoidable impacts that may not be foreseeable when considering all project circumstances that may or are likely to occur. (See Enclosure 5)

COMMENT: With that in mind, TLG calls your attention to recently presented information in the form of TLG's public review and comments submitted in response to the recently released January 2018 San Joaquin River Basin Lower San Joaquin River, CA FINAL Integrated Interim Feasibility Report/Environmental Impact Statement/Environmental Impact Report ("LSJRFS"). (See Enclosure 1 and associated letters included in its own Enclosure 1)

Further, TLG believes that it is important to mention that the LSJRFS may not fully consider the potential for any and all flood and other hydrology related impacts involved due to RD 17's plan to pursue a phased strategy of levee improvements and other Federally assisted improvements in order to meet SB 5 requirements. (See page 3-40 of the LSJRFS).

This is especially important when you consider that Page 3-42 of the LSJRFS states:

*The identification of Alternative 7a as the NED Plan serves to set the level of Federal participation in the project. Alternative 7a may not fully meet the NFS objective of SB 5 compliance, but in order to expedite authorization, the NFS elected not to pursue a Locally Preferred Plan (LPP) at this time.*

**QUESTION:** What non-federal sponsor elected not to pursue a Locally Preferred Plan at this time? Is it in the public's best interest to allow a non-federal sponsor to pursue any flood risk management plan that places emphasis on expediting the process over taking the time to consider and mitigate against the

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potential for very significant drainage impacts affecting the developing and non-developing urban and rural areas of Manteca and Lathrop?

Most concerning is TLG's belief that it is the intent of local authorities to assign a project sponsor to seek Section 408 approval from the U.S. Army Corps of Engineers allowing expansion and/or relocation of the RD 17 dry land cross levee system to a location south of the point that Paradise Cut and the San Joaquin River converge. **(See Enclosure 1)**

It is in this way that TLG believes the City of Manteca intends to move forward with plans to gain the approvals necessary to construct critical but currently unidentified public services infrastructure supporting:

- (i) Storm water drainage,
- (ii) Treated and untreated wastewater spray field discharge,
- (iii) Groundwater sustainability through percolation and recharges, and
- (iv) Traffic circulation

as necessary to accommodate the rapid pace of development affecting both the urban and rural developing and non-developing areas of our community.

Why is this important? Due to widely-recognized San Joaquin River drainage channel (and associated tributary) flow deficiencies both upstream and downstream of the point that the San Joaquin River and Paradise Cut converge, TLG believes that any number of RTP/SCS transportation infrastructure projects involving support structures in the floodway could obstruct floodwaters and increase flood elevation levels upstream and in neighboring areas. **(See Enclosure 1)**

Most important, TLG believes that the proposed mitigation measures associated with RTP/SCS transportation infrastructure projects may be inadequate in relation to the potential for what appears to be very significant flood impacts affecting the rural areas south of Manteca. **(See Enclosure 5)**

For this reason, TLG believes that more needs to be done to properly identify and mitigate any and all flood and other hydrology related impacts created in support of reducing any increased impacts to less than significant levels.

Thank you for your attention to this important matter.

Respectfully,



Martin Harris  
for Terra Land Group, LLC

MH/cm

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## Enclosures:

1. February 26, 2018 letter from TLG to San Joaquin Area Flood Control Agency. *Please access this Enclosure by downloading the file through this Dropbox link:*  
([https://www.dropbox.com/s/8scnhemfwexbkr9/2018-02-26\\_LTR\\_SJAFCA\\_LSR%20EIR\\_PublicComm\\_wEncl.pdf?dl=0](https://www.dropbox.com/s/8scnhemfwexbkr9/2018-02-26_LTR_SJAFCA_LSR%20EIR_PublicComm_wEncl.pdf?dl=0))
2. List of Environmental Impact Reports and Feasibility Studies Reviewed by TLG
3. March 5, 2018 letter from TLG to the San Joaquin County Local Agency Formation Commission. *Please access this Enclosure by downloading the file through this Dropbox link:*  
([https://www.dropbox.com/s/vrxhht508075ro8/2018-03-05\\_LTR\\_LAFCo\\_Aglt3.pdf?dl=0](https://www.dropbox.com/s/vrxhht508075ro8/2018-03-05_LTR_LAFCo_Aglt3.pdf?dl=0))
4. Tables 6-1, 6-2, 6-3, and 6-6 of Appendix B as taken from the March 2018 Regional Transportation Plan/Sustainable Communities Strategy Draft Programmatic Environmental Impact Report
5. Pages 279-280 as taken from the March 2018 Regional Transportation Plan/Sustainable Communities Strategy Draft Programmatic Environmental Impact Report

## cc:

Central Valley Flood Protection Board, Attn: Leslie Gallagher, Executive Officer  
(leslie.gallagher@cvflood.ca.gov)  
San Joaquin Area Flood Control Agency, Attn: Marlo Duncan, Project Manager  
(marlo.duncan@stocktongov.com)

## List of Environmental Impact Reports and other Environmental and Technical Documents Reviewed by Terra Land Group

- “Regional Transportation Plan/Sustainable Communities Strategy Draft Programmatic Environmental Impact Report;” San Joaquin Council of Governments, March 2018.
- “Draft Regional Transportation Plan Sustainable Communities Strategy;” San Joaquin Council of Governments (“SJCOG”), 2018.
- “San Joaquin River Basin Lower San Joaquin River, CA FINAL Integrated Interim Feasibility Report/Environmental Impact Statement/Environmental Impact Report;” San Joaquin Area Flood Control Agency (“SJAFCA”), Central Valley Flood Protection Board (“CVFPB”), US Army Corps of Engineers (“USACE”), January 2018.
- “DRAFT Municipal Service Review Selected San Joaquin County Reclamation Districts;” San Joaquin Local Agency Formation Commission, December 20, 2017.
- “SSJID and City of Manteca Request for Proposal for Master Plan Study for the French Camp Outlet Canal;” South San Joaquin Irrigation District, City of Manteca, November 2017.
- “DRAFT Technical Memorandum Central Valley Flood Protection Plan Investment Strategy;” California Department of Water Resources (“DWR”), August 2017.
- “Central Valley Flood Protection Plan 2017 Update [Final];” DWR, August 2017.
- “Draft EIR for the Oakwood Landing-Cerri & Denali Subdivisions;” DeNovo Planning Group, July 2017.
- “Draft Environmental Impact Report San Joaquin Regional Rail Commission ACEforward;” ICF, May 2017.
- “San Joaquin River Basin-Wide Feasibility Study;” DWR, March 2017.
- “Flood System Long-Term Operations, Maintenance, Repair, Rehabilitation, and Replacement Cost Evaluation: Draft Technical Memorandum;” DWR, January 2017.
- “Central Valley Flood Protection Plan 2017 Update Draft;” DWR, December 2016.
- “Bay Delta Conservation Plan/California WaterFix Final EIR/EIS;” DWR, U.S. Bureau of Reclamation, December 2016.
- “CVFPB Supplemental Program Environmental Impact Report;” DWR, December 2016.
- “Recirculated Draft: Substitute Environmental Document in Support of Potential Changes to the Water Quality Control Plan for the San Francisco Bay-Sacramento San Joaquin Delta Estuary; San Joaquin River Flows and Southern Delta Water Quality;” California State Water Resources Control Board, California Environmental Protection Agency, September 2016.
- “2017 CVFPB Update Scoping Report;” DWR, July 2016.
- “San Joaquin River Basin Lower San Joaquin River, CA Draft Integrated Interim Feasibility Report/EIS/EIR;” USACE, SJAFCA, February 2015.
- “Final EIR Phase 3-RD 17 Levee Seepage Repair Project Administrative Draft;” Reclamation District No. 17, March 2015.
- “Lower San Joaquin River and Delta South Regional Flood Management Plan;” SJAFCA, November 2014.
- “Draft: Lower San Joaquin River and Delta South Regional Flood Management Plan;” SJAFCA, January 2014.
- “Environmental Impact Statement: River Islands at Lathrop, Phase 2B;” USACE, October 2014.

- “2012 Central Valley Flood Protection Plan (“CVFPP”);” DWR, June 2012.
- “Regional Mercury Load Reduction Evaluation Central Valley, California;” US Environmental Protection Agency Region 9, CA Regional Water Quality Control Board: Central Valley Region, August 2008.
- “Investing in California's Flood Future: An Outcome-Driven Approach to Flood Management;” Presentation at the Floodplain Management Association Conference, DWR, September 2016.
- “Storms and Flooding in California in December 2005 and January 2006--a Preliminary Assessment;” US Geological Survey, 2006.
- “French Camp Outlet Canal-Hydraulic Capacity Analysis Final Report;” CH2M Hill, February 2002

# Appendix B

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2018 RTP/SCS Transportation Project List

Table 6-1: 2018 Regional Transportation Plan Project List - Mainline Highway Improvements Category

Identifiers	2018 RTP MPO ID	CTIPS ID #	PPNO	Project Information		Project Description	Project Limits	Cost to Deliver	Total	Milestone Years					
				Jurisdiction	Facility Name/Route					FTIP Programming	NEPA Approval	Open to Traffic	MK Renewal Project	RTIF Project	
SJ14-1004	212-0000-0665			Caltrans	SR 99/120 Operational Improvements	Construct a second lane on the SR 99 NB Off-ramp/SR-120 WB On-Ramp and on the SR-120 EB off-ramp/SR-99 SB On-Ramp. Reconstruct Austin Road Overcrossing. Widen SR-120 from 4 lanes to 6 between Main Street and SR-99. Construct auxiliary lanes on SR-99 between SR-120 and Olive Avenue.	On SR-120 from Main Street (P.M. 5.13) to SR-99 and on SR-99 from SR-120 to Olive Avenue (P.M. 6.22)	\$76,711,000	2015	2018	2023	X			
SJ07-1003				Caltrans	I-205 HOV	Widen from 6 to 8 lanes (inside/outside)	Alameda County Line to Eleventh Street	\$95,874,000		2020	2026	X			
SJ14-1001				Caltrans	I-205 HOV	Widen from 6 to 8 lanes (inside/outside)	Eleventh Street to MacArthur Drive	\$102,000,000		2020	2026	X	X		
SJ14-1002				Caltrans	I-205 HOV	Widen from 6 to 8 lanes (inside/outside)	MacArthur Drive to I-5	\$100,000,000		2020	2026	X			
SJ07-1008				Caltrans	I-5 HOV Mossdale	Widen to add HOV lanes with HOV Connector Ramps to I-205 and SR-120	I-205 to Louise Avenue (P.M. 12.5/R 16.5)	\$207,970,000		2022	2028	X	X		
SJ07-1014				Caltrans	SR-120	Widen 4 to 6 lanes (inside)	I-5 to Main Street (P.M. 5.13)	\$95,191,000		2024	2030	X			
SJ18-1001				Caltrans	SR-99 HOV	Widen 6 to 8 lanes (inside/outside), including reconstruction of SR-99/Main Street and SR-99/Wilma Avenue interchanges and pedestrian overcrossing	SR-120 to Stanislaus County Line	\$200,000,000		2026	2032				
SJ11-1001				Caltrans	I-5 HOV	Widen from 6 to 8 lanes (inside median) including auxiliary lanes	Hammer Lane to North of Eight Mile Road	\$124,620,000		2009	2036	X			
SJ07-1005				Caltrans	I-5 HOV	Widen 6 to 8 lanes (inside)	French Camp Road to Charter Way	\$97,880,000		2030	2038	X			
SJ07-1006				Caltrans	I-5 HOV	Widen 6 to 8 lanes (inside)	Louise Avenue to French Camp Road	\$193,880,000		2032	2040	X			
SJ14-1003				Caltrans	SR-99 Widening	Widen 4 to 6 lanes (inside) - ENVIRONMENTAL ONLY	Harney Lane to Turner Road	\$3,000,000							
								<b>\$1,297,126,000</b>							

Table 6-2: 2018 Regional Transportation Plan Project List - Interchange Improvements Category

Identifiers	2018 RTP MPO ID	CTIPS ID #	PPNO	Project Information			Project Description	Project Limits	Cost to Deliver	Total	Milestone Years					
				Jurisdiction	Facility Name/Route						FTIP Programming	NEPA Approval	Open to Traffic	M/R Renewal Project	RTIP Project	
SJ07-2005				Lathrop	I-5 at Louise Avenue		Reconstruct interchange (PM 16.4-16.8)	I-5 at Louise Avenue	\$28,754,000			2024	2030	X		
SJ07-2004				Lathrop	I-5 at Lathrop Road		Reconstruct interchange (P.M. 17.3/17.8)	I-5 at Lathrop Road	\$39,146,000			2029	2033	X		
							Relocation of intersection at Roth/Harlan Road inclusive of signalization; relocation of intersection at Roth/Mantney Road inclusive of signalization. Widen from 2 to 5 lanes from Roth/Harlan road intersection to Roth/Mantney Road Intersection									
SJ11-3066				Lathrop	I-5 at Roth Road		Reconstruct interchange - SR 120 at Yosemite Ave/Guthmiller Road	I-5 at Roth Road	\$16,800,000				2020			
SJ14-2004				Lathrop	SR 120 at Yosemite Ave/Guthmiller Road		ENVIRONMENTAL ONLY	SR 120 at Yosemite Ave/Guthmiller Road	\$3,000,000							
SJ11-2015				Lodi	SR-99 at SR-12 West (Kettleman Lane)		Reconstruct interchange and widen to free flowing interchange	SR-99 at SR-12 West (Kettleman Lane)	\$50,000,000			2030	2036	X		
							Reconstruct interchange to provide 6 through lanes on SR 99, 4 lanes on Harney between Reynolds Ranch Pkwy and SR 99 and modify on-ramps and off-ramps									
SJ07-2006				Lodi	SR-99 at Harney Lane		Reconstruct interchange to provide operational and safety improvements on SR 99 at Turner Road (PM 31.3/31.6)	SR-99 at Harney Lane	\$35,362,000			2009	2028	2033	X	
SJ07-1020	112-0000-0347			Lodi	SR-99 at Turner Road		Reconstruct interchange (P.M. 4.1/4.1)	SR-99 at Turner Road	\$6,142,986			2019	2036	2041	X	
SJ07-2012				Manteca	SR-120 at Union Road		Construct new interchange	SR-120 at Union Road	\$22,000,000					2021	X	
SJ07-2009	212-0000-0231			Manteca	SR-120 at McKinley Ave		Reconstruct interchange	SR-120 at McKinley Avenue	\$37,850,000			2009	2014	2022	X	X
SJ18-2001				Manteca	SR-120 at Airport Way		Reconstruct interchange	SR-120 at Airport Way	\$36,828,000					2029	2031	X
SJ18-2002				Manteca	SR-120 at Main Street		Construction of new interchange - ENVIRONMENTAL ONLY	SR-120 at Main Street	\$36,828,000					2031	2033	X
SJ14-2001				Manteca	SR-99 at Raymus Expressway		Interchange Modification and auxiliary lanes (PM 32.6)	SR-99 at Raymus Expressway	\$3,000,000						X	X
SJ11-2004	212-0000-0309			Stockton	I-5 at Hammer Lane		Construction of a new interchange and auxiliary lanes (PM 33.3/34.2)	I-5 at Hammer Lane	\$47,164,647			2007	2009	2036		
SJ11-2006	212-0000-0309			Stockton	I-5 at Otto Drive		Modification of interchange (P.M. 34.7/35.9)	I-5 at Otto Drive	\$103,371,218			2007	2009	2036		
SJ07-2020	212-0000-0309			Stockton	I-5 at Eight Mile Road		Reconstruct Interchange (PM 35.1-35.5)	I-5 at Eight Mile Road	\$57,255,179			2007	2009	2036		
SJ11-2002	212-0000-0562			Stockton	SR-99 at Eight Mile Road		Reconstruct interchange (PM 23.5-24.5)	SR-99 at Eight Mile Road	\$93,070,215				2030	2036	X	
SJ11-2001	212-0000-0561			Stockton	SR-99 at Morada		Construct Interchange I-205 at Eleventh street realign and widen Eleventh Street to 6-lanes north of Grant Line to Byron Road. Construct Aux lane Hansen to Eleventh; in WB I-205 Eleventh Street to Grant Line Road	SR-99 at Morada	\$96,474,024				2030	2036		
							Construct Interchange I-205 at Eleventh street realign and widen Eleventh Street to 6-lanes north of Grant Line to Byron Road. Construct Aux lane Hansen to Eleventh; in WB I-205 Eleventh Street to Grant Line Road									
SJ11-2010	212-0000-0227			Tracy	I-205/Lammers Rd/Eleventh St		Reconstruct interchange	I-205 at Mountain House Parkway	\$51,500,000			2007	2012	2022	X	
SJ14-2002				Tracy	I-580 at International Pkwy/Patterson Pass Road		Reconstruct interchange	I-205 at Mountain House Parkway	\$9,000,000			2015	2018	2021	X	
SJ14-2003				Tracy	I-205 at Mountain House/International Pkwy		Modification of existing interchange - ENVIRONMENTAL ONLY	I-205 at Mountain House Parkway	\$4,000,000			2015	2018	2021	X	X
SJ11-2011				Tracy	I-205 at Grant Line Road		Phase 1: Construct new interchange east-west ramps	I-205 at Grant Line Road	\$32,574,820				2018	2024		
SJ11-2012	212-0000-0228			Tracy	I-205 at Chrisman Rd		Modification of existing interchange - ENVIRONMENTAL ONLY	I-205 at Chrisman Rd	\$36,056,267			2009	2020	2026		
SJ18-2003				Tracy	I-205 / MacArthur Interchange modification		At MacArthur (PM 7.8 -PM 8.5)	At MacArthur (PM 7.8 -PM 8.5)	\$9,670,000							
SJ11-2031				Tracy	I-580 at Corral Hollow Road		Modification of existing interchange - ENVIRONMENTAL ONLY	I-580 at Coral Hollow Road	\$5,500,000				2018			
SJ11-2032				Tracy	I-580 at Lammers Road		Construction of new interchange - ENVIRONMENTAL ONLY	I-580 at Lammers Road	\$5,500,000				2018			
									<b>\$866,847,355</b>							



