

FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT

Response To Comments

**REGIONAL TRANSPORTATION PLAN /
SUSTAINABLE COMMUNITIES STRATEGY
(SCH NO. 2025050609)**

FRESNO COUNCIL OF GOVERNMENTS



September 2026

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**REGIONAL TRANSPORTATION PLAN /
SUSTAINABLE COMMUNITIES STRATEGY
(SCH NO. 2025050609)**

FRESNO COUNCIL OF GOVERNMENTS

Submitted to:

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Project No. 20252196



September 2026

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LIST OF ABBREVIATIONS AND ACRONYMS

AAQA	Ambient Air Quality Analysis
AAM	Advanced Air Mobility
AB	Assembly Bill
ABM	activity-based model
ACE	Altamont Corridor Express
AEP	Association of Environmental Professionals
CalEEMod	California Emissions Estimator Model
Caltrans	California Department of Transportation
CARB	California Air Resource Board
CCR	California Code of Regulations
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CHP	California Highway Patrol
CHSRA	California High-Speed Rail Authority
CIP	Capital Improvement Plan
CNDDB	California Natural Diversity Database
CO ₂	carbon dioxide
CVFPB	Central Valley Flood Protection Board
EIR	Environmental Impact Report
EQI	California Transportation Equity Index
FMM	Fresno COG Mitigation Measure
Fresno COG	Fresno Council of Governments

FTIP	Federal Transportation Improvement Program
GHG	greenhouse gas
HRA	Health Risk Assessment
HSR	high-speed rail
I-	Interstate
MBTA	Migratory Bird Treaty Act
Measure C Renewal	Fresno County Transportation Improvement Act
MITC	Merced Intermodal Track Connector
NOA	Notice of Availability
NOC	Notice of Completion
NOD	Notice of Determination
NOP	Notice of Preparation
PEIR	Program Environmental Impact Report
PMM	Project-specific Mitigation Measure
PRC	Public Resources Code
proposed project	2026 Regional Transportation Plan/Sustainable Communities Strategy
RTP	Regional Transportation Plan
SAF	Sustainable Aviation Fuel
SB	Senate Bill
SCS	Sustainable Communities Strategy
SJRRRC	San Joaquin Regional Rail Commission
SJVAPCD	San Joaquin Valley Air Pollution Control District
SIP	State Implementation Plan
SR-	State Route

Technical Methodology	<i>Technical Methodology to Estimate Greenhouse Gas Emission Reduction for Fresno COG's 2026 RTP/SCS</i>
TCM	Transportation Control Measures
TIP	Transportation Improvement Program
TIS	Transportation Impact Study
USFWS	United States Fish and Wildlife Service
VERA	Voluntary Emission Reduction Agreement
VMT	vehicle miles traveled

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1.0 INTRODUCTION

This document comprises the Final Program Environmental Impact Report (PEIR) for the proposed 2026 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) (proposed project). It is composed of written and verbal comments received on the Draft PEIR and responses to those comments, as well as an Errata to the Draft PEIR (with ~~strikethrough~~ and double underline showing changes from the original text).

In compliance with Section 15201 of the *State CEQA Guidelines*, the Fresno Council of Governments (Fresno COG), as Lead Agency, has provided opportunities for public participation in the environmental process. The Fresno COG issued a Notice of Preparation (NOP) for the PEIR on May 13, 2025. The NOP was distributed via the State Clearinghouse (SCH) (No. 2025050609). In accordance with the *State CEQA Guidelines*, Section 15082, the NOP was circulated to responsible agencies and individuals for a period of 30 days, during which time written comments were solicited pertaining to environmental issues and topics that the PEIR should evaluate. The Fresno COG also made the NOP available on the Fresno COG's dedicated website for the proposed project. The NOP comment period ended on June 12, 2025.

In addition, the Fresno COG held a hybrid public scoping meeting (in person at the Sequoia Room of the Fresno COG's offices at 2035 Tulare Street, Suite 201, Fresno, California, and online via Zoom) on May 28, 2025, to present the proposed project and solicit input from interested parties regarding environmental issues that should be addressed in this PEIR. While no environmental issues or concerns were raised at the scoping meeting, please refer to Appendix A to the Draft PEIR for copies of written comments received in response to the NOP. In addition, Section 2.3.3 of the Draft PEIR summarizes areas of concern raised in response to the NOP.

The California Environmental Quality Act (CEQA) requires a Draft EIR to have a review period lasting at least 45 days for projects that have been submitted to the California SCH for review (*State CEQA Guidelines*, Section 150105(a)). As required by *State CEQA Guidelines* Section 15087, the Fresno COG provided a public Notice of Availability (NOA) of the Draft PEIR for the proposed project at the same time it filed a Notice of Completion (NOC) with the SCH. The Draft PEIR was circulated for public review for a period of 45 days, from July 2, 2026, through August 17, 2026.

The Fresno COG used several methods to solicit comments on the Draft PEIR. The Fresno COG placed the NOA in the local newspaper, *The Fresno Bee*, on June 21, 2026. The NOA was mailed to the last known name and address of agencies, organizations, and individuals who previously requested such notice in writing. The Fresno COG submitted the Draft PEIR to the SCH for distribution to, and review by, State agencies. The Fresno COG posted notice of the Draft PEIR's availability and made hard copies of it available at their office located at 2035 Tulare Street, Suite 201, Fresno, California 93721. In addition, the Fresno COG posted the Draft PEIR and all technical appendices on its dedicated website for the proposed project (planfresno.com).

During the public review period for the Draft PEIR, the Fresno COG hosted two public hearings to solicit additional comments on the Draft PEIR, as described below:

- **Fresno COG Policy Board Meeting (July 29, 2026, at 5:30 p.m.):** Four verbal comments received from members of the general public (Comments P-2, P-3, P-4, and P-5).
- **Additional Virtual Public Meeting (August 5, 2026, at 6:00 p.m.):** No comments received.

Verbal comments received from members of the general public were recorded, transcribed, and included in this Final PEIR.

The Fresno COG received twelve (12) comments on the Draft PEIR, including eight (8) written comments and four (4) verbal comments, within the public review period. Comments were received from State and regional agencies, and members of the general public. The comments are included and responded to in this Final PEIR. Comments that address environmental issues are responded to thoroughly. Comments that (1) do not address the adequacy or completeness of the Draft PEIR; (2) do not raise environmental issues; or (3) request the incorporation of additional information not relevant to environmental issues do not require a response pursuant to guidance for evaluation of and response to comments provided in Section 15088 of the *State CEQA Guidelines*.

Section 15088 of the *State CEQA Guidelines*, Evaluation of and Response to Comments, states:

- a) The lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response. The lead agency shall respond to comments raising significant environmental issues received during the noticed comment period and any extensions and may respond to late comments.
- b) The lead agency shall provide a written proposed response, either in a printed copy or in an electronic format, to a public agency on comments made by that public agency at least 10 days prior to certifying an environmental impact report.
- c) The written response shall describe the disposition of significant environmental issues raised (e.g., revisions to the proposed project to mitigate anticipated impacts or objections). In particular, major environmental issues raised when the lead agency's position is at variance with recommendations and objections raised in the comments must be addressed in detail, giving the reasons that specific comments and suggestions were not accepted. There must be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice. The level of detail contained in the response, however, may correspond to the level of detail provided in the comment (i.e., responses to general comments may be general). A general response may be appropriate when a comment does not contain or specifically refer to readily available information, or does not explain the relevance of evidence submitted with the comment.
- d) The response to comments may take the form of a revision to the draft EIR or may be a separate section in the final EIR. Where the response to comments

makes important changes in the information contained in the text of the draft EIR, the lead agency should either:

1. *Revise the text in the body of the EIR; or*
2. *Include marginal notes showing that the information is revised in the responses to comments.*

Information provided in this Final PEIR clarifies, amplifies, or makes minor modifications to the Draft PEIR. No significant changes have been made to the information contained in the Draft PEIR as a result of the comments received on the Draft PEIR, and no significant new information has been added that would require recirculation of the document pursuant to *State CEQA Guidelines* Section 15088.5. A revised version of the Draft PEIR has been prepared to make minor corrections and clarifications to the Draft PEIR. Therefore, as stated above, this Final PEIR includes an Errata to the Draft PEIR (with ~~striketrough~~ and double underline showing changes from the original text), written comments and transcriptions of verbal comments received on the Draft PEIR, and responses to those comments.

1.1 INDEX OF COMMENTS RECEIVED

The following is an indexed list of the agencies, organizations, and individuals that commented on the Draft PEIR. The comments received have been organized in a manner that facilitates finding a particular comment or set of comments. Each comment received is indexed or coded with a number as shown in Table A, below.