**Table 6-6: 2018 Regional Transportation Plan Project List - Rail Corridor Improvements Category**

Identifiers	2018 RTP MPO ID	CTIPS ID #	PPNO	Project Information		Project Description	Project Limits	Cost to Deliver		Milestone Years		
				Jurisdiction	Facility Name/Route			Total	Total	FTIP Programming	NEPA Approval	Completion Date
SJ07-6001	112-0000-0139			Caltrans	Caltrans Intercity Rail	Construct double main track, panelized turnouts, relocate/renew siding turnout, and realign existing trackage.	San Joaquin County between Escalon and Stockton		\$34,012,294			
SJ11-6001	112-0000-0277			Caltrans	Caltrans Intercity Rail Passenger Facility	In Stockton, Construct track connections and a new intercity passenger rail facility	Intersection of the BNSF and UP railroads.		\$19,622,477			
SJ07-6003	212-0000-0281/ 212-0000-0645			SJRR	ACE Capital	Purchase rail cars for ACE service expansion	ACE Capital		\$9,593,211			
SJ07-6004	212-0000-0190			SJRR	ACE Capital	SJRR shared costs for the overall maintenance of vehicles	ACE Capital		\$8,245,801			2030
SJ07-6009				SJRR	ACE Capital	Realignment of tracking	Near Altamont Pass		\$9,811,239			
SJ07-6013	112-0000-0140			SJRR	ACE Capital	Restoration of abandoned Western Pacific Depot building	Downtown Stockton, between Weber Ave and Miner Ave		\$7,630,963	2007		
SJ07-6015	212-0000-0306			SJRR	Stockton Track Extension Phases II & III (ACE Gap Closure Project)	Allow SJRR to operate on separate tracks from Union Pacific Railroad between maintenance yard and the station siding.	Between the Stockton ACE Station and the ACE Equipment Maintenance Facility		\$20,712,615			
SJ07-6016				SJRR	ACE Service Extensions	Enhance/extend rail to benefit residents; integrate ACE with the State intercity rail service; extend ACE service	San Joaquin County and San Joaquin Valley; Sacramento, Modesto, and San Francisco		\$9,334,848			2030
SJ07-6017				SJRR	ACE Forward	Acquisition of ACE Corridor between Stockton and Niles Junction	Between Stockton and Niles Junction		\$49,056,193			
SJ07-6018				SJRR	Phase II Implementation Plan for the Central Valley Rail Service	Commuter rail service	Central Valley to Sacramento		\$1,090,138			
SJ07-6019				SJRR	Operations	Shuttle Services in San Joaquin County stations	San Joaquin County		\$1,224,225			2030
SJ07-6020				SJRR	Capital	Maintenance Facility Expansion from 9 train sets to 17 train sets Phase 2	City of Stockton		\$17,000,000			2020
SJ07-6021				SJRR	ACE Operations	ACE operations and Capital Access Fee (5 trains from 2012 to 2016, 6 trains from 2017 to 2021, 7 trains from 2022 to 2029 and 8 trains from 2030 to 2041)	SJRR/Santa Clara/Alameda contributions shown		\$556,612,929			2030
SJ07-6023				SJRR	Rail Information Systems	Rail Information Systems (Ticket vending machines, on-train internet, changeable message signs at stations, trip planner via internet, real time system for train status for ACE and other connecting services)	ACE Operational Corridor and Station Planning Areas		\$14,607,844			
SJ07-6025				SJRR	Central Valley Rail Service	Central Valley Rail Service Operations and Maintenance, Capital Access Fees, ROW purchase)	Central Valley to Sacramento		\$92,661,697			
SJ07-6028				SJRR	ACE Capital	Rolling Stock/Track Improvements/ Station Improvements	ACE Operational Corridor and Station Planning Areas		\$34,884,404			2030
SJ07-6029				SJRR	ACE Capital	Central Valley to Sacramento Commuter Rail Project - Extension of services	Central Valley to Sacramento		\$58,867,431			
SJ07-6035				SJRR	ACE Capital	Altamont Corridor Speed and Safety upgrades (including signal upgrade to automatic train stop increase train speed from 79 to 90 MPH and several track realignment projects)	ACE Operational Corridor and Station Planning Areas		\$32,704,128			
SJ14-6005				SJRR	Minor Capital	Facilities and information technology maintenance and enhancements, fleet vehicle replacements and expansion	ACE Operational Corridor and Station Planning Areas		\$9,669,521			2030
SJ14-6001				SJRR	ACEforward: Capital Phase 1	Extension of Wyche Siding	Lathrop/Manteca: MP 82.7 to MP 80.4, 8,500' clear of McKinley Ave		\$9,000,000			2022
SJ14-6002				SJRR	ACEforward: Capital Phase 1	Connection from UPRR Fresno Sub to UPRR Oakland Sub	Lathrop, Ca: Oakland Sub MP 84.25 to Fresno Sub MP 94.1		\$7,848,492			2018
SJ14-6003				SJRR	ACEforward: Capital Phase 2	Grade crossing improvements/grade separations	High priority locations between Stockton and San Jose. Chrisman Rd MP 72.8, McKinley Ave MP 82.1		\$15,000,000			2022
SJ14-6006				SJRR	Robert J. Cabral Station Expansion	Construct park and ride lot and related on-street parking, sidewalks, lighting, security, and other passenger amenity improvements	In Stockton, between the UPRR, Weber Avenue, Union Street, and Main Street		\$1,311,000			2020
				SJRR	Lathrop/Manteca Station Platform Extension project	Lengthen platform at current Lathrop/Manteca Station to allow for eight car train capacity	Lathrop/Manteca		\$1,791,000			2022

While the majority of growth will take place outside of flood zones, some new housing could occur within flood zones. The proposed 2018 RTP/SCS could increase the amount of housing in flood hazard areas, but state regulations, in combination with local ordinances and federal regulations, as well as ongoing improvements to flood protection infrastructure, would likely mitigate the risk associated with housing in these areas. Further, individual project sponsors are required by state and federal regulations to obtain necessary approvals for construction within designated floodplains.

A portion of the transportation projects included in the proposed 2018 RTP/SCS could occur within the 100-year flood hazard area, thus increasing the potential to obstruct or exacerbate floodwaters. The construction of projects involving support structures in the floodway could obstruct floodwaters at some locations. Placement of structures within a floodplain can displace floodwaters and alter the base flood elevations in the surrounding areas. Structures can form a backwater effect, resulting in an increase in the flood elevation level upstream and in neighboring areas. Likewise, floodwater can cause scour effects, resulting in erosion and sedimentation problems downstream from structures. Drainage areas could be altered by highway corridors, in which floodwaters could be detained by medians and along the roadside. Proposed bridge supports could block debris in waterways, creating obstructions and further elevating upstream flood levels. The Plan could alter existing drainage patterns or substantially increase the rate or amount of surface runoff in a manner that would result in flooding or produce or contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems.

Storm water runoff is influenced by rainfall intensity, ground surface permeability, watershed size and shape, and physical barriers. The introduction of impermeable surfaces greatly reduces natural infiltration, allowing for a greater volume of runoff. In addition, paved surfaces and drainage conduits can accelerate the velocity of runoff, concentrating peak flows in downstream areas faster than under natural conditions. Significant increases to runoff and peak flow can overwhelm drainage systems and alter flood elevations in downstream locations. Increased runoff velocity can promote scouring of existing drainage facilities, reducing system reliability and safety.

The 2018 RTP/SCS would result in increased impervious surfaces through transportation projects and development. Additional impervious surfaces increases storm water runoff volumes and peak flow rates. This increase has the potential to create or contribute runoff flows that would exceed the capacity of existing or planned storm water drainage systems. In addition, placing new structures within an existing floodplain can impede flood waters, altering the flood risks both upstream and downstream.

In areas of San Joaquin County where soils have naturally low permeability and are subject to quick saturation, high rain volumes remain on the surface as runoff, and can cause flash flooding. When impervious surfaces such as highways are placed within these areas of an existing flood plain the public is exposed to the hazards of flash flooding.

The highway and arterial projects proposed in the 2018 RTP/SCS generally include widening existing highways, constructing new interchanges, new highway segments, and new rail lines. Some of the proposed transit projects would involve construction of new rail lines, new stations, and upgrades to existing stations, and are not included in the calculation of approximately 256 new lane miles.

Placing new structures within an existing floodplain can impede flood waters, altering the flood risks both upstream and downstream. The flooding risks associated with projects located in flood zones can be modified with appropriate design and alignment considerations. The amount of new urbanized acreage (consuming previously vacant land) would be on the order of 18,123 acres. The

additional urbanized acreage expected by 2042 could increase stormwater runoff and therefore require mitigation.

The impacts associated with land use changes and transportation projects from the implementation of the proposed 2018 RTP/SCS are considered potentially significant but mitigable.

## **Mitigation Measures**

For transportation projects under their jurisdiction, SJCOG shall implement, and transportation project sponsor agencies can and should implement, the following mitigation measure developed for the 2018 RTP/SCS program where applicable for transportation projects that would be exposed to flood hazards. Municipalities in the SJCOG region can and should implement this measure, where relevant to land use projects implementing the 2018 RTP/SCS.

### *W-3(a) Project-Specific Hydrology Studies*

Project sponsors conduct or require project-specific hydrology studies for projects proposed to be constructed within floodplains to demonstrate compliance with applicable federal, state, and local agency flood-control regulations. These studies should identify project design features or mitigation measures that reduce impacts to either floodplains or flood flows to a less than significant level. For the purposes of this mitigation, less than significant means consistent with federal, state, and local regulations and laws related to development in the floodplain.

### *W-3(b) Development In Flood Hazard Areas*

Project sponsors shall, to the extent feasible and appropriate, prevent development in flood hazard areas that do not have appropriate protections.

### *W-3(c) Elevated Structures In Flood Zones*

If a 2018 RTP/SCS project is in an area with high flooding potential, project sponsors shall ensure that the structure is elevated at least one foot above the 100-year flood zone elevation and that bank stabilization and erosion control measures are implemented along creek crossings, where applicable.

## **Significance After Mitigation**

If the project sponsor adopts these mitigation measures, impacts would be reduced, although not to a level of less than significant in all cases. Because this document evaluates impacts at the programmatic level, all project circumstances are not foreseeable and therefore, even with implementation of Mitigation Measures W-3(a) through W-3(c), impacts could remain significant and unavoidable. As appropriate, SJCOG will encourage lead agencies to adopt these mitigation measures through its Intergovernmental Review process. With adoption of these mitigation measures, this impact would be significant but mitigable.

# TERRA LAND GROUP, LLC

April 5, 2018

## Letter 5.2

VIA EMAIL

San Joaquin County Council of Governments  
Attn: Kim Anderson  
555 East Weber Avenue  
Stockton, CA 95202  
(sjcog.rtp@gmail.com)

**Re: March 2018 Regional Transportation Plan/Sustainable Communities Strategy Draft  
Programmatic Environmental Impact Report: Public Comments (LETTER #2).**

Dear Project Team,

My name is Martin Harris and I am an authorized representative for Terra Land Group, LLC ("TLG"). At this time, TLG is in receipt of the March 2018 Regional Transportation Plan/Sustainable Communities Strategy Draft Programmatic Environmental Impact Report ("RTP/SCS"). TLG presents the following responses to the RTP/SCS with the hope that the public concerns detailed in this letter will be carefully considered by the San Joaquin Council of Governments Board Members and staff prior to making any decision affecting the Highway 99/Austin Road interchange.

Table 6-1 of Appendix B as described in the RTP/SCS details State Highway 99/120 operational improvements that may lead to the elimination of off-ramps and on-ramps to and from Austin Road. TLG believes this may result in very significant traffic circulation congestion and emergency services response delays to the areas affected.

For this reason, TLG believes that it is imperative that all on-ramps and off-ramps connecting Austin Road to State Highway 99/120 are incorporated into any reconstruction plans being considered and continue to operate in an effective manner.

Thank you for your consideration of this very important matter.

Respectfully,



Martin Harris  
for Terra Land Group, LLC

MH/cm

5151 E. ALMONDWOOD DRIVE MANTECA, CA 95337

# TERRA LAND GROUP, LLC

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Enclosure:

1. Table 6-1 of Appendix B as taken from the March 2018 Regional Transportation Plan/Sustainable Communities Strategy Draft Programmatic Environmental Impact Report.

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5151 E. ALMONDWOOD DRIVE MANTECA, CA 95337

# Appendix B

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2018 RTP/SCS Transportation Project List

Table 6-1: 2018 Regional Transportation Plan Project List - Mainline Highway Improvements Category

Identifiers		Project Information		Facility Name/Route		Project Limits		Cost to Deliver		Milestone Years							
2018 RTP MPO ID	CTIPS ID #	PPNO	Jurisdiction	Project Description	Project Limits	Cost to Deliver	Total	FTIP Programming	NEPA Approval	Open to Traffic	MK Renewal Project	RTIF Project	FTIP Programming	NEPA Approval	Open to Traffic	MK Renewal Project	RTIF Project
SJ14-1004	212-0000-0665		Caltrans	SR 99/120 Operational Improvements Construct a second lane on the SR 99 NB Off-ramp/SR-120 WB On-Ramp and on the SR-120 EB off-ramp/SR-99 SB On-Ramp. Reconstruct Austin Road Overcrossing. Widen SR-120 from 4 lanes to 6 between Main Street and SR-99. Construct auxiliary lanes on SR-99 between SR-120 and Olive Avenue.	On SR-120 from Main Street (P.M. 5.13) to SR-99 and on SR-99 from SR-120 to Olive Avenue (P.M. 6.22)	\$76,711,000		2015	2018	2023	X						
SJ07-1003			Caltrans	I-205 HOV	Widen from 6 to 8 lanes (inside/outside)	Alameda County Line to Eleventh Street	\$95,874,000						2020	2026		X	
SJ14-1001			Caltrans	I-205 HOV	Widen from 6 to 8 lanes (inside/outside)	Eleventh Street to MacArthur Drive	\$102,000,000						2020	2026		X	X
SJ14-1002			Caltrans	I-205 HOV	Widen from 6 to 8 lanes (inside/outside)	MacArthur Drive to I-5	\$100,000,000						2020	2026		X	
SJ07-1008			Caltrans	I-5 HOV Mossdale	Widen to add HOV lanes with HOV Connector Ramps to I-205 and SR-120	I-205 to Louise Avenue (P.M. 12.5/R 16.5)	\$207,970,000						2022	2028		X	X
SJ07-1014			Caltrans	SR-120	Widen 4 to 6 lanes (inside)	I-5 to Main Street (P.M. 5.13)	\$95,191,000						2024	2030		X	
SJ18-1001			Caltrans	SR-99 HOV	Widen 6 to 8 lanes (inside/outside), including reconstruction of SR-99/Main Street and SR-99/Wilma Avenue interchanges and pedestrian overcrossing	SR-120 to Stanislaus County Line	\$200,000,000						2026	2032			
SJ11-1001			Caltrans	I-5 HOV	Widen from 6 to 8 lanes (inside median) including auxiliary lanes	Hammer Lane to North of Eight Mile Road	\$124,620,000						2009	2036		X	
SJ07-1005			Caltrans	I-5 HOV	Widen 6 to 8 lanes (inside)	French Camp Road to Charter Way	\$97,880,000						2030	2038		X	
SJ07-1006			Caltrans	I-5 HOV	Widen 6 to 8 lanes (inside)	Louise Avenue to French Camp Road	\$193,880,000						2032	2040		X	
SJ14-1003			Caltrans	SR-99 Widening	Widen 4 to 6 lanes (inside) - ENVIRONMENTAL ONLY	Harney Lane to Turner Road	\$3,000,000										
							<b>\$1,297,126,000</b>										

April 5, 2018

**Letter 5.3**

VIA EMAIL

San Joaquin County Council of Governments  
Attn: Kim Anderson  
555 East Weber Avenue  
Stockton, CA 95202  
(sjcog.rtp@gmail.com)

**Re: March 2018 Regional Transportation Plan/Sustainable Communities Strategy Draft  
Programmatic Environmental Impact Report: Public Comments.**

Dear Project Team,

My name is Martin Harris and I am an authorized representative for W/L Harris Properties, LLC ("WLHP"). At this time, WLHP is in receipt of the March 2018 Regional Transportation Plan/Sustainable Communities Strategy Draft Programmatic Environmental Impact Report ("RTP/SCS"). WLHP presents the following responses to the RTP/SCS with the hope that the public concerns detailed in this letter will be carefully considered by the San Joaquin Council of Governments Board Members and staff prior to making any decision affecting the Highway 120/Guthmiller Road interchange.