Table A: Comments Received During the Public Comment Period

Comment Code	Signatory	Date
State		
S-1	Central Valley Flood Protection Board (CVFPB)	July 6, 2026
S-2	California Department of Transportation (Caltrans) District 6	August 21, 2026
S-3	California High-Speed Rail Authority (CHSRA)	August 14, 2026
S-4	California Highway Patrol (CHP)	August 17, 2026
S-5	California Department of Fish and Wildlife (CDFW)	August 17, 2026
Regional		
R-1	San Joaquin Valley Air Pollution Control District (SJVAPCD)	August 17, 2026
R-2	San Joaquin Regional Rail Commission (SJRRRC)	August 17, 2026
Members of the General Public (Individuals and Organizations Not Affiliated with Government Agencies)		
P-1	Shute, Mihaly, & Weinberger, LLP (on behalf of Fresno Building Healthy Communities)	July 29, 2026
P-2	Sandra Celedon (on behalf of Fresno Building Healthy Communities)	July 29, 2026
P-3	Artie Panilla	July 29, 2026
P-4	Kay Burtkin	July 29, 2026
P-5	Veronica Garibay	July 29, 2026

1.2 FORMAT OF RESPONSES TO COMMENTS

Responses to each of the indexed/coded comments are provided on the following pages. The comment code numbers are provided in the upper right corner on each page of each comment, and individual points raised within each overall comment are identified by index numbers along the right-hand margin on the page they appear in each comment letter or transcript. The Fresno COG's responses to each comment immediately follow each comment and are referenced by the index numbers in the margins.

2.0 RESPONSES TO COMMENTS

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2.1 STATE AGENCIES

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STATE OF CALIFORNIA – CALIFORNIA NATURAL RESOURCES AGENCY

GAVIN NEWSOM, GOVERNOR

CENTRAL VALLEY FLOOD PROTECTION BOARD

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



July 6, 2026

Paul Herman
Deputy Director
Fresno County Council of Governments
2035 Tulare Street, Suite 201
Fresno, CA 93721
pherman@fresnocog.org

Subject: Comments for the Draft Program Environmental Impact Report, 2026 Regional Transportation Plan/Sustainable Communities Strategy, SCH# 2025050609, Fresno County

Dear Paul Herman,

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

The 2026 RTP/SCS includes all transportation modes, including motor vehicles, transit, rail, goods movement (rail freight and trucking), bicycle and pedestrian facilities, aviation systems, and transportation systems management programs and projects with the horizon year of 2049. The 2026 RTP/SCS covers the entirety of Fresno County, within which are regulated streams and designated floodways listed in **Table 1** below, that are within the Board’s permitting authority. Therefore, a Board permit may be required. Board permit information, including information on how to schedule a pre-application meeting with Board staff, is available on the [Permitting at the Central Valley Flood Protection Board website](#).

Table 1: Regulated Streams and Floodways

Waterbody Name	Board Regulated Stream	USACE 408 Federally Regulated Stream	Designated Floodway
Alta Main Canal	Yes	No	Yes
Byrd Slough	Yes	No	Yes
Cameron Slough	Yes	No	Yes
Cameron Slough tributary	Yes	No	Yes
Cole Slough	Yes	Yes	Yes
Crescent Ditch	Yes	No	No
Dog Creek (upstream of Redbank Slough)	Yes	No	No
Dog Creek (upstream of Middle Fork Kings River	Yes	No	No

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July 6, 2026

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Waterbody Name	Board Regulated Stream	USACE 408 Federally Regulated Stream	Designated Floodway
Dry Creek (upstream of canal confluence near Shields & Millbrook)	Yes	Yes	No
Dry Creek (upstream of Kaweah River)	Yes	No	No
Fish Creek	Yes	No	Yes
Fish Slough	Yes	Yes	Yes
Fresno Slough	Yes	Yes	Yes
Hughes Creek	Yes	No	Yes
James Bypass	Yes	No	Yes
Kings River	Yes	Yes	Yes
Kings River tributary	Yes	Yes	Yes
Sand Creek	Yes	No	No
San Joaquin River	Yes	No	Yes

S-1-1
cont.

Please include the Central Valley Flood Protection Board permit regulatory setting under heading 4.10.4.2 State Regulations and consider including the Board's evaluation of the project under the flood impact analysis sections 4.10.3(i)-(iv) and 4.10.4, as appropriate.

California Code of Regulations, Title 23, Waters, Division 1 (Title 23) provides standards that govern the design and construction of projects that affect the flood control works and floodways. Board staff recommends that you review Title 23 Standards, including Sections 112 (Streams Regulated and Nonpermissible Work Periods), 116 (Borrow and Excavation Activities – Land and Channel), 123 (Pipelines, Conduits, and Utility Lines), 124 (Abandoned Pipelines and Conduits), 126 (Fences and Gates), 128 (Bridges), 131 (Vegetation), and 132 (Bicycle Trails). Any modification to the flood control works or floodways, and any deviation or variation from the standards will require approval from the Board.

S-1-2

Responsibility of the Board

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

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

S-1-3

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July 6, 2026

Page 3

Title 33, Section 408. The State's objectives include fulfilling the USACE's expectations pursuant to the assurances provided to the USACE.

S-1-3
cont.