Table 6-2 of Appendix B as described in the RTP/SCS details State Highway 120 operational improvements that may lead to the elimination of off-ramps and on-ramps to and from Guthmiller Road. WLHP believes this may result in very significant traffic circulation congestion and emergency services response delays to the areas affected.

For this reason, WLHP believes that it is imperative that all on-ramps and off-ramps connecting Guthmiller Road to State Highway 120 are incorporated into any reconstruction plans being considered and continue to operate in an effective manner.

Thank you for your consideration of this very important matter.

Respectfully,



Martin Harris  
for W/L Harris Ranches, LLC

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*W/L Harris Properties, LLC*

5151 E. Almondwood Drive, Manteca, CA 95337

Tel. (209) 239-1361 Fax (209) 239-7086

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MH/cm

Enclosure:

1. Table 6-2 of Appendix B as taken from the March 2018 Regional Transportation Plan/Sustainable Communities Strategy Draft Programmatic Environmental Impact Report.

# Appendix B

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2018 RTP/SCS Transportation Project List

**Table 6-2: 2018 Regional Transportation Plan Project List - Interchange Improvements Category**

Identifiers	2018 RTP MPO ID	CTIPS ID #	PPNO	Project Information			Project Description	Project Limits	Cost to Deliver	Total	Milestone Years					
				Jurisdiction	Facility Name/Route						FTIP Programming	NEPA Approval	Open to Traffic	MK Renewal Project	RTIP Project	
SJ07-2005				Lathrop	I-5 at Louise Avenue		Reconstruct interchange (PM 16.4-16.8)	I-5 at Louise Avenue	\$28,754,000			2024	2030	X		
SJ07-2004				Lathrop	I-5 at Lathrop Road		Reconstruct interchange (P.M. 17.3/17.8)	I-5 at Lathrop Road	\$39,146,000			2029	2033	X		
							Relocation of intersection at Roth/Harlan Road inclusive of signalization; relocation of intersection at Roth/Manthey Road inclusive of signalization. Widen from 2 to 5 lanes from Roth/Harlan road intersection to Roth/Manthey Road Intersection									
SJ11-3066				Lathrop	I-5 at Roth Road		Reconstruct interchange - SR 120 at Yosemite Ave/Guthmiller Road	I-5 at Roth Road	\$16,800,000				2020			
SJ14-2004				Lathrop	SR 120 at Yosemite Ave/Guthmiller Road		<b>ENVIRONMENTAL ONLY</b>	SR 120 at Yosemite Ave/Guthmiller Road	\$3,000,000							
SJ11-2015				Lodi	SR-99 at SR-12 West (Kettleman Lane)		Reconstruct interchange and widen to free flowing interchange	SR-99 at SR-12 West (Kettleman Lane)	\$50,000,000			2030	2036	X		
							Reconstruct interchange to provide 6 through lanes on SR 99, 4 lanes on Harney between Reynolds Ranch Pkwy and SR 99 and modify on-ramps and off-ramps									
SJ07-2006				Lodi	SR-99 at Harney Lane		Reconstruct interchange to provide operational and safety improvements on SR 99 at Turner Road (PM 31.3/31.6)	SR-99 at Harney Lane	\$35,362,000			2009	2028	2033	X	
SJ07-1020	112-0000-0347			Lodi	SR-99 at Turner Road		Reconstruct interchange (P.M. 4.1/4.1)	SR-99 at Turner Road	\$6,142,986			2019	2036	2041	X	
SJ07-2012				Manteca	SR-120 at Union Road		Construct new interchange	SR-120 at Union Road	\$22,000,000					2021	X	
SJ07-2009	212-0000-0231			Manteca	SR-120 at McKinley Ave		Reconstruct interchange	SR-120 at McKinley Avenue	\$37,850,000			2009	2014	2022	X	X
SJ18-2001				Manteca	SR-120 at Airport Way		Reconstruct interchange	SR-120 at Airport Way	\$36,828,000				2029	2031	X	
SJ18-2002				Manteca	SR-120 at Main Street		Reconstruct interchange	SR-120 at Main Street	\$36,828,000				2031	2033	X	
SJ14-2001				Manteca	SR-99 at Raymus Expressway		Construction of new interchange - <b>ENVIRONMENTAL ONLY</b>	SR-99 at Raymus Expressway	\$3,000,000						X	X
							Interchange Modification and auxiliary lanes (PM 32.6)									
SJ11-2004	212-0000-0309			Stockton	I-5 at Hammer Lane		Construction of a new interchange and auxiliary lanes (PM 33.3/34.2)	I-5 at Hammer Lane	\$47,164,647			2007	2009	2036		
SJ11-2006	212-0000-0309			Stockton	I-5 at Otto Drive		Modification of interchange (P.M. 34.7/35.9)	I-5 at Otto Drive	\$103,371,218			2007	2009	2036		
SJ07-2020	212-0000-0309			Stockton	I-5 at Eight Mile Road		Reconstruct Interchange (PM 35.1-35.5)	I-5 at Eight Mile Road	\$57,255,179			2007	2009	2036		
SJ11-2002	212-0000-0562			Stockton	SR-99 at Eight Mile Road		Reconstruct interchange (PM 23.5-24.5)	SR-99 at Eight Mile Road	\$93,070,215				2030	2036	X	
SJ11-2001	212-0000-0561			Stockton	SR-99 at Morada		Construct Interchange I-205 at Eleventh street realign and widen Eleventh Street to 6-lanes north of Grant Line to Byron Road. Construct Aux lane Hansen to Eleventh; in WB I-205 Eleventh Street to Grant Line Road	SR-99 at Morada	\$96,474,024				2030	2036		
							Construct Interchange I-205 at Eleventh street realign and widen Eleventh Street to 6-lanes north of Grant Line to Byron Road. Construct Aux lane Hansen to Eleventh; in WB I-205 Eleventh Street to Grant Line Road	SR-99 at Morada								
SJ11-2010	212-0000-0227			Tracy	I-205/Lammers Rd/Eleventh St		Reconstruct interchange	I-205 at Mountain House Parkway	\$51,500,000			2007	2012	2022	X	
SJ14-2002				Tracy	I-580 at International Pkwy/Patterson Pass Road		Reconstruct interchange	I-205 at Mountain House Parkway	\$9,000,000			2015	2018	2021	X	
SJ14-2003				Tracy	I-205 at Mountain House/International Pkwy		Reconstruct interchange	I-205 at Mountain House Parkway	\$4,000,000			2015	2018	2021	X	X
SJ11-2011				Tracy	I-205 at Grant Line Road		Modification of existing interchange	I-205 at Grant Line Road	\$32,574,820				2018	2024		
SJ11-2012	212-0000-0228			Tracy	I-205 at Chrisman Rd		Phase 1: Construct new interchange east-west ramps	I-205 at Chrisman Rd	\$36,056,267			2009	2020	2026		
SJ18-2003				Tracy	I-205 / MacArthur		Modification of existing interchange - <b>ENVIRONMENTAL ONLY</b>	At MacArthur (PM 7.8 -PM 8.5)	\$9,670,000							
SJ11-2031				Tracy	I-580 at Corral Hollow Road		Modification of existing interchange - <b>ENVIRONMENTAL ONLY</b>	I-580 at Coral Hollow Road	\$5,500,000				2018			
SJ11-2032				Tracy	I-580 at Lammers Road		Construction of new interchange - <b>ENVIRONMENTAL ONLY</b>	I-580 at Lammers Road	\$5,500,000				2018			
									<b>\$866,847,355</b>							

# TERRA LAND GROUP, LLC

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April 9, 2018

## Letter 5.4

VIA EMAIL

San Joaquin County Council of Governments  
Attn: Kim Anderson  
555 East Weber Avenue  
Stockton, CA 95202  
(sjcog.rtp@gmail.com)

**Re: March 2018 Regional Transportation Plan/Sustainable Communities Strategy Draft  
Programmatic Environmental Impact Report: Public Comments (LETTER #3).**

Dear Project Team,

My name is Martin Harris and I am an authorized representative for Terra Land Group, LLC ("TLG"). TLG owns several properties located in the Lower San Joaquin River Basin that may benefit or be adversely affected as a result of various local, state, or federal government flood protection improvement actions currently being considered for future implementation.

On March 28, 2018, TLG submitted letters to:

1. San Joaquin County Assessor representative Jose Molina and San Joaquin County Surveyor Warren Smith; and
2. City of Manteca General Plan Advisory Committee ("GPAC") in association with the April 2, 2018 GPAC Meeting Agenda Item 4: General Plan Update: Transportation and Circulation Discussion, with Enclosures.

With this in mind, TLG believes that the information provided in these letters, which have been included in the Enclosures attached, clearly describe the potential for flood and other hydrology and non-hydrology related impacts that may be created in association with the Antone Raymus Expressway and other roadways being considered for construction along and through the flood-prone areas south of Manteca. (**See Enclosures**)

At this time, TLG requests that the public concerns detailed in this letter be considered in conjunction with the March 2018 Regional Transportation Plan/Sustainable Communities Strategy Draft Programmatic Environmental Impact Report public review and comment process.

Thank you for your consideration of this very important matter.

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5151 E. ALMONDWOOD DRIVE MANTECA, CA 95337

# TERRA LAND GROUP, LLC

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Respectfully,



Martin Harris  
for Terra Land Group, LLC

MH/cm

Enclosures:

*Please Note: To conserve file size, these Enclosures can be accessed and downloaded individually as needed through the corresponding Dropbox hyperlinks.*

1. March 28, 2018 letter from TLG to San Joaquin County Assessor representative Jose Molina and San Joaquin County Surveyor Warren Smith.  
([https://www.dropbox.com/s/5k1a6ntqcobldvr/2018-03-28\\_LTR\\_SJCAssessor-Surveyor\\_Boundary\\_Alignment.pdf?dl=0](https://www.dropbox.com/s/5k1a6ntqcobldvr/2018-03-28_LTR_SJCAssessor-Surveyor_Boundary_Alignment.pdf?dl=0))
2. March 28, 2018 letter from TLG to the City of Manteca General Plan Advisory Committee.  
([https://www.dropbox.com/s/kgw5y93x7vig11b/2018-03-28\\_LTR\\_MGPAC\\_Aglt4.pdf?dl=0](https://www.dropbox.com/s/kgw5y93x7vig11b/2018-03-28_LTR_MGPAC_Aglt4.pdf?dl=0))

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5151 E. ALMONDWOOD DRIVE MANTECA, CA 95337

TERRA LAND GROUP, LLC

RECEIVED  
APR 26 2018

Letter 5.5

April 24, 2018

San Joaquin  
Council of Governments

DK

ENCLOSURE ADVICE

SJCOG, Inc. Board Members  
555 E. Weber Ave.  
Stockton, CA 95202-2804

Enclosed please find a copy of a letter dated April 24, 2018 from Terra Land Group to the SJCOG, Inc. Board Members with Enclosures:

**Re: April 26, 2018 Joint Meeting of the Board of Directors for SJCOG and SJCOG, Inc. in Relation to the April 26, 2018 Meeting Agenda Item 5D: SJCOG - 2018 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) Public Hearing.**

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A digital version of this letter with Enclosures has been provided on the enclosed CD.

Thank you,

Martin Harris  
Terra Land Group  
(terralandgroup@gmail.com)

# TERRA LAND GROUP, LLC

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April 24, 2018

VIA EMAIL & U.S. MAIL

San Joaquin Council of Governments  
555 E Weber Avenue  
Stockton, CA 95202-2804  
% Diane Nguyen  
(nguyen@sjcog.org)

SJCOG, Inc. Board Members  
555 E. Weber Ave.  
Stockton, CA 95202-2804

**Re: April 26, 2018 Joint Meeting of the Board of Directors for SJCOG and SJCOG, Inc. in Relation to the April 26, 2018 Meeting Agenda Item 5D: SJCOG - 2018 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) Public Hearing.**

Dear Board Members,

My name is Martin Harris and I am an authorized representative for Terra Land Group, LLC ("TLG"). TLG owns several properties located in Manteca and Lathrop. As an organization, TLG devotes many of its efforts to ensuring the safety of our community by urging local and state authorities to pursue flood mitigation efforts when moving forward with new development projects.

As recent flooding in Houston, Texas has demonstrated, unrestrained development without consideration for flood impacts can have serious consequences. In particular, as more and more development projects continue to move forward, TLG has put forth a regular effort to ensure that local authorities are aware of the need for cumulative environmental review and analysis of all hydrology-related impacts associated with all currently existing and foreseeable development projects affecting drainage in and along the Lower San Joaquin River Basin and especially the areas affecting the urban and rural areas of Manteca and Lathrop.

With that in mind, TLG presents information in the form of TLG's public review and comments submitted in response to the recently released January 2018 San Joaquin River Basin Lower San Joaquin River, CA FINAL Integrated Interim Feasibility Report/Environmental Impact Statement/Environmental Impact Report ("LSJRFS"). (See Enclosure 1)

For some time now, TLG has sent various copies of our letters to the San Joaquin Council of Governments ("SJCOG") and other authorities expressing public concerns related to development in the floodplain and the need to examine any potential impacts related to San Joaquin River (and tributary) flow deficiencies and the potential for upstream and downstream channel flow stage

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5151 E. ALMONDWOOD DRIVE MANTECA, CA 95337

# TERRA LAND GROUP, LLC

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increases due to drainage patterns affected by grade, levee location, and other environmental considerations. (See **Enclosure 1** which contains a list of letters and related items in its own Enclosure 1. This list contains information that TLG believes is important to consider in the decision-making process. Also See **Enclosures 2 & 3**)

In brief, the enclosures attached describe recently discovered information as detailed in letters from TLG to various agencies that may affect flood control in the Reclamation District No. 17 ("RD 17") and Manteca/Lathrop region. These letters provide supporting evidence while building an overall context and framework for TLG's and other members of the public's concerns regarding any current and/or future development projects that continue to be approved with the potential to affect hydrology in the urban and rural areas of Lathrop and Manteca. The significant details contained in the enclosed letters offer a framework which leads TLG to believe that the complex nature of the potential flood issues involved may be too difficult for the public to adequately understand without the benefit of a comprehensive and cumulative CEQA and NEPA Environmental Review and Analysis.

Further, TLG believes that it is important to mention that the LSJRFS may not fully consider the potential for any and all flood and other hydrology related impacts involved due to RD 17's plan to pursue a phased strategy of levee improvements and other Federally assisted improvements in order to meet California Senate Bill No. 5 ("SB5") requirements. (See page 3-40 of the LSJRFS).

This is especially important when you consider that Page 3-42 of the LSJRFS states:

*The identification of Alternative 7a as the NED Plan serves to set the level of Federal participation in the project. Alternative 7a may not fully meet the NFS objective of SB 5 compliance, but in order to expedite authorization, the NFS elected not to pursue a Locally Preferred Plan (LPP) at this time.*

**QUESTION:** What non-federal sponsor elected not to pursue a Locally Preferred Plan at this time? Is it in the public's best interest to allow a non-federal sponsor to pursue any flood risk management plan that places emphasis on expediting the process over taking the time to consider and mitigate against the potential for very significant drainage impacts affecting the developing and non-developing urban and rural areas of Manteca and Lathrop?

Most concerning is TLG's belief that it is the intent of local authorities to assign a project sponsor to seek Section 408 approval from the U.S. Army Corps of Engineers allowing expansion and/or relocation of the RD 17 dry land cross levee system to a location south of the point that Paradise Cut and the San Joaquin River converge. (See **Enclosure 1**)

It is in this way that TLG believes our local authorities intend to move forward with plans to gain the approvals necessary to construct critical but currently unidentified public services infrastructure supporting:

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5 151 E. ALMONDWOOD DRIVE MANTECA, CA 95337

# TERRA LAND GROUP, LLC

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- (i) Storm water drainage,
- (ii) Disinfected and undisinfectated effluent wastewater spray field discharge,
- (iii) Groundwater sustainability through percolation and recharges, and
- (iv) Traffic circulation

as well as any and all SB5 flood protection and drainage improvements necessary to accommodate the rapid pace of development affecting both the urban and rural developing and non-developing areas of our local communities.

For this reason, TLG urges SJCOG and the SJCOG, Inc. Board Members to take any action allowed under its authority to require additional environmental impact study and analysis that fully evaluates SPFC and non-SPFC flood protection levee impacts and improvements necessary for Reclamation District Nos. 17, 2094, 2075, 2085, 2096, and 2064 in conjunction with any and all SB5 or other flood protection related modifications (including relocation, extension, or expansion) to the RD 17 levee system to be considered. **(See Enclosures 1-3)** As a result of acting in this manner, SJCOG and the SJCOG, Inc. Board Members can serve the best interests of the public by promoting a higher level of flood protection for the entire RD 17 drainage system area (ie. this includes RDs 2064, 2075, 2094, & 2096). Most important, this effort shall offer the necessary protections and allow appropriate mitigation measures to be identified and put in place to ensure the reduction of any impacts associated with any and all flood protection alternatives being considered for all developing and non-developing urban and rural properties that may be affected.