Board Permit

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

S-1-4

Flood Impacts Analysis

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

- Jeopardize directly or indirectly the physical integrity of levees or other works,
- Obstruct, divert, redirect, or raise the surface level of design floods or flows, or the lesser flows for which protection is provided,
- Cause significant adverse changes in water velocity or flow regimen,
- Impair the inspection of floodways or project works,
- Interfere with the maintenance of floodways or project works,
- Interfere with the ability to engage in flood fighting, patrolling, or other flood emergency activities,
- Increase the damaging effects of flood flows,
- Be injurious to, or interfere with, the successful execution, functioning, or operation of any adopted plan of flood control, or
- Adversely affect the State Plan of Flood Control, as defined in the California Water Code

S-1-5

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

Closing

The potential risks to public safety, including increased flood risks, need to be considered when developing proposed projects that seek to modify flood control works or the hydrology of the water ways. Board staff is available to discuss any questions you have regarding the above

S-1-6

Fresno County Council of Governments

July 6, 2026

Page 4

comments. Please contact Jordan Robbins at (916) 524-3454, or via email at Jordan.Robbins@cvfood.ca.gov if you have any questions.

S-1-6
cont.

Sincerely,

Jamie Silva

Jamie Silva
Environmental Program Manager

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

Steve Lamb
Steve.Lamb@cvflood.ca.gov

Central Valley Flood Protection Board (CVFPB)

Comment Code: S-1

Date: July 6, 2026

Response to Comment S-1-1

This comment provides introductory remarks, summarizes the proposed project, and lists the regulated streams and designated floodways in the Fresno COG Region that are within the CVFPB's permitting authority.

This comment, which does not raise concerns regarding the adequacy of the information or analysis provided in the Draft PEIR, is noted. No further response is required.

Response to Comment S-1-2

This comment requests that the CVFPB permitting authority be included in the Regulatory Setting and Impact Analysis subsections of Draft PEIR Section 4.10, Hydrology and Water Quality, as applicable. The comment also recommends that Fresno COG review the standards described in California Code of Regulations (CCR), Title 23, Waters, Division 1, which govern the design and construction of projects that affect flood control works and floodways.

The following text has been added to Page 4.10-20 of Section 4.10, Hydrology and Water Quality, of the Draft PEIR:

Central Valley Flood Protection Board Permit. The Central Valley Flood Protection Board (CVFPB) is the State's regulatory agency responsible for enforcing appropriate standards for the construction, maintenance, and operation of the flood control system that protects life, property, and habitat in California's Central Valley. The Board serves as the State coordinator between local flood management agencies and the federal government, with the goal of providing the highest level of flood protection possible to California's Central Valley. Per CCR Title 23, Division 1, Section 6, approval by the CVFPB is required for all proposed work or uses, including the alteration of levees, within any area for which there is an Adopted Plan of Flood Control within CVFPB jurisdiction. In addition, permits from CVFPB are required for all proposed encroachments within a floodway, on adjacent levees, and within any Regulated Stream as identified in Title 23. Specifically, CVFPB jurisdiction includes the levee section, the waterward area between project levees, a minimum 10-foot-wide strip adjacent to the landward levee toe, the area within 30 feet from the top of bank(s) of Regulated Streams, and inside CVFPB Designated Floodways. Activities outside of these limits which could adversely affect Federal-State flood control facilities, as determined by the CVFPB, are also under the CVFPB's jurisdiction. Permits may also be required from CVFPB for existing unpermitted encroachments or where it is necessary to establish the conditions normally imposed by permitting, including where responsibility for the encroachment has not been clearly established or ownership or uses have been changed.

In addition, the text in Section 4.10, Page 4.10-38 has been revised as follows:

Flooding. As described in Section 4.10.4, certain regulations apply specifically to watercourses such as streams, rivers, and creeks. As applicable, future transportation improvement projects and land use developments located in the vicinity of a watercourse or multiple watercourses would be required to obtain all permits and authorizations (e.g., a Section 1602 Lake and Streambed Alteration Agreement) from agencies responsible for regulation of the affected watercourse(s), which may include the USACE, the CVFPB, the Central Valley RWQCB, CDFW, the California Coastal Commission, and local jurisdictions, and would be required to comply with all conditions issued by applicable agencies.

These revisions do not identify a new impact or provide significant new information warranting recirculation of the Draft PEIR. No further response to this comment is required.

Response to Comment S-1-3

This comment describes the role and the regulatory authority of the CVFPB.

This comment, which does not raise concerns regarding the adequacy of the information or analysis provided in the Draft PEIR, is noted. No further response is required.

Response to Comment S-1-4

This comment describes actions subject to approval by the CVFPB and areas within the CVFPB's jurisdiction.

This comment, which does not raise concerns regarding the adequacy of the information or analysis provided in the Draft PEIR, is noted. No further response is required.

Response to Comment S-1-5

This comment describes the conditions under which the CVFPB may deny a permit and states that the CVFPB will review and consider the direct and indirect environmental effects of future transportation improvement projects and land use developments reflected in the 2026 RTP/SCS.