Thank you for your attention to this matter.

Respectfully,



Martin Harris  
for Terra Land Group, LLC.

MH/cm

Enclosures:

*To conserve file space, these Enclosures can be accessed and downloaded individually through the corresponding Dropbox hyperlinks.*

1. February 26, 2018 letter from TLG to San Joaquin Area Flood Control Agency.  
([https://www.dropbox.com/s/8scnhemfwexbkr9/2018-02-26\\_LTR\\_SJAFCA\\_LSJR%20EIR\\_Public\\_Comm\\_wEncl.pdf?dl=0](https://www.dropbox.com/s/8scnhemfwexbkr9/2018-02-26_LTR_SJAFCA_LSJR%20EIR_Public_Comm_wEncl.pdf?dl=0))
2. March 5, 2018 letter from TLG to the San Joaquin County Local Agency Formation Commission.  
([https://www.dropbox.com/s/tl0ir7soookd6ze/2018-03-05\\_LTR\\_SJAFCA\\_Letter2.pdf?dl=0](https://www.dropbox.com/s/tl0ir7soookd6ze/2018-03-05_LTR_SJAFCA_Letter2.pdf?dl=0))

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5151 E. ALMONDWOOD DRIVE MANTECA, CA 95337

# TERRA LAND GROUP, LLC

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3. March 28, 2018 letter from TLG to the San Joaquin Council of Governments Re: March 2018 Regional Transportation Plan/Sustainable Communities Strategy Draft Programmatic Environmental Impact Report: Public Comments (LETTER #1).  
([https://www.dropbox.com/s/zh6z7q38g799dky/2018-03-28\\_LTR\\_SJCOG\\_LTR1\\_RTPSCS.pdf?dl=0](https://www.dropbox.com/s/zh6z7q38g799dky/2018-03-28_LTR_SJCOG_LTR1_RTPSCS.pdf?dl=0))

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5151 E. ALMONDWOOD DRIVE MANTECA, CA 95337

## Letter 5

**COMMENTER:** Terra Land; W/L Harris Properties, LLC, Martin Harris

**DATE(S):** March 28, 2018; April 5, 2018 (x2); April 9, 2018; April 24, 2018

*Letter 5.1 – March 28, 2018*

### **Response 5.1**

The commenter states that more needs to be done to identify and mitigate any and all flood and other hydrology related impacts in support of reducing any impacts to less than significant levels. In addition, the commenter states that the proposed mitigation measures associated with the RTP/SCS transportation infrastructure projects may be inadequate in relation to the potential for significant flood impacts affecting rural areas south of Manteca.

See Global Response 3 for a discussion regarding mitigation measures that should be included for individual projects. See Global Response 4 for a discussion of flood related project specific impacts and implementation of the 2018 RTP/SCS.

*Letters 5.2 and 5.3 – March 28, 2018*

### **Response 5.2 and 5.3**

The commenter states they have provided comments with the hope that their concerns regarding traffic congestion and emergency response are considered by SJCOG Board Members and staff prior to making any decisions affecting the Highway 99/Austin Road Interchange and the Highway 120/Guthmiller Road Interchange.

See Global Response 3 for a discussion of the EIR's analysis of project specific impacts.

*Letter 5.4 – April 9, 2018*

### **Response 5.4**

The commenter states there is potential for flood and other hydrology and non-hydrology related impacts that would be created in association with the Antone Raymus Expressway and other roadways being considered for construction along and through flood-prone areas south of the City of Manteca.

See Global Response 4 for a discussion of flood related impacts and implementation of the 2018 RTP/SCS.

*Letter 5.5 – April 24, 2018*

### **Response 5.5**

This letter is a forwarded set of attachments of several previously submitted letters. The commenter states they have put forth efforts to ensure that local authorities are aware of the need for cumulative environmental review and analysis of all hydrology-related impacts associated with all currently existing and foreseeable specific development projects affected draining in and along the Lower San Joaquin River Basin and the areas affecting urban and rural areas of Manteca and Lathrop.

See Global Response 4 for a discussion of flood related impacts and implementation of the 2018 RTP/SCS.



KIM A

MIWOK United Auburn Indian Community  
MAIDU of the Auburn Rancheria

Letter 6.1

Gene Whitehouse  
Chairman

John L. Williams  
Vice Chairman

Calvin Moman  
Secretary

Jason Camp  
Treasurer

Gabe Cayton  
Council Member

March 26, 2018

Andrew T. Chesley  
San Joaquin Council of Governments  
555 E. Weber Avenue  
Stockton, CA 95202

RECEIVED  
APR 06 2018  
San Joaquin  
Council of Governments

Subject: 2018 Regional Transportation Plan/ Sustainable Communities Strategy for San Joaquin County

Dear Andrew T. Chesley,

Thank you for requesting information regarding the above referenced project. The United Auburn Indian Community (UAIC) of the Auburn Rancheria is comprised of Miwok and Southern Maidu (Nisenan) people whose tribal lands are within Placer County and whose service area includes El Dorado, Nevada, Placer, Sacramento, Sutter, and Yuba counties. The UAIC is concerned about development within its aboriginal territory that has potential to impact the lifeways, cultural sites, and landscapes that may be of sacred or ceremonial significance. We appreciate the opportunity to comment on this and other projects. The UAIC would like to consult on this project.

6.1.1

In order to ascertain whether the project could affect cultural resources that may be of importance to the UAIC, we would like to receive copies of any archaeological reports that are completed for the project. We also request copies of environmental documents for the proposed project so that we have the opportunity to comment on appropriate identification, assessment and mitigation related to cultural resources. Finally, we request and recommend that UAIC tribal representatives observe and participate in all cultural resource surveys. To assist in locating and identifying cultural resources, UAIC's Preservation Department offers a mapping, records and literature search services program. This program has been shown to assist project proponents in complying with applicable environmental protection laws and choosing the appropriate mitigation measures or form of environmental documentation during the planning process. If you are interested in the program, please let us know.

6.1.2

The UAIC's Preservation Committee would like to set up a meeting or site visit, and begin consulting on the proposed project. Based on the Preservation Committee's identification of cultural resources in and around your project area, the UAIC recommends that a tribal monitor be present during any ground disturbing activities. Thank you again for taking these matters into consideration, and for involving the UAIC early in the planning process. We look forward to reviewing the documents requested above and consulting on your project. Please contact Marcos Guerrero, Cultural Resources Manager, at (530) 883-2364 or by email at [mguerrero@auburnrancheria.com](mailto:mguerrero@auburnrancheria.com) if you have any questions.

Sincerely,

Gene Whitehouse,  
Chairman

CC: Marcos Guerrero, CRM  
Final Programmatic Environmental Impact Report  
Kim Anderson, Senior Regional Planner

**Letter 6.2**

SJCOG RTP/SCS &lt;sjcog.rtp@gmail.com&gt;

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**2018 Regional Transportation Plan/ Sustainable Communities Strategy for San Joaquin County**

---

**Cherilyn Neider** <cneider@auburnrancheria.com>

Mon, Mar 26, 2018 at 3:43 PM

To: "sjcog.rtp@gmail.com" &lt;sjcog.rtp@gmail.com&gt;

Cc: Matthew Moore &lt;mmoore@auburnrancheria.com&gt;, Marcos Guerrero &lt;mguerrero@auburnrancheria.com&gt;

Hello Andrew T. Chesley and Kim Anderson,

Thank you for your letter regarding the 2018 Regional Transportation Plan/ Sustainable Communities Strategy for San Joaquin County. I am contacting you in order to request:

- All existing cultural resource assessments, as well as requests for and results of, any records searches that may have been conducted
- GIS SHP files for the proposed project's APE
- A copy of the draft 2018 RTP/SCS

6.2.1

Attached you will find mitigation measures recommended for incorporation into the project document. These measures address: avoidance of tribal cultural resources, worker awareness training for tribal cultural resources, tribal monitors in culturally sensitive sites and appropriate and respectful treatment of inadvertent discoveries.

Thank you for involving UAIC in the planning process at an early stage. We ask that you make this correspondence a part of the project record and we look forward to working with you to ensure that tribal cultural resources are protected.

Thank you,

**Cherilyn Neider**

Administrative Assistant

Tribal Historic Preservation

United Auburn Indian Community

[530.883.2394](tel:530.883.2394)

Nothing in this e-mail is intended to constitute an electronic signature for purposes of the Electronic Signatures in Global and National Commerce Act (E-Sign Act), 15, U.S.C. §§ 7001 to 7006 or the Uniform Electronic Transactions Act of any state or the federal government unless a specific statement to the contrary is included in this e-mail.

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**4 attachments**

 **5\_Mitigation\_Measures\_CEQA\_Construction\_Worker\_Awareness\_Training.docx**  
22K

 **1\_Mitigation\_Measures\_CEQA\_TCR\_Avoidance.docx**  
24K

 **2\_Mitigation\_Measures\_CEQA\_NativeAmericanMonitors.docx**  
22K

 **3\_Mitigation\_Measures\_CEQA\_Discoveries.docx**  
22K

## Letter 6

**COMMENTER:** United Auburn Indian Community, Gene Whitehouse, Chairman  
United Auburn Indian Community, Cherilyn Neider, Administrative Assistant

**DATE(S):** March 26, 2018

*Letter 6.1 – Gene Whitehouse*

### Response 6.1.1

The commenter, on behalf of the United Auburn Indian Community (UAIC) of the Auburn Rancheria, states their concern that development of the 2018 RTP/SCS has the potential to impact the lifeways, cultural sites, and landscapes that may be of sacred or ceremonial significance to the Miwok and Southern Maidu people. The commenter states they would like to initiate consultation on the project.

As discussed in Section 4.15, *Tribal Cultural Resources*, of the DEIR, Assembly Bill 52 establishes a formal consultation process for California tribes regarding those resources. The consultation process must be completed before a CEQA document can be certified. AB 52 requires that lead agencies “begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project.” Native American tribes to be included in the process are those that have requested notice of projects proposed within the jurisdiction of the lead agency.

UAIC was not included in the AB 52 letters that San Joaquin Council of Governments sent in March of 2017. SJCOG fulfilled AB 52 obligations by contacting the tribes who had requested to be included on their AB 52 consultation list. UAIC can be added to SJCOG’s AB 52 consultation list for notification on future projects upon UAIC making such a request. SJCOG is also available for consultation with UAIC on any of the specific projects listed in the RTP upon request. Further, the DEIR includes Mitigation Measure TCR-1 for Impact TCR-1, which would minimize impacts to potential tribal cultural resources in the SJCOG region through methods including but not limited to, project-specific AB 52 consultation. As discussed in the DEIR, with implementation of Mitigation Measure TCR-1, impacts would be less than significant and therefore, do not require additional mitigation.

### Response 6.1.2

The commenter states they would like to participate in all cultural resource surveys, receive copies of archaeological reports, set up a site visit/meeting, and that a tribal monitor should be present during any ground disturbing activities.

Due to the programmatic nature of the analysis prepared for this EIR, record searches were not conducted as part of this project. See Global Response 3 for a discussion of project specific impacts. For future project level analyses, as mentioned in Response 6.1,1, UAIC would have the opportunity to engage in AB 52 consultation, which may result in the requested participatory activities referenced by the commenter. Comment noted.

### Response 6.2.1

The commenter requests all existing cultural resource assessments, requests and results of, associated record searches, GIS SHP files for the proposed projects area of potential effects (APE), and a copy of the Draft 2018 RTP/SCS. In addition, the commenter includes recommended mitigation measures for tribal cultural resources to include in the DEIR.

As discussed in Response 6.1.1 of this FEIR, and Section 4.15, *Tribal Cultural Resources*, of the DEIR, mitigation measure TCR-1 reduces impacts pertaining to tribal cultural resources through adherence to AB 52 consultation requirements. Further, the commenter’s recommended mitigation measures are project specific and do not apply to the scope of this programmatic EIR; therefore, see Global Response 3 for a discussion of project specific mitigation measures.

# Letter 7

April 4, 2018

Thank you Council Members and Staff

I have taken the opportunity to read the 2018 Draft Plan and EIR. I found it most interesting and informative.

What I didn't find was the checks and balances how either documents addressed Environmental impacts and mitigations prior to approval for funding.

Once a local agency submits a project for funding, at what point during consideration is the local agency to make SJCOG aware of the Environmental impacts associated with the request and include the monies for mitigation in its request? 1

For instance, a residential street is approved by resolution and designated a truck route with the intent to later request a STAA route as worded in the resolution. Years later, the decision to widen the road to four lanes is made and the funding process is started. Once the funding is secured the local agency changes the design of the road causing adverse impacts to the residents with only a Mitigated Negative Declaration. This document does not mention mitigation to protect the minority and low income residents impacted by the noise, emissions, safety issues and the 500 feet setback mandated for a heavily traveled truck arterial street. 2

Is there a safe guard in the current funding process that insures the amount of the request includes monies to address and earmark funds to mitigate the impacts of the project?

I think a solution would be beneficial to both lead agency and the residents. SJCOG should notify the residents of the request funding the project which will impact their property. Once the impacts are identified, the lead agency and SJCOG can make the adjustments to the funding amount to insure the mitigation costs are included. 3

Thank You,

Mary Meninga

915 W. Lathrop Road

Lathrop, CA 95336

## Letter 7

**COMMENTER:** Mary Meninga

**DATE:** April 4, 2018

### Response 7.1

See Global Response 1.

### Response 7.2

The commenter states that the EIR does not include mitigation for minority and low income residents, regarding noise, air quality emissions, and safety impacts, as well as a 500-foot setback for a heavily traveled truck arterial street.

The DEIR includes mitigation measures for all significantly affected residents, which includes minority and low income residents (e.g. Mitigation Measure AQ-4: Health Risk Reduction Measures). The 2018 RTP/SCS identified environmental justice communities based on socio-economic criteria. Impacts to these communities are discussed in Section 4.7, *Environmental Justice*. As discussed, the transportation improvement projects and future land use scenario envisioned by the 2018 RTP/SCS has the potential to result in the emission of air quality pollutants, generate substantial noise, and result in temporary traffic impacts, the impacts of which are each discussed in their respective EIR impact sections. Although the 2018 RTP/SCS would result in these impacts, as discussed, the impacts would not disproportionately affect minority or low income communities. Environmental impacts to households within 500 feet of a major highway are analyzed on Page 199 of the DEIR, and as discussed, the 2018 RTP/SCS would not disproportionately result in environmental justice communities exposed to emissions associated with major transportation facilities, and impacts would be less than significant. As impacts would be less than significant, no mitigation is required.

### Response 7.3

See Global Responses 1 and 2, which discuss the selection process of RTP projects, and the funding/timing of mitigation measures.

Letter 8

April 4, 2018

Hello my name is Adriana Lopez. Ms. Meninga and I attended the outreach meeting and submitted our comments and questions a year ago prior to the Lathrop Road Widening Project in the City of Lathrop. Numerous times we came before City Council with safety and environmental issues. We were told that all safety issues would be addressed prior to construction. As of today that has not happened. We asked numerous times if Lathrop Road would be designated a STAA route. We were told no, that is was not the intent. It wasn't until we found the information in SJCOG's documents showing a map of the proposed STAA route on Lathrop Road and the information that Mr. Gebhardt was in agreement with the goods movement task force to slate Lathrop Road from I-5 to Airport Way a STAA route. Yet in public meetings he stated the contrary. There has been nothing but a lack of transparency from the City of Lathrop. Piece milling, using decade old environmental reports or using a Mitigated Negative Declaration (MND) in lieu of an up to date environmental report has stripped us of our quality of life and the sense of well-being by placing us in harm's way. A regional project should not have allowed this to happen.

I am aware that it's the local agencies job to insure specific projects are done properly. However, without the checks and balances this is what happens. In my case, my neighbors were not given prior notice. I was notified about a strip of my property that was needed otherwise I would have not known. Allowing a project to go forward with a resolution by having 3 residents' signatures is not proper notification. Since the Lathrop Road widening project has been completed, we now are experiencing blocked access to our homes, must travel more than a half mile out of the way to access our property, forced to back out on

1

to oncoming truck traffic and denied a street parking lane that we used as a deceleration lane to ingress and egress safely. Do to the lack of law enforcement, illegal STAA trucks are allowed to travel in a residential area and exceed the speed limits within 25 feet of our homes. Noise, vibrations and emissions are negatively impacting our health and quality of our lives. I must mention there are land disputes currently under investigation because the properties involved were not surveyed prior to construction.

↑  
1 Cont.

I would like to be insured that this environmental impact report include impacts and mitigations of the proposed STAA route in front of our homes from I-5 to Hwy 99 and the I-5 Lathrop Road interchange. Particularly mitigations to protect the hundreds of children that have no other option but to walk under the I-5 Lathrop Road interchange to attend Lathrop High School. If this project is approved, what will be the alternative route to school during construction? Will there be a walk over included in the proposed project? Upon full build out of a STAA route from I-5 to 99 via Lathrop Road how will the residents that abut Lathrop Road be notified early in the process to address their concerns? We cannot leave it to the local agencies as it is proposed as a regional project. I would hope that this environmental document would include the human factor and show impacts and mitigations necessary for our safety.