This comment, which does not raise concerns regarding the adequacy of the information or analysis provided in the Draft PEIR, is noted. No further response is required.

Response to Comment S-1-6

This comment reiterates the importance of considering flood risks of proposed projects and provides concluding remarks.

This comment, which does not raise concerns regarding the adequacy of the information or analysis provided in the Draft PEIR, is noted. No further response is required.

California Department of Transportation

DISTRICT 6 OFFICE
1352 West Olive Avenue
Fresno, CA 93728-2818
TTY 711
www.dot.ca.gov



August 21, 2026

Draft 2026 RTP/SCS
Draft Program EIR
Draft 2027 FTIP
Draft Conformity Analysis for 2027 FTIP & 2026 RTP
REVIEW LETTER

SENT VIA EMAIL

Mr. Robert Phipps
Executive Director
Fresno Council of Governments
2035 Tulare St., Suite 201
Fresno, CA 93721

Dear Mr. Phipps:

We appreciate the opportunity to review the Fresno Council of Governments (FCOG) Draft 2026 Regional Transportation Plan/Sustainable Community Strategy (RTP/SCS), Draft 2026 Regional Transportation Plan/Sustainable Community Strategy Program Environmental Impact Report (EIR), Draft 2027 Federal Transportation Improvement Program (FTIP), and Draft Conformity Analysis for the 2027 FTIP and the 2026 RTP. District 6, along with Caltrans HQ, have reviewed the Draft documents and jointly offer the following comments.

S-2-1

OFFICE OF MULTIMODAL TRANSPORTATION PLANNING-DISTRICT 6

REGIONAL PLANNING-DISTRICT 6

FCOG has demonstrated a strong commitment to support their 20-year planning horizon with focus on the region's transportation options, sustainable growth, economy, improving air quality, and building healthier communities.

S-2-2

FCOG continues to actively pursue innovative strategies in an effort to improve the multimodal transportation network that supports its communities. Caltrans acknowledges the ongoing partnerships that FCOG participates in and coordinates with its member agencies as well as the extensive work and collaboration with the transit agencies to serve residents within the region

FCOG's extensive public outreach efforts utilize a diverse set of strategies that have been outlined in the Public Participation Plan helps FCOG obtain feedback from the

public that ensures that its communities' needs and goals are reflected in the document.

Minor Comments:

- Chapter 2, Page 12, it appears that the SB 743 Local Assistance Program section may be missing a header similar to what was done for the previous section, "Fresno County Mobility Hubs Feasibility Study".
- Chapter 3, Page 25, the Harris Ranch Airport section paragraph ends with the "Mendota (William R. Johnston) Airport." which appears to be a text meant for the next section discussing the Mendota Airport.
- Chapter 5, Page 11, Scenario D section on the last paragraph, "Moreso..." appears to be a typo for "More so..."

S-2-2
cont.

SYSTEM PLANNING-FREIGHT-DISTRICT 6

FCOG is recommended to add the following documents to the Fresno County RTP/SCS Plan within the Goods Movement section. A major Caltrans freight plan that is recommended to be added is the 2023 California Freight Mobility Plan, which currently is in the process of being updated for 2027. The 2022 California Statewide Truck Parking Study is also an important resource for studying existing and future truck parking facilities.

S-2-3

TRANSIT-DISTRICT 6

FCOG has demonstrated a continued commitment to improving transportation throughout Fresno County. Through collaboration with local jurisdictions, transit providers, Caltrans District 6, tribal governments, and regional partners, FCOG has advanced a transportation system that enhances mobility, expands access to transportation, supports the local economy, and provides residents and visitors with a broader range of travel options. Combined with its success in securing state and federal funding, these efforts have strengthened public transit services and expanded transportation opportunities throughout the region.

The existing transit system in Fresno County plays a vital role in the region's multimodal transportation network by providing access to employment, education, healthcare, shopping, and other essential services. The transit network includes Fresno Area Express (FAX), Clovis Transit, the Fresno County Rural Transit Agency (FCRTA), Greyhound, Orange Belt Stage Lines, and Transportes Intercalifornias.

S-2-4

A major achievement for FCRTA is the completion of the David T. Cardenas Regional Operations and Maintenance Facility in Selma. This modern facility consolidates bus maintenance, dispatch, administration, training, and fleet operations into a single location, improving operational efficiency and service delivery. The facility is designed to support both compressed natural gas (CNG) and battery-electric buses and

includes electric bus charging infrastructure, solar power, and dedicated employee training space. As FCRTA transitions to a zero-emission fleet, the facility will serve as its primary operations center, supporting more reliable transit service and cleaner transportation throughout rural Fresno County.