2

Thank you,

Adriana Lopez

546 E. Lathrop Road

Lathrop, CA 95330

## Letter 8

**COMMENTER:** Adriana Lopez

**DATE:** April 4, 2018

### **Response 8.1**

See Global Responses 1 and 2 which discuss the selection process of RTP projects, and the funding/timing of mitigation measures.

### **Response 8.2**

See Global Response 2.



Letter 9

SJCOG RTP/SCS <sjcog.rtp@gmail.com>

**comments**

2 messages

**Mary Elizabeth** <mebeth@outlook.com>  
To: "sjcog.rtp@gmail.com" <sjcog.rtp@gmail.com>

Mon, Apr 23, 2018 at 6:18 PM

Stormwater Flooding Mitigation statement

MPACT W-5 IMPLEMENTATION OF PROPOSED TRANSPORTATION IMPROVEMENTS AND FUTURE PROJECTS FACILITATED BY THE LAND USE SCENARIO ENVISIONED IN THE 2018 RTP/SCS WOULD INCREMENTALLY INCREASE STORMWATER FLOWS IN THE SJCOG REGION. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Implementation of proposed transportation improvements and future projects facilitated by the land use scenario envisioned in the 2018 RTP/SCS may increase stormwater flows, resulting in increased volume and/or velocity of stormwater runoff. Potential increases in stormwater volume and/or velocity could result in on- or off-site flooding. However, planned transportation projects would be designed to comply with existing jurisdiction requirements related to stormwater runoff and drainages, such as curb and gutter design, and would build drainage infrastructure to control and accommodate the increase in stormwater flows. Therefore, impacts would be less than significant.

1

Given our overdrafted groundwater basin specific efforts should be made when any pavement or drainage re-routing project is undertaken to include infiltration basins and/or soil development practices that increase percolation rates to help with groundwater recharge and reduce flooding impacts.

2

Efforts should be directed to increase bicycle parking facilities throughout our county. This is cheap and the most frequent reason given for not biking to do errands is that there are not safe places to lock bikes.

3

Thank you.

Mary Elizabeth

**SJCOG RTP/SCS** <sjcog.rtp@gmail.com>  
To: Mary Elizabeth <mebeth@outlook.com>

Wed, Apr 25, 2018 at 6:13 PM

Ms. Elizabeth,

Your comments on the Draft 2018 RTP/SCS and Draft Programmatic EIR have been received. Your comments will be reviewed carefully and a formal response to your comments will be provided prior to consideration of the documents for adoption, currently anticipated for June 26, 2018. Thank-you for taking the time to review the documents and provide input.

Sincerely,

**Kim Anderson**  
**Senior Regional Planner**  
**San Joaquin Council of Governments**

5/2/2018

Gmail - comments

*Stockton, CA 95202  
anderson@sjcog.org*

*Phone:  
Direct: 209.235.0565  
Main: 209.235.0600  
Fax: 209.235-0438*

[Quoted text hidden]



Letter 9

SJCOG RTP/SCS <sjcog.rtp@gmail.com>

**comments**

2 messages

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To: "sjcog.rtp@gmail.com" <sjcog.rtp@gmail.com>

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1

Given our overdrafted groundwater basin specific efforts should be made when any pavement or drainage re-routing project is undertaken to include infiltration basins and/or soil development practices that increase percolation rates to help with groundwater recharge and reduce flooding impacts.

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Efforts should be directed to increase bicycle parking facilities throughout our county. This is cheap and the most frequent reason given for not biking to do errands is that there are not safe places to lock bikes.

3

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Mary Elizabeth

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To: Mary Elizabeth <mebeth@outlook.com>

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Sincerely,

**Kim Anderson**  
**Senior Regional Planner**  
**San Joaquin Council of Governments**

[555 E Weber Ave](#) Final Programmatic Environmental Impact Report

5/2/2018

Gmail - comments

*Stockton, CA 95202  
anderson@sjcog.org*

*Phone:  
Direct: 209.235.0565  
Main: 209.235.0600  
Fax: 209.235-0438*

[Quoted text hidden]

## Letter 9

**COMMENTER:** Mary Elizabeth

**DATE:** April 23, 2018

### Response 9.1

See Global Response 1.

### Response 9.2

The commenter states that efforts should be made to include methods that increase percolation rates to help increase groundwater recharge and reduce flooding impacts.

As discussed in Global Response 4, during project design and development review, individual transportation and land development projects would be required by project sponsors to assess potential hydrologic impacts, which include the assessment of stormwater runoff, and development in identified flood hazard areas. Individual project sponsor agencies would be required to address stormwater runoff for individual projects on a project-by-project basis, through adherence to Post Construction Requirements (PCR's) established by the State Water Resources Board. These requirements would be addressed at a project level analysis when individual projects apply for coverage for discharge under the SWRCB Construction General Permit, which further requires that individual discharges replicate pre-project runoff water balance post project completion (SWRCB 2009-0009-DWQ Construction General Permit). As described in Section 4.11, *Hydrology and Water Quality*, the 2018 RTP/SCS contains project actions that would potentially reduce groundwater recharge due to the increase in impermeable surfaces. This impact was identified as significant and unavoidable, and Mitigation Measures W-2(a) through W-2(g) include methods to aid and facilitate groundwater recharge, and reduce the amount of hardscapes and impervious surfaces. As discussed, these mitigation measures would reduce impacts.

### Response 9.3

The commenter states that efforts should be directed to increase bicycle parking facilities throughout San Joaquin County. This comment does not pertain to the analysis of the DEIR, or raise any issues regarding the CEQA component of this project. Comment noted and has been forwarded to the decision makers for consideration.

Letter 10

April 26, 2018  
Comments to the Draft EIR

Good afternoon,  
My name is Mary Meninga and I reside at [915 W. Lathrop](#) in Manteca. We have summited our concerns and questions for the plan and draft EIR both written and orally at previous public hearings in Lathrop. We are assured the Final EIR will address our concerns and answer our question. I would appreciate the opportunity to have one further question added. In your Executive Summary AQ-4 Health Risk Reduction Measures see attachment, please note the recommendations to reduce health risk associated with emissions in sensitive areas including homes churches and schools etc. It recommends a 500 foot distance from the roadway and this areas. Only once the noted mitigations are applied, would the impacts be less than significant.

1

I must use the resent Widening of Lathrop Road Project in the City of Lathrop as an example of poor planning, road design and overall disregard for the health and welfare. Ms. Kim Anderson (Senior Reginal Planner for SJCOG) has walked Lathrop Road with us and gain firsthand knowledge of the dangerous situation the City of Lathrop has imposed upon the residents with one home 16 feet from the City's ROW. The city approved the project using a Mitigated Negative Declaration.

2

If the 2018 Regional Plan and EIR is going to include migration to reduce the health risks to the residents and general public, how will the Board ensure these migrations are implemented in local road project design prior to approval of funding in the future?

3

Thank you.

*Mary Meninga*  
Mary Meninga

*Adriana Lopez*  
Adriana Lopez  
546 E. Lathrop Road  
Lathrop, CA 95330

## Letter 10

**COMMENTER:** Mary Meninga and Adriana Lopez

**DATE:** November 28, 2018

### Response 10.1

The commenters state they have previously submitted concerns and questions regarding the 2018 RTP/SCS and the DEIR, as well as commented during previous public hearings for the project. The commenters correctly state that Mitigation Measure AQ-4: Health Risk Reduction Measures would be required to reduce Impact AQ-4 (increased exposure of sensitive receptors to diesel particulate matter) to a less than significant level.

The commenters' previously submitted letters are included in this FEIR as Letters 7 and 8, and are responded to accordingly. This comment does not pertain to the analysis of the DEIR, or raise any issues regarding the CEQA component of this project. This comment has been forwarded to the decision makers as part of the environmental review process.

### Response 10.2

Please see Global Response 3.

### Response 10.3

Please see Global Response 2.

## Letter 11

**April Board Meeting**  
**Margaret Lovano – April 4th**

Verbal comments received from Ms. Lovano are summarized below:

Margaret Levano stated she is the oldest resident on Lathrop Road, and has been there for 55 years. Her biggest concern with the Lathrop Road project is that her husband has Alzheimer's and doesn't realize this is his home anymore. He cries because there used to be 10 acres, and now it's all full of houses. She stated that for Alzheimer's, change is the worst part of all. They're having a very hard time with him and are unhappy with the progress being done, or not being done, with the project. The previous speakers covered her concerns and she agrees with them. Now her husband is receiving respite care, which has helped.

1

## Letter 11

**COMMENTER:** Margaret Levano

**DATE:** April 4, 2018

### Response 11.1

The commenter states several concerns regarding the Lathrop Road Project. Please see Global Response 3 for a full discussion of project specific impacts.

## Letter 12

April 26, 2018 Board Hearing

Irene Torres

Verbal comments received from Ms. Torres are summarized below:

Irene Torres, resident of Lathrop, expressed her concerns regarding the Lathrop Road widening project constructed in front of her residence. She expressed her concerns regarding the sidewalk that was taken from her property and re-poured by the city and whether it is now ADA compliant. Ms. Torres stated that she requested a survey report for her property and has not received it as she wants to identify where her property boundary is. Ms. Torres expressed her concerns about her aging parent's safety issues now at their residence, and that on-street parking was taken.

1

## Letter 12

**COMMENTER:** Irene Torres

**DATE:** April 26, 2018

### Response 12.1

The commenter states several concerns regarding the Lathrop Road Project. Please see Global Response 3 for a full discussion of project specific impacts.

## 4 Mitigation Monitoring and Reporting Program

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The California Environmental Quality Act (CEQA) requires that an agency adopt a Mitigation Monitoring or Reporting Program (MMRP) prior to approving a project that includes mitigation measures to reduce or avoid significant effects on the environment. This section is for the MMRP for the 2018 RTP/SCS. This MMRP has been prepared in compliance with the requirements of Section 21081.6 of the California Public Resources Code and Sections 15091(d) and 15097 of the CEQA Guidelines.

This MMRP lists in tabular format the mitigation measures for each issue area identified in the Draft EIR and revised in the Final EIR, and proposed for adoption in the CEQA Findings of Fact. This MMRP is designed to ensure adopted mitigation measures are implemented. For each mitigation measure, specifications are made herein that identify the timing and responsible monitoring agency.

SJCOG has lead agency status; and therefore, authority to enforce mitigation measures for projects for which they have discretionary authority. SJCOG does not have authority to require recommended mitigation measures be implemented by other implementing agencies (e.g., Caltrans, San Joaquin County, cities, transit agencies, etc.) that will be lead agencies for future transportation and land use development projects.

Implementing agencies or project sponsors considering approval of future projects under the 2018 RTP/SCS would utilize the EIR as a basis in determining mitigation measures for subsequent activities. Implementing agencies or project sponsors may be one of the following agencies:

- California Department of Transportation (Caltrans)
- San Joaquin Council of Governments (SJCOG)
- Transit Agencies within San Joaquin County
- San Joaquin County and its incorporated cities:
  - Escalon
  - Lathrop
  - Lodi
  - Manteca
  - Ripon
  - Stockton
  - Tracy

The Final EIR mitigation measures are programmatic first-tier mitigation that will be implemented by SJCOG. Additionally, the mitigation measures can and should be implemented by other implementing and project sponsor agencies, listed above, during future project-specific design and second-tier environmental review. When the RTPAs are the direct source of funding for transportation network improvement projects, RTPAs will require as a grant condition the implementation of those 2018 RTP/SCS mitigation measures that are applicable to, and feasible for, the project type being funded. The implementing agency or project sponsor agency for each future project will be responsible for assuring the project-specific mitigation measures it adopts are enforceable and will be responsible for monitoring those mitigation measures.

SJCOG will serve as Coordinator for overall implementation and administration of the MMRP, and its application to future projects. The Coordinator will prepare an annual progress report on mitigation measure implementation.

Mitigation Measure/Condition of Approval	Mitigation Monitoring Timing	Responsible Monitoring Agency	Compliance Verification		
			Initial	Date	Comments
<b>Aesthetics</b>					
<b>AES-1(a): Regional Planning Efforts</b>					
Impacts to aesthetic resources shall be minimized through cooperation, information sharing, and SJCOG's ongoing regional planning efforts.	During project permitting and environmental review.	SJCOG			
<b>AES-1(b): Alternative Design</b>					
<p>Project sponsors shall identify and protect panoramic views and significant landscape features or landforms and implement project-specific mitigation as applicable. If it is determined that a project would significantly obstruct scenic views, implementing and local agencies can and should consider alternative designs that seek to avoid and/or minimize obstruction of scenic views to the extent feasible. Project-specific design measures may include reduction in height of improvements or width of improvements to reduce obstruction of views, or relocation of improvements to reduce obstruction of views. Implementing local agencies can and should consider taking the following (or equivalent) actions:</p> <ul style="list-style-type: none"> <li>▪ Require that the scale and massing of new development in higher-density areas provide appropriate transitions in building height and bulk that are sensitive to the physical and visual character of adjoining neighborhoods that have lower development intensities and building heights; ensure building heights stepped back from sensitive adjoining uses to maintain appropriate transitions in scale and to protect scenic views;</li> <li>▪ Avoid siting electric towers, solar power facilities, wind power facilities, communication transmission facilities and/or above ground lines along scenic roadways and routes, to the maximum feasible extent;</li> <li>▪ Prohibit projects and activities that would obscure, detract from, or negatively affect the quality of views from designated scenic roadways or scenic highways; and comply with other local general plan policies and local control related to the protection of panoramic or scenic views or views of significant landscape features or landforms.</li> </ul>	During project permitting and environmental review.	Implementing agencies/project sponsor.			

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<b>AES-2: Design Measures for Visual Compatibility</b>					
<p>The project sponsor shall require measures that minimize contrasts in scale and massing between the project and surrounding natural forms and developments. Strategies to achieve this include but are not limited to:</p> <ul style="list-style-type: none"> <li>▪ Siting or designing projects to minimize their intrusion into important viewsheds;</li> <li>▪ Avoiding large cuts and fills when the visual environment (natural or urban) would be substantially disrupted;</li> <li>▪ Ensuring that re-contouring provides a smooth and gradual transition between modified landforms and existing grade;</li> <li>▪ Developing transportation systems to be compatible with the surrounding environments (e.g., colors and materials of construction material; scale of improvements);</li> <li>▪ Protecting or replacing trees in the project area;</li> <li>▪ 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. The implementing agency shall provide a performance security equal to the value of the landscaping/irrigation installation to ensure compliance with landscaping plans; and</li> <li>▪ Designing new structures to be compatible in scale, mass, character, and architecture with existing structures.</li> </ul>	During project permitting and environmental review.	Implementing agencies/project sponsor.			
<b>AES-3(a): Roadway Lighting</b>					
Roadway lighting shall be minimized 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.	During project permitting and environmental review.	Implementing agencies/project sponsor.			

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<b>AES-3(b): Lighting Design Measures</b>					
<p>As part of planning, design, and engineering for projects, project sponsors shall ensure that projects proposed near light-sensitive uses avoid substantial spillover lighting. Potential design measures include, but are not limited to, the following:</p> <ul style="list-style-type: none"> <li>▪ 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.</li> <li>▪ Lighting shall be directed away from habitat and open space areas adjacent to the project site.</li> <li>▪ 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.</li> <li>▪ 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.</li> </ul>	During project permitting and environmental review.	Implementing agencies/project sponsor.			
<b>AES-3(c): Glare Reduction Measures</b>					
<p>Implementing agencies shall minimize and control glare from transportation and infill development projects near glare-sensitive uses through the adoption of project design features such as:</p> <ul style="list-style-type: none"> <li>▪ Planting trees along transportation corridors to reduce glare from the sun;</li> <li>▪ Creating tree wells in existing sidewalks;</li> <li>▪ Adding trees in new curb extensions and traffic circles;</li> <li>▪ Adding trees to public parks and greenways;</li> <li>▪ Landscaping off-street parking areas, loading areas, and service areas;</li> <li>▪ Limiting the use of reflective materials, such as metal;</li> <li>▪ Using non-reflective material, such as paint, vegetative screening,</li> </ul>	During project permitting and environmental review.	Implementing agencies/project sponsor.			