Continued coordination among FCOG, transit providers, and the California High-Speed Rail system will be essential to ensure convenient first- and last-mile connections between local transit services and future rail stations. Collectively, these transportation services and investments support key travel corridors, including Interstate 5 and State Routes (SR) 33, 41, 43, 99, 145, 168, 180, 198, 201, and 269. These corridors connect urban centers, rural communities, agricultural areas, recreational destinations, and major freight markets throughout California.

S-2-4
cont.

FCOG is encouraged to continue pursuing state and federal funding opportunities, including the Sustainable Communities Planning Grant Program, to support future transit planning studies and first- and last-mile improvements throughout Fresno County.

Ongoing coordination among Caltrans, FCOG, local jurisdictions, transit providers, and the California High-Speed Rail Authority will improve transit mobility, strengthen connections between transportation modes, and help create a safer, more efficient, and better-connected transportation system for Fresno County.

EQUITY AND COMMUNITY ENGAGEMENT-DISTRICT6

- FCOG conducted outreach to address transportation, community priorities, and infrastructure in Fresno County. Their efforts aim to improve safety, mobility, and connectivity for all, using both in-person and digital methods for community engagement.
 - FCOG employs a variety of strategies to connect with community members and stakeholders —through flyers, updates on the FCOG website, public outreach events, annual reports, emails, newsletters, speeches, and public hearings. These methods were used to inform, involve, and collect feedback from the public, guiding transportation planning and improvements.
 - The organization used online conferences, webinars, and social media to engage more people and enhance government relations.
- FCOG consideration of equity through collaboration with the Environmental Justice (EJ) Subcommittee—an advisory group under the Transportation Technical Committee (TTC), which provides technical guidance on

S-2-5

transportation projects—to address the needs of historically underrepresented populations.

- FCOG's outreach and equity initiatives have led to tangible improvements. For instance, incorporating community feedback into transportation programs.
- FCOG's dedication to listening to residents, prioritizing equity, and transparently responding to community needs. FCOG's efforts continue to build trust and empower stakeholders across Fresno County.

S-2-5
cont.

Caltrans recommends that FCOG use the California Transportation Equity Index (EQI) 5.0 for its equity work. EQI is a comprehensive data tool designed to identify communities experiencing significant transportation challenges. For instance, by utilizing this index, FCOG may benefit more from state and federal funding to areas with high traffic hazards and limited transit access.

LOCAL DEVELOPMENT REVIEW-DISTRICT 6

General Comments:

The RTP/SCS is well organized and presents a comprehensive regional vision that integrates transportation, land use, housing, environmental stewardship, and equity. The plan appropriately recognizes the importance of coordination among local agencies, Fresno COG, Caltrans, and other transportation partners throughout the planning process.

S-2-6

Comments:

1. While the RTP discusses regional growth and multimodal transportation, it would benefit from additional language recognizing that future local development should preserve the operational integrity and safety of the State Highway System. As growth occurs adjacent to state facilities, access management, intersection spacing, interchange preservation, and operational improvements should remain priorities.
2. Consider including additional discussion describing how local General Plans, Specific Plans, Transportation Impact Studies (TISs), and development projects should remain consistent with regional transportation assumptions identified in the RTP.

This linkage would help ensure:

- consistency between local land use decisions and regional transportation investments;
- preservation of planned SHS improvements; and
- early coordination with Caltrans during project development.

S-2-7

3. The financially constrained project list appropriately includes several operational improvements, rehabilitation projects, interchange improvements, and roundabouts on the State Highway System. Continued investment in operational improvements that improve safety and mobility should remain a regional priority.
4. Although individual development projects may have limited impacts, cumulative growth throughout Fresno County can significantly affect State Route corridors and interchange operations.

Additional discussion encouraging:

- corridor-level planning,
 - cumulative traffic analysis,
 - early identification of needed improvements, and
 - phased implementation strategies would better support long-term system preservation.
5. The RTP should continue encouraging local agencies and project applicants to coordinate with Caltrans during the earliest planning phases for projects affecting the SHS.

Early coordination helps:

- identify transportation issues sooner;
 - reduce project delays;
 - improve project design;
 - identify opportunities for multimodal improvements; and
 - improve consistency with State transportation policies.
6. The RTP appropriately emphasizes active transportation, transit, and complete streets. Continued implementation should recognize that improvements located on or adjacent to the State Highway System must balance multimodal accessibility with operational efficiency and highway safety.
 7. The RTP includes transportation performance measures and system performance reporting. Continued use of performance-based planning is encouraged, particularly where measures relate to:
 - safety,
 - freight movement,
 - reliability,
 - multimodal accessibility,
 - State Highway System operations.

These measures provide a strong foundation for future investment decisions and coordination with Caltrans.

8. As local jurisdictions implement the RTP, transportation analyses prepared for individual development projects should remain consistent with regional assumptions while evaluating project-specific operational and safety impacts on the SHS.

Transportation Impact Studies should continue to identify:

- appropriate mitigation strategies,
- operational improvements,
- multimodal accommodations,
- fair-share participation where appropriate.

S-2-13

Overall, Caltrans District 6 LDR supports the regional planning framework presented in the Draft 2026 RTP/SCS. The comments above are intended to strengthen further coordination between regional transportation planning and local development review while supporting the long-term preservation, safety, and operational performance of the State Highway System.

CLIMATE CHANGE-DISTRICT 6

Commendations:

- Climate adaptation is explicitly integrated into the RTP goals, project evaluation criteria, and PEIR analysis.
- Prioritizes compact, infill, and transit-oriented development, which reduces exposure to climate hazards and supports adaptation.
- The PEIR includes robust, enforceable mitigation measures for wildfire, flooding, water supply, and energy resilience.
- The plan calls for ongoing regional forums and partnerships for wildfire resilience and climate action planning.
- The RTP is consistent with SB 375, AB 32, SB 32, and the latest CARB Scoping Plan, and references the County's CCAP-A.
- All required federal and state consistency checks are met.
- The FTIP is a direct, financially constrained subset of the RTP/SCS constrained project list.
- Air quality conformity is demonstrated for both the FTIP and RTP/SCS using the same modeling, assumptions, and project lists.
- TCMs, RACM, and SCS strategies are implemented and tracked in both documents.
- Performance management and GHG targets are aligned.
- The public process and adoption schedule are coordinated.

S-2-14

Considerations:

- While referenced, the RTP/SCS can consider prioritizing nature-based adaptation (e.g., urban greening, riparian restoration) as a primary strategy for flood, heat, and fire resilience.

- The RTP/SCS can consider periodic updates as new climate science and hazard data become available, especially regarding extreme heat, drought, and wildfire projections.

S-2-14
cont.

DIVISION OF AERONAUTICS-HEADQUARTERS (HQ)

The Division commends FCOG for their efforts to update the Aviation Elements of their draft RTP. The Division notes that the RTP discussed the airports in the county and acknowledged their roles in Fresno's multimodal network strategies. The RTP also covered topics such as airport land use compatibility, improving access to regional airports, aviation training and innovation programs, and climate impacts and resiliency.

The Division recommends that regional planning agencies prepare, when appropriate, to address the following areas of future focus:

- Advanced Air Mobility (AAM) Services
- Wayside equipment for electrified aircraft, and electric aviation in general.
- Sustainable Aviation Fuel (SAF), currently in the testing stages for commercial aircraft, but will eventually trickle down to general aviation.

Housing Development & Preventing Encroachment on Airports

S-2-15

In planning for additional housing development, special care must be included to prevent encroachment on airports, sustain healthy communities with a focus on equity when siting future development, and preserve the viability of the aviation system as an economic engine for the region.

Additional Resources:

California Airport Land Use Planning Handbook: <https://dot.ca.gov/-/media/dot-media/programs/aeronautics/documents/californiaairportlanduseplanninghandbook-all1y.pdf>

California Department of Transportation State Dollars for Your Airport: <https://dot.ca.gov/programs/transportation-planning/division-of-transportation-planning/-/media/dot-media/programs/aeronautics/documents/1016-state-dollars-for-your-airport-october-2019-a11y.pdf>

Caltrans Local Airport Loan Program: [Airport Loans | Caltrans](#)

Caltrans Aeronautics provides an Airport Land Use Compatibility training program tailored for Airport Land Use Commissions (ALUC) and local planning staff upon

request. This program is designed to familiarize participants with the airport land use compatibility process, criteria, and to address any specific questions or concerns that Commissioners or planning staff may have.

S-2-15
cont.

Feel free to contact us at aeronautics-planning@dot.ca.gov for any inquiries regarding our comments or to express interest in scheduling a training session.

DIVISION OF MASS TRANSPORTATION-HEADQUARTERS (HQ)

To support this document, we offer the following input grounded in the Caltrans' Director's Policy for Transit (DP-40). DP-40 establishes Caltrans' commitment to improving transit access and integrating transit-supportive infrastructure within the State Highway System. In keeping with the policy's direction, we encourage continued emphasis on strategies that strengthen multimodal connectivity, enhance transit accessibility, and align statewide planning efforts with the needs of local transit providers and the communities they serve. These principles can help ensure the document reflects DP-40's intent to advance coordinated, reliable, and accessible transit mobility across diverse regions.