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<p>matte finish coatings, and masonry;</p> <ul style="list-style-type: none"> <li>▪ Screening parking areas by using vegetation or trees;</li> <li>▪ Using low-reflective glass; and</li> <li>▪ Complying with applicable general plan policies, municipal code regulations, city or local controls related to glare</li> <li>▪ 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.</li> </ul>					
<b>Agricultural Resources</b>					
<b>AG-1: Impact Avoidance and Minimization</b>					
<p>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.</p> <ul style="list-style-type: none"> <li>▪ Require project relocation or corridor realignment, where feasible, to avoid Prime Farmland, Unique Farmland, or Farmland of Statewide Importance;</li> <li>▪ Compensatory mitigation at a minimum 1:1 (impacted: replaced) acreage ratio with Important Farmland of equivalent or better quality may be achieved in advance of impacts through the purchase or creation of mitigation credits or the implementation of mitigation projects through Regional Advance Mitigation Planning (RAMP), as deemed appropriate by the permitting agencies;</li> <li>▪ Require acquisition of conservation easements on land at least equal in quality and size as mitigation for the loss of Important Farmland; and/or</li> <li>▪ 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.).</li> </ul>	<p>During project permitting and environmental review.</p>	<p>Implementing agencies/project sponsor.</p>			

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<b>AG-2: Preservation Ratios</b>					
Project sponsors shall establish preservation ratios to minimize loss of forest land, and timberland, such as one acre of unprotected forest land and timber land to be permanently conserved for each acre of open space developed as a result of individual projects.	During project permitting and environmental review.	Implementing agencies/project sponsor.			
<b>AG-3: Design Features</b>					
Project sponsors shall implement design features in RTP/SCS projects to minimize development impacts on existing forest land. Project sponsors shall consider corridor realignment, buffer zones and setbacks, and berms and fencing where feasible, to avoid forest lands and timberlands and to reduce conflicts between transportation uses and forest and timberlands.	During project permitting and environmental review.	Implementing agencies/project sponsor.			
<b>Air Quality</b>					
<b>AQ-1: Long-term PM<sub>10</sub> Emission Reductions</b>					
SJCOG recommends that implementing and local agencies require project proponents to demonstrate compliance with SJVAPCD Rules 9510 and 9410, if applicable, prior to the issuance of grading/building permits for individual projects. In addition, SJCOG recommends that implementing and local agencies require projects that would exceed SJVAPCD significance thresholds for operational PM <sub>10</sub> emissions after implementation of applicable rules to enter into a Voluntary Emission Reduction Agreement (VERA) with the SJVAPCD to reduce PM <sub>10</sub> emissions to below threshold level, as described in the SJVAPCD's <i>Guidance for Assessing and Mitigating Air Quality Impacts (GAMAQI)</i> . A VERA is a mitigation measure by which the project proponent provides pound-for-pound mitigation of air emissions increases through a process that funds and implements emission reduction projects by the SJVAPCD.	During project permitting and environmental review. Prior to issuance of grading/building permits.	Implementing agencies/project sponsor.			

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<b>AQ-2: Short-term Criteria Pollutant Emission Reductions</b>					
<p>SJCOG recommends that implementing and local agencies require project proponents to demonstrate that they have obtained all required permits from the SJVAPCD prior to the issuance of grading/building permits for individual projects and that all construction activities will continuously comply with applicable regulatory standards, including, but not limited to SJVAPCD Regulation VIII, "Control Measures for Construction Emissions of PM<sub>10</sub>," and ISR. In addition, SJCOG recommends that implementing and local agencies require projects that would exceed SJVAPCD significance thresholds for construction emissions to enter into a VERA with the SJVAPCD, as described in the SJVAPCD's <i>GAMAQI</i>.</p>	<p>During project permitting and environmental review. Prior to issuance of grading/building permits.</p>	<p>Implementing agencies/project sponsor.</p>			
<b>AQ-3: Health Risk Reduction Measures</b>					
<p>Consistent with the general guidance contained in CARB's <i>Air Quality and Land Use Handbook</i>, appropriate and feasible measures shall be incorporated into project building design for residential, school and other sensitive uses located within 500 feet, or other distance as determined by the lead agency, of freeways, heavily travelled arterials, railways and other sources of DPM, including roadways experiencing significant vehicle delays (CARB 2005). The appropriate measures shall include one or more of the following methods, as determined by a qualified professional, as applicable:</p> <p>The project sponsor shall incorporate health risk reduction measures based on analysis of individual sites and project circumstances. These measures may include:</p> <ul style="list-style-type: none"> <li>▪ Avoid siting new sensitive land uses within 500 feet of a freeway, railway, or other source of TACs.</li> <li>▪ Require development projects for new sensitive land uses to be designed to minimize exposure to roadway-related pollutants to the maximum extent feasible through inclusion of design components including air filtration and physical barriers.</li> <li>▪ Avoid locating sensitive receptors near the entry and exit points of a distribution center.</li> <li>▪ Locate structures and outdoor living areas for sensitive uses as far as possible from the source of emissions. As feasible, locate doors,</li> </ul>	<p>During project permitting and environmental review.</p>	<p>Implementing agencies/project sponsor.</p>			

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<p>outdoor living areas, and air intake vents primarily on the side of the building away from the freeway 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.</p> <ul style="list-style-type: none"> <li>▪ Maintain a 50-foot buffer from a typical gas dispensing facility (under 3.6 million gallons of gas per year).</li> <li>▪ Install, operate and maintain in good working order a central heating and ventilation (HV) system or other air take system in the building or in each individual residential unit that meets the efficiency standard of the MERV 13. The HV system should include the following features: Installation of a high efficiency filter and/or carbon filter-to-filter particulates and other chemical matter from entering the building. Either HEPA filters or ASHRAE 85% supply filters should be used. Ongoing maintenance should occur.</li> <li>▪ Retain a qualified HV consultant or Home Energy Rating Systems (HERS) 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.</li> <li>▪ Achieve a performance standard of at least one air exchange per hour of fresh outside filtered air.</li> <li>▪ 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 if the building is not positively pressurized.</li> <li>▪ Require project owners to provide a disclosure statement to occupants and buyers summarizing technical studies that reflect health concerns about exposure to highway exhaust emissions.</li> <li>▪ Retain a qualified air quality consultant to prepare a health risk assessment (HRA) in accordance with CARB and the Office of Environmental Health and Hazard Assessment requirements to determine the exposure of project residents/occupants/users to stationary air quality pollutants prior to issuance of a demolition, grading, or building permit. Project sponsors shall implement HRA recommendations to a level which would not result in exposure of sensitive receptors to substantial pollutant concentrations (pursuant to the State CEQA Guidelines).</li> </ul>					

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<b>Biological Resources</b>					
<b>BIO-1(a): Biological Resources Screening and Assessment</b>					
<p>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 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. Pending the results of the biological resources assessment, design alterations, further technical studies (i.e. protocol surveys) and/or consultations with the USFWS, CDFW and/or other local, state, and federal agencies may be required. If the project cannot be designed without 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 any construction activities. The following mitigation measures [BIO-1(b) through BIO-1(j)] shall be incorporated only as applicable into the biological resources assessment 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.</p>	<p>During project permitting and environmental review.</p>	<p>Implementing agencies/project sponsor.</p>			

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<b>BIO-1(b): Special –status Plant Species Survey</b>					
<p>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 biological resources assessment. 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 CDFW, 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.</p>	<p>During project permitting and environmental review. Prior to construction but no earlier than two years before construction commences.</p>	<p>Implementing agencies/project sponsor.</p>			
<b>BIO-1(c): Special-status Plant Species Avoidance, Minimization, and Mitigation</b>					
<p>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.</p> <p>If special-status plants species cannot be avoided and would be impacted by a project implemented under the 2018 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</p>	<p>During project permitting and environmental review; prior to issuance of construction permits and approvals.</p>	<p>Implementing agencies/project sponsor.</p>			

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<p>jurisdiction overseeing the project for approval. The restoration plan shall include, at a minimum, the following components:</p> <ul style="list-style-type: none"> <li>▪ Description of the project/impact site (i.e., location, responsible parties, areas to be impacted by habitat type);</li> <li>▪ 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];</li> <li>▪ Description of the proposed compensatory mitigation site (location and size, ownership status, existing functions and values);</li> <li>▪ Implementation plan for the compensatory mitigation site (rationale for expecting implementation success, responsible parties, schedule, site preparation, planting plan);</li> <li>▪ Maintenance activities during the monitoring period, including weed removal as appropriate (activities, responsible parties, schedule);</li> <li>▪ 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);</li> <li>▪ 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: <ul style="list-style-type: none"> <li>▫ At least 80 percent survival of container plants, and/or</li> <li>▫ Successful establishment the required number of individuals planted from seed to meet required replacement ratios; and/or</li> <li>▫ 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 ;</li> </ul> </li> <li>▪ An adaptive management program and remedial measures to address any shortcomings in meeting success criteria;</li> <li>▪ Notification of completion of compensatory mitigation and agency</li> </ul>					

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<p>confirmation; and</p> <ul style="list-style-type: none"> <li>Contingency measures (initiating procedures, alternative locations for contingency compensatory mitigation, funding mechanism).</li> </ul>					
<b>BIO-1(d): Endangered/Threatened Species Habitat Assessment and Protocol Surveys</b>					
<p>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.</p> <p>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.</p>	<p>During project permitting and environmental review; prior to commencement of project construction.</p>	<p>Implementing agencies/project sponsor.</p>			
<b>BIO-1(e): Endangered/Threatened Species Avoidance and Compensatory Mitigation</b>					
<p>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 re-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 ratio's for</p>	<p>During project permitting and environmental review; prior to issuance of construction permits and approvals.</p>	<p>Implementing agencies/project sponsor.</p>			

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<p>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.</p> <p>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, techniques, and success criteria, and shall determine if the conservation site has restoration needs to function as a suitable mitigation site. If restoration is required on the conservation site, the HMMP shall contain the restoration components outlined under the Restoration Plan listed in measure BIO-1(c). The HMMP shall be submitted to the implementing agency for approval.</p>					
<b>BIO-1(f): Endangered/Threatened Species Avoidance and Minimization</b>					
<p>The following measures shall be applied to aquatic and terrestrial species, where appropriate. Project sponsors 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]).</p> <ul style="list-style-type: none"> <li>Preconstruction surveys for federal and/or state listed species with</li> </ul>	<p>During project permitting and environmental review; prior to and ongoing through project construction.</p>	<p>Implementing agencies/project sponsor.</p>			

Mitigation Measure/Condition of Approval	Mitigation Monitoring Timing	Responsible Monitoring Agency	Compliance Verification		
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<p>potential to occur shall be conducted where suitable habitat is present by a qualified biologist not more than 48 hours prior to the start of construction activities. The survey area shall include the proposed disturbance area and all proposed ingress/egress routes, plus a 100-foot buffer. If any life stage of federal and/or state listed species is found within the survey area, the appropriate measures in the BO or Habitat Conservation Plan (HCP)/Incidental Take Permit (ITP) issued by the USFWS/NMFS (relevant to federal listed species) and/or the ITP issued by the CDFW (relevant to state listed species) shall be implemented; or if such guidance is not in place for the activity, the USFWS, NMFS and/or CDFW should be consulted to determine the appropriate course of action. The results of the pre-construction surveys shall be submitted to the implementing agency for review and approval prior to start of construction.</p> <ul style="list-style-type: none"> <li>▪ 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 within or adjacent to the limits of disturbance shall have highly visible orange construction fencing installed between said area and the limits of disturbance.</li> <li>▪ All projects occurring within/adjacent to aquatic habitats (including riparian habitats and wetlands) shall be completed between April 1 and October 31, to avoid impacts to sensitive aquatic species.</li> <li>▪ 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 preactivity clearance surveys for endangered/threatened species. Alternatively, and upon approval of the CDFW and/or USFWS 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.</li> <li>▪ No endangered/threatened species shall be captured and relocated without authorization from the CDFW and/or USFWS.</li> </ul>					

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<ul style="list-style-type: none"> <li>▪ 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.</li> <li>▪ 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 the USFWS, NMFS and/or CDFW shall be consulted to determine the appropriate course of action, or the appropriate measures implemented in accordance with the BO or HCP/ITP issued by the USFWS (relevant to federal listed species) and/or the ITP issued by the CDFW (relevant to state listed species) and work can then continue as guided by those documents and the agencies as appropriate.</li> <li>▪ All vehicle maintenance/fueling/staging shall occur not less than 100 feet from any riparian habitat or water body. Suitable containment procedures shall be implemented to prevent spills. A minimum of one spill kit shall be available at each work location near riparian habitat or water bodies.</li> <li>▪ No equipment shall be permitted to enter wetted portions of any affected drainage channel.</li> <li>▪ 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.</li> <li>▪ If project activities could degrade water quality, water quality sampling shall be implemented to identify the pre-project baseline, and to monitor during construction for comparison to the baseline.</li> <li>▪ At the end of each work day, excavations shall be secured with cover or a ramp shall be provided to prevent wildlife entrapment.</li> <li>▪ All trenches, pipes, culverts or similar structures shall be inspected for animals prior to burying, capping, moving, or filling.</li> </ul>					

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			Initial	Date	Comments
<b>BIO-1(g): Non-Listed Special-status Animal Species Avoidance and Minimization</b>					
<p>Depending on the species identified in the BRA, measures shall be selected from among the following to reduce the potential for impacts to non-listed special-status animal species:</p> <ul style="list-style-type: none"> <li>▪ 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 implementing agency for their review and approval prior to the start of construction.</li> <li>▪ 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.</li> <li>▪ 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. The report shall be submitted within 30 days of completion of the project.</li> <li>▪ 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. <ul style="list-style-type: none"> <li>▫ 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.</li> </ul> </li> </ul>	<p>During project permitting and environmental review; prior to, during and after project construction.</p>	<p>Implementing agencies/project sponsor.</p>			

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<ul style="list-style-type: none"> <li>▫ 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.</li> <li>▫ 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.</li> </ul>					
<b>BIO-1(h): Preconstruction Surveys for Nesting Birds</b>					
<p>For construction activities occurring during the nesting season (generally February 1 to September 15), surveys for nesting birds covered by the CFGC, the Migratory Bird Treaty Act, and Bald and Golden Eagle Protection Act shall be conducted by a qualified biologist no more than 30 days prior to vegetation removal activities.</p> <p>A qualified biologist shall conduct preconstruction surveys for raptors. The survey for the presence of bald and golden eagles shall cover all areas within of the disturbance footprint plus a one-mile buffer where access can be secured. The survey area for all other nesting bird and raptor species shall include the disturbance footprint plus a 300-foot and 500-foot buffer, respectively.</p> <p>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.</p> <p>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</p>	<p>During project permitting and environmental review; prior to construction activities; during construction activities if required.</p>	<p>Implementing agencies/project sponsor.</p>			

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<p>disturbance regime, relevant landscape characteristics, and the nature, timing, and duration of the expected disturbance. The buffer shall be established between February 1 and August 31; however, buffers may be relaxed earlier than August 31 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.</p> <p>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.</p>					
<b>BIO-1(i): Worker Environmental Awareness Program (WEAP)</b>					
<p>Prior to initiation of construction activities (including staging and mobilization), all personnel associated with project construction shall attend WEAP training, conducted by a qualified biologist, to aid workers in recognizing special-status resources that may occur in the project area. The specifics of this program shall include identification of the sensitive species and habitats, a description of the regulatory status and general ecological characteristics of sensitive resources, and review of the limits of construction and mitigation measures required to reduce impacts to biological resources within the work area. 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 WEAP and understand the information presented to them.</p>	<p>During project permitting and environmental review.</p>	<p>Implementing agencies/project sponsor.</p>			
<b>BIO-2(a): Jurisdictional Delineation</b>					
<p>If the results of measure BIO-1(a) indicates projects implemented under the 2018 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 a jurisdictional delineation. The jurisdictional delineation shall determine the extent of the jurisdiction for each of these agencies and shall be conducted in accordance with the requirement set forth by each agency. The result shall be a jurisdictional delineation report that shall be submitted to the implementing agency, USACE, RWQCB, and CDFW as appropriate, for</p>	<p>During project permitting and environmental review.</p>	<p>Implementing agencies/project sponsor.</p>			

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<p>review and approval, and the project shall be designed to minimize impacts to jurisdictional areas to the maximum extent feasible. The delineation shall serve as the basis to identify jurisdictional areas to be protected during construction, through implementation of the avoidance and minimization identified in measure BIO-2(f).</p>					
<b>BIO-2(b): Wetlands, Drainage, and Riparian Habitat Restoration</b>					
<p>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 natural lands (vernal pools) and 1:1 creation plus 2:1 preservation for natural lands (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 or USACE) has determined that restoration has been successful. Alternatively, mitigation shall be accomplished through purchase of credits from an approved wetlands mitigation bank.</p>	<p>During project permitting and environmental review.</p>	<p>Implementing agencies/project sponsor.</p>			
<b>BIO-2(c): Landscaping Plan</b>					
<p>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 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.</p>	<p>During project permitting and environmental review.</p>	<p>Implementing agencies/project sponsor.</p>			

Mitigation Measure/Condition of Approval	Mitigation Monitoring Timing	Responsible Monitoring Agency	Compliance Verification		
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<b>BIO-2(d): Sensitive Vegetation Community Avoidance and Mitigation</b>					
<p>If the results of measure BIO-1(a) indicates projects implemented under the 2018 RTP/SCS would impact sensitive vegetation communities, impacts to sensitive communities shall be avoided through final 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.</p> <p>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.</p>	During project permitting and environmental review.	Implementing agencies/project sponsor.			
<b>BIO-2(e): Invasive Weed Prevention and Management Program</b>					
<p>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 to prevent invasion of native habitat by non-native plant species. The plan shall be submitted to the implementing agency for review and approval. A list of target species shall be included, along with measures for early detection and eradication.</p> <p>The plan, which shall be implemented by the project sponsor, shall also include, but not be limited to, the following measures to prevent the introduction of invasive weed species:</p>	During project permitting and environmental review; prior to construction activities; during construction activities.	Implementing agencies/project sponsor.			

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<ul style="list-style-type: none"> <li>▪ During construction, the project shall make all reasonable efforts to limit the use of imported soils for fill. Soils currently existing on-site should be used for fill material. 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.</li> <li>▪ To minimize colonization of disturbed areas and the spread of invasive species, the contractor shall: stockpile topsoil and redeposit the stockpiled soil after construction, or transport the topsoil to a permitted landfill for disposal.</li> <li>▪ The erosion control/ restoration plans for the project must emphasize the use of native species that are expected to occur in the area and that are considered suitable for use at the project site.</li> <li>▪ All erosion control materials, including straw bales, straw wattles, or mulch used on-site must be free of invasive species seed.</li> <li>▪ Exotic and invasive plant species shall be excluded from any erosion control seed mixes and/or landscaping plant palettes associated with the proposed project</li> <li>▪ 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.</li> </ul>					

**BIO-2(f): Wetlands, Drainages, and Riparian Habitat Best Management Practices During Construction**

<p>The following best management practices shall be required for development within or adjacent to wetlands, drainages, or riparian habitat:</p> <ul style="list-style-type: none"> <li>▪ 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.</li> <li>▪ To control sedimentation during and after project implementation, appropriate erosion control materials shall be deployed to</li> </ul>	<p>During project permitting and environmental review; prior to construction activities; during construction activities.</p>	<p>Implementing agencies/project sponsor.</p>
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<p>minimize adverse effects on jurisdictional areas in the vicinity of the project.</p> <ul style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>All project-generated debris, building materials, and rubbish shall be removed from jurisdictional areas and from areas where such materials could be washed into them.</li> <li>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.</li> <li>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. All workers shall be informed of the importance of preventing spills and of the appropriate measures to take should an accidental spill occur.</li> </ul>					
<b>BIO-3(a): Project Design for Wildlife Connectivity</b>					
<p>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 is required for public safety concerns, they shall be designed to permit wildlife movement by incorporating design features such as:</p> <ul style="list-style-type: none"> <li>A minimum 16 inches between the ground and the bottom of the fence to provide clearance for small animals;</li> </ul>	During project permitting and environmental review.	Implementing agencies/project sponsor.			

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<ul style="list-style-type: none"> <li>▪ A minimum 12 inches between the top two wires, or top the fence with a wooden rail, mesh, or chain link instead of wire to prevent animals from becoming entangled; and</li> <li>▪ If privacy fencing is required near open space areas, openings at the bottom of the fence measure at least 16 inches in diameter shall be installed at reasonable intervals to allow wildlife movement, or the fence may be installed with the bottom at least 16 inches above the ground level.</li> <li>▪ 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.</li> <li>▪ 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)</li> </ul>					
<b>BIO-3(b): Maintain Connectivity in Drainages</b>					
<p>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).</p> <p>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.</p> <p>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 movement while the diversion is in place.</p>	During project permitting and environmental review.	Implementing agencies/project sponsor.			

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<b>BIO-3(c): Construction Best Management Practices to Minimize Disruption to Wildlife</b>					
<p>The following construction BMPs shall be incorporated into all grading and construction plans in order to minimize temporary disruption of wildlife, which could hinder wildlife movement:</p> <ul style="list-style-type: none"> <li>▪ Designation of a 20 mile per hour speed limit in all construction areas.</li> <li>▪ Daily construction work schedules shall be limited to daylight hours only.</li> <li>▪ Mufflers shall be used on all construction equipment and vehicles shall be in good operating condition.</li> <li>▪ All trash shall be placed in sealed containers and shall be removed from the project site a minimum of once per week.</li> <li>▪ No pets are permitted on project site during construction.</li> </ul>	During project permitting and environmental review; prior to issuance of grading and construction permits.	Implementing agencies/project sponsor, and onsite construction manager.			
<b>Cultural Resources</b>					
<b>CR-1: Historical Resources Impact Minimization</b>					
<p>Prior to individual project permit issuance, the project sponsor of a 2018 RTP/SCS project involving earth disturbance or construction of permanent above ground structures or roadways shall 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 help in determining 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, or historical architect meeting the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation, Professional Qualification Standards. The evaluation shall comply with CEQA Guidelines section 15064.5(b). Study recommendations shall be implemented, which may include, but would not be limited to, the following:</p> <ul style="list-style-type: none"> <li>▪ Realign or redesign projects to avoid impacts on known historic resources where possible.</li> </ul>	During project permitting and environmental review.	Implementing agencies/project sponsor.			

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<ul style="list-style-type: none"> <li>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.</li> <li>Comply with existing local regulations and policies that exceed or reasonably replace any of the above measures that protect historic resources.</li> </ul>					
<b>CR-2: Archaeological Resources Impact Minimization</b>					
<p>Before construction activities, project sponsors shall retain a qualified archaeologist to conduct a record search at the Northwest Information Center to determine whether the project area has been previously surveyed and whether resources were identified. When recommended by the Information Center, project sponsors shall retain a qualified archaeologist to conduct archaeological surveys before construction activities. Project sponsors shall follow recommendations identified in the survey, which may include, but would not be limited to: subsurface testing, designing and implementing a Worker Environmental Awareness Program (WEAP), construction monitoring by a qualified archaeologist, or avoidance of sites and preservation in place.</p> <p>In the event that 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), all ground-disturbing activity in the area of the discovery shall be halted until a qualified archaeologist can assess the significance of the find. If the find is a prehistoric archaeological site, the appropriate Native American group shall be notified. If the archaeologist determines that the find does not meet the CRHR standards of significance for cultural resources, construction may proceed. If the archaeologist determines that further information is needed to evaluate significance, a testing plan shall be prepared and implemented. If the find is determined to be significant by the qualified archaeologist (i.e., because the find is determined to constitute either an historical resource or a unique archaeological</p>	<p>During project permitting and environmental review; prior to construction activities; during construction activities.</p>	<p>Implementing agencies/project sponsor.</p>			

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<p>resource), the archaeologist shall work with the project sponsor to avoid disturbance to the resources, and if complete avoidance is not feasible in light of project design, economics, logistics, and other factors, shall recommend additional measures such as the preparation and implementation of a data recovery plan. All cultural resources work shall follow accepted professional standards in recording any find including submittal of standard DPR Primary Record forms (Form DPR 523) and location information to the appropriate California Historical Resources Information System office for the project area. Project sponsors shall comply with existing local regulations and policies that exceed or reasonably replace any of the above measures that protect archaeological resources.</p>					
<b>CR-3: Paleontological Resources Impact Minimization</b>					
<p>The project sponsor of a 2018 RTP/SCS project involving ground disturbing activities (including grading, trenching, foundation work, and other excavations) shall retain a qualified paleontologist, defined as a paleontologist who meets the Society of Vertebrate Paleontology (SVP) standards for Qualified Professional Paleontologist (SVP 2010), to conduct a Paleontological Resources Assessment (PRA). The PRA shall determine the age and paleontological sensitivity of geologic formations underlying the proposed disturbance area, consistent with SVP Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources (SVP 2010) guidelines for categorizing paleontological sensitivity of geologic units within a project area. If underlying formations are found to have a high potential (sensitivity) for paleontological resources, the following measures shall apply:</p> <ul style="list-style-type: none"> <li>▪ Paleontological Mitigation and Monitoring Program. A qualified paleontologist shall prepare a Paleontological Mitigation and Monitoring Program to be implemented during ground disturbance activity. This program shall outline the procedures for construction staff Worker Environmental Awareness Program (WEAP) training, paleontological monitoring extent and duration (i.e., in what locations and at what depths paleontological monitoring shall be required), salvage and preparation of fossils, the final mitigation and monitoring report, and paleontological</li> </ul>	<p>During project permitting and environmental review.</p>	<p>Implementing agencies/project sponsor.</p>			

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<p>staff qualifications.</p> <ul style="list-style-type: none"> <li>▪ Paleontological Worker Environmental Awareness Program (WEAP). Prior to the start of ground disturbance activity greater than two feet below existing grade, construction personnel shall be informed on the appearance of fossils and the procedures for notifying paleontological staff should fossils be discovered by construction staff.</li> <li>▪ Paleontological Monitoring. Ground disturbing activity with the potential to disturbed geologic units with high paleontological sensitivity 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 to weekly spot-checking under the discretion of the qualified paleontologist. Monitoring shall be conducted by a qualified paleontological monitor, who is defined as an individual who has experience with collection and salvage of paleontological resources.</li> <li>▪ Salvage of Fossils. 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.</li> <li>▪ 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.</li> <li>▪ 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 mitigation and monitoring program. The report shall include discussion of the location, duration and methods of the</li> </ul>					

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monitoring, stratigraphic sections, any recovered fossils, and the scientific significance of those fossils, and where fossils were curated.					
<b>Geology and Soils</b>					
<b>GEO-1: Geotechnical Analysis</b>					
Project sponsors shall complete site-specific geotechnical reports conducted by a qualified geotechnical expert. Any investigations shall comply with the California Geological Survey's Guidelines for Evaluating and Mitigating Seismic Hazards in California and projects shall comply with the recommendations stated in the geotechnical analysis. Recommendations may include, but are not limited to, the following: fill placement and compaction, isolated and continuous footing, site specific pipe bedding, and site specific seismic design criteria.	During project permitting and environmental review.	Implementing agencies/project sponsor.			
<b>Greenhouse Gas Emissions/Climate Change</b>					
<b>GHG-2: Construction GHG Reduction Measures</b>					
The project sponsor shall require the construction contractor to incorporate the most recent GHG reduction measures and/or technologies for reducing diesel particulate and NO <sub>x</sub> emissions measures for off-road construction vehicles. The required measures shall be noted on all construction plans and the project sponsor shall perform periodic site inspections. Current GHG-reducing measures include, but are not limited to, the following: <ul style="list-style-type: none"> <li>▪ Use of diesel construction equipment meeting CARB's Tier 4 certified engines wherever feasible for off-road heavy-duty diesel engines, and comply with the State Off-Road Regulation. Where the use of Tier 4 engines is not feasible, Tier 3 certified engines shall be used; where Tier 3 engines are not feasible, Tier 2 certified engines shall be used;</li> <li>▪ Use of on-road heavy-duty trucks that meet the CARB's 2007 or cleaner certification standard for on-road heavy-duty diesel engines, and comply with the State On-Road Regulation;</li> <li>▪ All on and off-road diesel equipment shall not idle for more than 5</li> </ul>	During project permitting and environmental review.	Implementing agencies/project sponsor.			

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<p>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;</p> <ul style="list-style-type: none"> <li>▪ Use of electric powered equipment in place of diesel powered equipment, when feasible;</li> <li>▪ Substitute gasoline-powered in place of diesel-powered equipment, when feasible;</li> <li>▪ 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;</li> <li>▪ Use of materials sourced from local suppliers, as feasible; and</li> <li>▪ Recycling of at least 50 percent of construction waste materials.</li> </ul>					
<b>GHG-Cumulative 1: Regional Measures to Support GHG Reductions</b>					
<p>To support GHG reductions on a regional level, as well as address the gap between SB 375 and needed reductions from the transportation and land use sectors to achieve statewide targets, SJCOG shall take the following actions, as feasible (most of the following measures have been adapted from Appendix C of the 2017 Scoping Plan):</p> <ul style="list-style-type: none"> <li>▪ Explore and develop financing and tools to support more efficient and more equitable development, including reducing barriers to housing development in infill areas; promoting infill development and necessary infrastructure in existing communities; and implementing strategies to ensure that long-time residents can stay in place as neighborhoods improve.</li> <li>▪ Support transportation policies such as priced express lanes, reduced parking requirements for development, and transit commuter incentives that promote infill development and reduce vehicle miles traveled.</li> <li>▪ Explore transit pass subsidies or other ways to reduce transit fares, particularly for disadvantaged communities, students, seniors, the disabled, and other transit-dependent users.</li> <li>▪ Support expansion and improvement of active transportation infrastructure to help meet the California Transportation Plan goal of quadrupling active transportation mode share by 2040.</li> </ul>	During project permitting and environmental review.	SJCOG; implementing agencies/project sponsor.			

Mitigation Measure/Condition of Approval	Mitigation Monitoring Timing	Responsible Monitoring Agency	Compliance Verification		
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<ul style="list-style-type: none"> <li>▪ Explore ways to expand access to car share, bike share, and ride share services.</li> <li>▪ Explore ways to increase use of lower-carbon construction materials for transportation infrastructure projects.</li> <li>▪ Implement sustainable landscaping practices for transportation infrastructure projects that contribute to the enhancement of a multi-modal transportation system.</li> <li>▪ Explore ways to: <ul style="list-style-type: none"> <li>▫ Promote teleworking and alternative work schedules.</li> <li>▫ Incentivize use of transit and active transportation for commuting.</li> <li>▫ Increase ride sharing to work to help meet the California Transportation Plan goal of increasing carpool vehicles by 15% by 2040.</li> </ul> </li> <li>▪ Update any future RTP/SCS to incorporate policies and measures that lead to reduced GHG emissions in accordance with AB 32</li> <li>▪ Coordinate with CARB and air districts in efforts to implement the latest Scoping Plan</li> <li>▪ Continue coordination with other MPOs regarding statewide strategies to reduce GHG emissions and facilitate the implementation of SB 375</li> </ul> <p>SJCOG and member agencies shall promote the use of dibs (formerly Commute Connection), a program of SJCOG serving San Joaquin, Stanislaus, and Merced counties. dibs promotes and encourages smart travel through carpooling, vanpooling, riding transit, walking, &amp; biking. The program's core focus is to reduce single occupant vehicle commutes, thus reducing congestion and GHG emissions, and improving air quality. Information on dibs can be found here: <a href="https://www.dibsmway.com/">https://www.dibsmway.com/</a></p>					

**GHG Cumulative 2: Project-level Measures to Support GHG Reductions**

Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SJCOG has identified mitigation measures capable of avoiding or reducing the potential to conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emission of GHGs that are within the jurisdiction and authority of CARB, local	During project permitting and environmental review.	SJCOG; implementing agencies/project sponsor.
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<p>air districts, and/or Lead Agencies. Where the lead agency has identified that a project has the potential to conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emission of GHGs, the lead agency can and should consider mitigation measures to mitigate the significant effects of greenhouse gas impacts to ensure compliance with all applicable laws, regulations, governing CAPs, general plans, adopted policies and plans of local agencies, and standards set forth by responsible public agencies for the purpose of reducing emissions of greenhouse gases, as applicable and feasible. Consistent with Section 15126.4(c) of the State CEQA Guidelines, compliance can be achieved through adopting GHG mitigation measures as set forth below, or through comparable measures identified by Lead Agency:</p> <ul style="list-style-type: none"> <li>▪ Measures in an adopted plan or mitigation program for the reduction of emissions that are required as part of the Lead Agency’s decision.</li> <li>▪ Reduction in emissions resulting from a project through implementation of project features, project design, or other measures, such as those described in Appendix F of the State CEQA Guidelines.</li> <li>▪ Off-site measures to mitigate a project’s emissions.</li> <li>▪ Measures that consider incorporation of Best Available Control Technology (BACT) during design, construction, and operation of projects to minimize GHG emissions, including but not limited to: <ul style="list-style-type: none"> <li>▫ Use energy and fuel efficient vehicles and equipment;</li> <li>▫ Deployment of zero- and/or near zero emission technologies;</li> <li>▫ Use lighting systems that are energy efficient, such as LED technology</li> <li>▫ Use the minimum feasible amount of GHG-emitting construction materials that is feasible;</li> <li>▫ Use cement blended with the maximum feasible amount of flash or other materials that reduce GHG emissions from cement production;</li> <li>▫ Incorporate design measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse;</li> <li>▫ Incorporate design measures to reduce energy consumption</li> </ul> </li> </ul>					

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<p>and increase use of renewable energy;</p> <ul style="list-style-type: none"> <li>▫ Incorporate design measures to reduce water consumption;</li> <li>▫ Use lighter-colored pavement where feasible;</li> <li>▫ Recycle construction debris to maximum extent feasible;</li> <li>▫ Plant shade trees in or near construction projects where feasible; and</li> <li>▫ Solicit bids that include concepts listed above.</li> </ul> <ul style="list-style-type: none"> <li>▪ Measures that encourage transit use, carpooling, bike-share and car-share programs, active transportation, and parking strategies, including, but not limited to, transit-active transportation coordinated strategies, increased bicycle carrying capacity on transit and rail vehicles;</li> <li>▪ Incorporating bicycle and pedestrian facilities into project designs, maintaining these facilities, and providing amenities incentivizing their use; providing adequate bicycle parking and planning for and building local bicycle projects that connect with the regional network;</li> <li>▪ Improving transit access to rail and bus routes by incentives for construction of transit facilities within developments, and/or providing dedicated shuttle service to transit stations; and</li> <li>▪ Adopting employer trip reduction measures to reduce employee trips such as vanpool and carpool programs, providing end-of-trip facilities, and telecommuting programs.</li> <li>▪ Designate a percentage of parking spaces for ride-sharing vehicles or high-occupancy vehicles, and provide adequate passenger loading and unloading for those vehicles;</li> <li>▪ Land use siting and design measures that reduce GHG emissions, including: <ul style="list-style-type: none"> <li>▫ Developing on infill and brownfields sites;</li> <li>▫ Building high density and mixed use developments near transit;</li> <li>▫ Retaining on-site mature trees and vegetation, and planting new canopy trees;</li> <li>▫ Measures that increase vehicle efficiency, encourage use of zero and low emissions vehicles, or reduce the carbon content of fuels, including constructing or encouraging construction of</li> </ul> </li> </ul>					

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<ul style="list-style-type: none"> <li>▫ electric vehicle charging stations or neighborhood electric vehicle networks, or charging for electric bicycles; and</li> <li>▫ Measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse.</li> </ul>					

**Hazards and Hazardous Materials**

**HAZ-1: Site Remediation**

If an individual project included in the 2018 RTP/SCS is located on or near a hazardous materials and/or waste site pursuant to Government Code Section 65962.5, or has the potential for residual hazardous materials and/or waste as a result of location and/or prior uses, the project sponsor 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.

During project permitting and environmental review.

Implementing agencies/project sponsor.

**Hydrology and Water Quality**

**W-1(a): Fertilizer/Pesticide Application Plan**

The project sponsor of a 2018 RTP/SCS project shall ensure that fertilizer/pesticide application plans for any new right-of-way landscaping are prepared to minimize deep percolation of

During project permitting and environmental review.

Implementing agencies/project sponsor.

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contaminants. The plans shall specify the use of products that are safe for use in and around aquatic environments.					
<b>W-1(b): Runoff Capture</b>					
The project sponsor of a 2018 RTP/SCS project involving construction of a new roadway, or widening or extension of an existing roadway, shall ensure that the improvement directs runoff into subsurface percolation basins and traps which would allow for the removal of urban pollutants, fertilizers, pesticides, and other chemicals.	During project permitting and environmental review.	Implementing agencies/project sponsor.			
<b>W-2(a): Monitoring Systems, Long-Term Administrative Procedures, and Uniform Building Code For Dewatering Facilities</b>					
Project sponsors shall ensure that projects requiring continual dewatering facilities implement monitoring systems and long-term administrative procedures to ensure proper water management that prevents degrading of surface water and minimizes, to the greatest extent possible, adverse impacts on groundwater for the life of the project. Construction designs can and should comply with appropriate building codes and standard practices including the Uniform Building Code.	During project permitting and environmental review.	Implementing agencies/project sponsor.			
<b>W-2(b): Maximize Permeable Surface Areas</b>					
Implementing and local agencies shall maximize, where practical and feasible, permeable surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. New impervious surfaces can and should be minimized to the greatest extent possible, including the use of in-lieu fees and off-site mitigation.  Implementing and local agencies should avoid development in groundwater recharge areas. Where feasible, transportation facilities should not be sited in groundwater recharge areas, to prevent conversion of those areas to impervious surface.	During project permitting and environmental review.	Implementing agencies/project sponsor.			
<b>W-2(c): Avoid Development in Groundwater Recharge Areas</b>					
Project sponsors shall avoid development in groundwater recharge areas. To the extent practicable, transportation facilities shall be sited away from areas of groundwater recharge in order to prevent	During project permitting and environmental review.	Implementing agencies/project			

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impervious surface creation.		sponsor.			
<b>W-2(d): Reduce Hardscape to Facilitate Groundwater Recharge</b>					
As appropriate, project sponsors shall reduce hardscape to the extent feasible in order to facilitate groundwater recharge.	During project permitting and environmental review.	Implementing agencies/project sponsor.			
<b>W-2(e): Bioswale Installation</b>					
The project sponsor of a 2018 RTP/SCS project, such as new roads or roadway extensions, that would substantially increase impervious surfaces shall ensure that bioswales are installed, where feasible, to facilitate groundwater recharge using stormwater runoff from the project site while improving water quality.	During project permitting and environmental review.	Implementing agencies/project sponsor.			
<b>W-2(f): Porous Pavement</b>					
Projects that involve streetscaping, parking, transit, and land use improvements shall ensure that porous pavement materials are utilized, where feasible, to allow for groundwater percolation.	During project permitting and environmental review.	Implementing agencies/project sponsor.			
<b>W-2(g): Construction Dust Suppression</b>					
Ensure that sponsored 2018 RTP/SCS projects, where economically feasible and available, utilize reclaimed and/or desalinated water is used for dust suppression during construction activities. This measure shall be noted on construction plans and shall be spot checked by the local jurisdiction.	During project permitting and environmental review.	Implementing agencies/project sponsor.			
<b>W-3(a): Project-Specific Hydrology Studies</b>					
Project sponsors conduct or require project-specific hydrology studies for projects proposed to be constructed within floodplains to demonstrate compliance with applicable federal, state, and local agency flood-control regulations. These studies should identify project design features or mitigation measures that reduce impacts to either floodplains or flood flows to a less than significant level. For the purposes of this mitigation, less than significant means consistent with federal, state, and local regulations and laws related to development	During project permitting and environmental review.	Implementing agencies/project sponsor.			

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in the floodplain.					
<b>W-3(b): Development in Flood Hazard Areas</b>					
Project sponsors shall, to the extent feasible and appropriate, prevent development in flood hazard areas that do not have appropriate protections.	During project permitting and environmental review.	Implementing agencies/project sponsor.			
<b>W-3(c): Elevated Structures in Flood Zones</b>					
If a 2018 RTP/SCS project is in an area with high flooding potential, project sponsors shall ensure that the structure is elevated at least one foot above the 100-year flood zone elevation and that bank stabilization and erosion control measures are implemented along creek crossings, where applicable.	During project permitting and environmental review.	Implementing agencies/project sponsor.			
<b>W-4(a): Coordinated Development And Support Of Sustainable Policies In Accommodating Growth</b>					
SJCOG, in coordination with regional water agencies and other stakeholders, shall encourage the kind of regional coordination throughout California that develops and supports sustainable policies in accommodating growth.	During project permitting and environmental review.	SJCOG; implementing agencies/project sponsor.			
<b>W-4(b): Reduce Exterior Uses Of Water And Promote Reductions In Water Consumption</b>					
Project sponsors should reduce exterior uses of water in public areas, and promote reductions in private homes and businesses by shifting to drought-tolerant native landscape plantings, using weather-based irrigation systems, educating other public agencies about water use, and installing related water pricing incentives. Local jurisdictions should work with local water retailers to promote the availability of drought resistant landscaping options and provide information on where these can be purchased. Use of reclaimed water especially in median landscaping and hillside landscaping can and should be implemented where feasible.	During project permitting and environmental review.	Implementing agencies/project sponsor.			
<b>W-4(c): Minimize Future Impacts To Water Supply</b>					
Future impacts to water supply should be minimized through cooperation, information sharing, and program development as part	During project permitting and environmental review.	SJCOG; implementing agencies/project			

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of the SJCOG's ongoing regional planning efforts, in-coordination with regional water agencies, and other stakeholders.		sponsor.			
<b>W-4(d): Water Demand/Pressure Requirements</b>					
Project sponsors should coordinate with the local water provider to ensure that existing and/or planned water supply and water conveyance facilities are capable of meeting water demand/ pressure requirements. In accordance with state law, a water supply assessment can and should be required for projects that meet the size requirements specified in the regulations. In coordination with the local water provider, each project sponsor will identify specific on- and off-site improvements needed to ensure that impacts related to water supply and conveyance demand/pressure requirements are addressed prior to issuance of a certificate of occupancy. Water supply and conveyance demand/pressure clearance from the local water provider will be required at the time that a water connection permit application is submitted.	During project permitting and environmental review.	Implementing agencies/project sponsor.			
<b>W-4(e): Water Conservation Measures In New Development</b>					
Project sponsors should implement water conservation measures in new development that should include but not be limited to the following: <ul style="list-style-type: none"> <li>▪ High efficiency toilets</li> <li>▪ Restroom faucets with automatic shut-off</li> <li>▪ High efficiency clothes washers</li> <li>▪ High efficiency dishwashers</li> <li>▪ Use of reclaimed water for appropriate uses</li> <li>▪ Water saving irrigation measures including: weather-based irrigation controller with rain shut-off.</li> </ul>	During project permitting and environmental review.	Implementing agencies/project sponsor.			
<b>W-4(f): Identify Feasible and Reasonable Measures To Reduce Water Consumption</b>					
Project sponsors shall consult with the local water provider to identify feasible and reasonable measures to reduce water consumption, including, but not limited to, systems to use reclaimed water for landscaping, drip irrigation, re-circulating hot water systems, water	During project permitting and environmental review.	Implementing agencies/project sponsor.			

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conserving landscape techniques (such as mulching, installation of drip irrigation systems, landscape design to group plants of similar water demand, soil moisture sensors, automatic irrigation systems, clustered landscaped areas to maximize the efficiency of the irrigation system), water conserving kitchen and bathroom fixtures and appliances, thermostatically controlled mixing valves for baths and showers, and insulated hot water lines.					
<b>W-4(g): Water Conservation and Recycled Water</b>					
Project sponsors should adopt and implement a comprehensive strategy to increase water conservation and the use of recycled water.	During project permitting and environmental review.	Implementing agencies/project sponsor.			
<b>W-4(h): Water-Efficient Building Design</b>					
Project sponsors should establish building design guidelines and criteria to promote water-efficient building design, including minimizing the amount of non-roof impervious surfaces around the building(s) and menus and check-lists for developers and contractors to ensure water-efficient infrastructure and technology are used in new construction, including low-flow toilets and shower heads, moisture-sensing irrigation, and other such advances.	During project permitting and environmental review.	Implementing agencies/project sponsor.			
<b>W-4(i): Safe And Effective Use Of Gray Water (On-Site Water Recycling)</b>					
Project sponsors should establish criteria and standards to permit the safe and effective use of gray water (on-site water recycling), and review and appropriately revise, without compromising health and safety, other building code requirements that might prevent the use of such systems.	During project permitting and environmental review.	Implementing agencies/project sponsor.			
<b>Noise</b>					
<b>N-1: Noise Reduction Practices</b>					
Project sponsors shall assess and mitigate to the extent feasible short- and long-term noise impacts in accordance with applicable regulations and to implement site-specific noise reduction measures. Reduction	During project permitting and environmental review.	Implementing agencies/project sponsor.			

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measures include, but are not limited to, the following:					
<ul style="list-style-type: none"> <li>▪ Equipment and trucks used for project construction shall utilize the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds, wherever feasible).</li> <li>▪ Except as may be exempted by the Lead Agency (or other appropriate government agency), impact tools (e.g., jack hammers, pavement breakers, and rock drills) used for project construction shall be hydraulically or electrically powered to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust should be used; this muffler can lower noise levels from the exhaust by up to about 10 dB(A). External jackets on the tools themselves should be used, if such jackets are commercially available and this could achieve a reduction of 5 dB (A). Quieter procedures should be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures.</li> <li>▪ Stationary noise sources shall be located as far from adjacent sensitive receptors as possible and they should be muffled and enclosed within temporary sheds, incorporate insulation barriers, or use other measures as determined by the Lead Agency (or other appropriate government agency) to provide equivalent noise reduction.</li> <li>▪ A procedure and phone numbers for notifying the Lead Agency staff and local Police Department (during regular construction hours and off-hours);</li> <li>▪ A sign posted on-site pertaining with permitted construction days and hours and complaint procedures and who to notify in the event of a problem. The sign should also include a listing of both the Lead Agency and construction contractor's telephone numbers (during regular construction hours and off-hours);</li> <li>▪ The designation of an on-site construction complaint and enforcement manager for the project;</li> <li>▪ Notification of neighbors and occupants within 300 feet of the</li> </ul>					

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<p>project construction area at least 30 days in advance of extreme noise generating activities about the estimated duration of the activity.</p> <ul style="list-style-type: none"> <li>▪ A preconstruction meeting can and should be held with the job inspectors and the general contractor/on-site project manager to confirm that noise measures and practices (including construction hours, neighborhood notification, posted signs, etc.) are completed.</li> <li>▪ Use of portable barriers in the vicinity of sensitive receptors during construction.</li> <li>▪ Projects that require pile driving or other construction noise above 90 dB(A) in proximity to sensitive receptors, should reduce potential pier drilling, pile driving and/or other extreme noise generating construction impacts greater than 90dB(A), a set of site-specific noise attenuation measures should be completed under the supervision of a qualified acoustical consultant.</li> <li>▪ Evaluate the feasibility of noise control at the receivers by temporarily improving the noise reduction capability of adjacent buildings by the use of sound blankets for example and implement such measure if such measures are feasible and would noticeably reduce noise impacts.</li> <li>▪ Monitor the effectiveness of noise attenuation measures by taking noise measurements.</li> <li>▪ Strategically place material stockpiles between the operation and the affected dwelling to minimize noise generated from any rock-crushing or screening operations performed within 3,000 feet of any occupied residence.</li> <li>▪ Maximize the distance between noise-sensitive land uses and new roadway lanes, roadways, rail lines, transit centers, park-and-ride lots, and other new noise- generating facilities.</li> <li>▪ Construct sound reducing barriers between noise sources and noise-sensitive land uses.</li> <li>▪ Implement, to the extent feasible and practicable, speed limits and limits on hours of operation of rail and transit systems, where such limits may reduce noise impacts.</li> <li>▪ Maximize the distance of new route alignments from sensitive receptors.</li> </ul>					

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<ul style="list-style-type: none"> <li>▪ Locate transit-related passenger stations, central maintenance facilities, decentralized maintenance facilities, and electric substations away from sensitive receptors to the maximum extent feasible.</li> <li>▪ Airport projects shall conform and implement all applicable noise reduction strategies as listed in their applicable Airport Land Use Compatibility Plan.</li> </ul>					
<b>N-2: Vibration Mitigation for Transportation Projects</b>					
<p>Project sponsors of 2018 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 <i>Transit Noise and Vibration Impact Assessment</i> (FTA 2006) 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 shall be implemented to reduce vibration and groundborne noise impacts include, but are not limited to:</p> <ul style="list-style-type: none"> <li>▪ Rail Traffic <ul style="list-style-type: none"> <li>▫ Maximizing the distance between tracks and sensitive uses</li> <li>▫ Conducting rail grinding on a regular basis to keep tracks smooth</li> <li>▫ Conducting wheel truing to re-contour wheels to provide a smooth running surface and removing wheel flats</li> <li>▫ Providing special track support systems such as flating slabs, resiliently supported ties, high-resilience fasteners and ballast mats</li> <li>▫ Implementing operational changes such as limiting train speed and reducing nighttime operations</li> </ul> </li> <li>▪ Bus and Truck Traffic <ul style="list-style-type: none"> <li>▫ Constructing noise barriers</li> <li>▫ Use noise reducing tires and wheel construction on bus wheels</li> <li>▫ Use vehicle skirts (partial enclosure around each wheel with absorptive treatment) on freight vehicle wheels</li> </ul> </li> </ul>	During project permitting and environmental review.	Implementing agencies/project sponsor.			

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<b>Transportation</b>					
<b>T-1(a): Reduced Vehicle Travel</b>					
In addition to the current Tier 1 RTP projects, SJCOG shall continue to explore potential measures to reduce vehicular travel. Such measures can include, but are not limited to land-use strategies to reduce VMT, car-sharing programs, additional car and vanpool programs, and additional bicycle programs.	During project permitting and environmental review.	SJCOG			
<b>T-1(b): Evaluation of VMT</b>					
Implementing and local agencies shall evaluate VMT as part of project specific review and identify and implement measures that reduce VMT including mixed use land uses and inclusion of alternative and active transportation facilities (bike racks, transit stops, and pedestrian amenities).	During project permitting and environmental review.	Implementing agencies/project sponsor.			
<b>T-2: LOS Deficient Roadways – Reduced Congestion and Alternatives</b>					
SJCOG shall inform jurisdictions with projected LOS E and F roadway segments under the Plan of the potential need to develop a Deficiency Plan under the San Joaquin Regional Congestion Management Program at some point before 2042. SJCOG shall work with these agencies to identify and encourage changes that would increase use of alternative transportation and other means to reduce congestion.	During project permitting and environmental review.	Implementing agencies/project sponsor.			
<b>T-3: Safety Measures</b>					
Implementing and local agencies shall make safety a prime objective in the design of RTP projects, and shall plan to avoid, remedy, or mitigate such impacts in the course of project-level development and environmental review, including when incorporating active transportation and transit features into roadway projects.	During project permitting and environmental review.	Implementing agencies/project sponsor.			

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Tribal Cultural Resources					
<b>TCR-1: Tribal Cultural Resources Impact Minimization</b>					
<p>If the project sponsor determines that a project may cause a substantial adverse change to a tribal cultural resource, identified through project-specific AB 52 consultation, and measures are not otherwise identified in the consultation process required under PRC Section 21080.3.2, project sponsors shall implement the following measures where feasible and necessary to address site-specific impacts to avoid or minimize the significant adverse impacts:</p> <ul style="list-style-type: none"> <li>▪ 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.</li> <li>▪ Treating the resource with culturally appropriate dignity taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following: <ul style="list-style-type: none"> <li>▪ Protecting the cultural character and integrity of the resource</li> <li>▪ Protecting the traditional use of the resource</li> <li>▪ Protecting the confidentiality of the resource.</li> </ul> </li> <li>▪ 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.</li> </ul>	<p>During project permitting and environmental review. Additional measures listed should be implemented prior to and during construction.</p>	<p>Implementing agencies/project sponsor.</p>			

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