S-2-16

OFFICE OF AIR QUALITY TRANSPORTATION CONFORMITY-HEADQUARTERS (HQ)

- 40 CFR § 93.110(e): Caltrans recommends referencing Chapter 4 to more clearly demonstrate that the conformity determination is supported by the plan's goals, policies, and transportation strategies.
- 40 CFR § 93.118(d): Caltrans recommends citing the chapter in its entirety when documenting the regional emissions analysis and the basis for the conformity finding, rather than referencing individual sections, to ensure it is addressed comprehensively.

S-2-17

DIVISION OF FREIGHT-HEADQUARTERS (HQ)

Thank you for the opportunity to review and provide feedback on the Draft 2026 Fresno Council of Governments (FCOG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). We appreciate the considerable effort invested in this plan and offer the following comments and recommendations.

There is an opportunity to further strengthen the plan by more fully addressing goods movement. The draft RTP/SCS could be strengthened through the development of a Fresno-specific regional long-range goods movement vision to guide freight planning, decision-making, and investment. We note that draft relies primarily on Appendix C (the Valleywide section covering the eight San Joaquin Valley MPO regions). The 2024 CTC Regional Transportation Plan Guidelines, Section 6.12, treat goods movement as a

S-2-18

distinct and essential component of the plan, parallel to highways, transit, bicycle and pedestrian facilities, and aeronautics.

The Valleywide chapter provides substantial information on the San Joaquin Valley's role in statewide and national freight, prior and ongoing studies, project identification, and future directions. It includes Valleywide goals, objectives, and strategies and lists projects across the eight-county region, some of which are Fresno-specific. This material is valuable for multi-MPO coordination and is consistent with federal encouragement of interregional planning, especially given that major corridors such as I-5 and SR 99 and associated supply chains cross MPO boundaries. However, we note that the Valleywide content was developed independently of the FCOG RTP/SCS process and operates under a distinct methodology and set of goals, objectives, strategies, and project selection criteria that may not fully aligned with or incorporated into the FCOG RTP/SCS project evaluation criteria, goals, policies, actions, or performance framework. The discussion remains Valleywide and does not isolate or prioritize Fresno-specific needs, multimodal freight network elements, truck parking, electrification strategies, or supporting data and analysis unique to Fresno County's agricultural, logistics, and urban-rural mix.

While the 2024 CTC Guidelines and federal rules support multi-jurisdictional coordination, they also require each MPO's RTP to address regional needs within its metropolitan planning area (23 CFR 450.324). The Valleywide content complements but does not necessarily substitute for a Fresno-specific analysis integrated into the core plan. Goods movement projects developed under a separate process with different goals, objectives, strategies, and selection methodologies may risk inconsistency with the financially constrained RTP project list and the FTIP. Addressing this with a crosswalk or clear statement of how those projects are filtered through FCOG's evaluation criteria and financial constraint process before programming in the FTIP could be helpful to strengthen the connection.

S-2-18
cont.

We also note further opportunities to address the federal planning factors in 23 CFR 450.306 that require the metropolitan transportation planning process to consider projects, strategies, and services that support the economic vitality of the metropolitan area; increase accessibility and mobility of people and freight; and enhance integration and connectivity of the transportation system, across and between modes, for people and freight. The same opportunity exists relative to Section 6.12 of the 2024 CTC Guidelines.

It's noted that within the main body of the document, Fresno-specific goods movement receives attention in various chapters. Chapter 2 (Accomplishments) includes a brief section focusing primarily on the TradePort California intermodal rail initiative and coordination on Valleywide studies. Chapter 3 ("Fresno Today") provides

dedicated sections for public transportation, aviation, active transportation, and rail. However, we note that regional goods movement receives no independent treatment and appears only as a passing phrase. On page 12, the plan notes Fresno County's position as the world's largest producer of many commodities and recognizes the significant farm-to-market travel demand affecting local roads and the state highway system. The plan could be strengthened by identifying specific routes or constituting a comprehensive, Fresno-specific long-range freight vision. There is an opportunity to analyze the unique challenges associated with transporting agricultural products, seasonality, perishability, cold-chain logistics, and the prevalence of short-haul trips from farms to processors, as well as agricultural-specific deficiencies, strategies, and projects. These distinct demand patterns and infrastructure needs differ from those of general freight or passenger travel and may warrant explicit attention given agriculture's defining role in the regional economy.

S-2-18
cont.

This approach can also be applied to the goals, policies, and actions of Chapter 4. Goods movement appears as a secondary consideration rather than a core modal element with its own analysis, objectives, and investment priorities. Goal 1 (Improved Mobility and Accessibility for All) and Goal 2 orient primarily toward passenger mobility, equity, transit, active transportation, VMT reduction, housing, and farmland conservation; but does not substantively address trucks, freight railroads, or air cargo. Goal 3 notes that improving efficiency and reducing congestion benefits both residents and goods movement, but the emphasis is on single-occupancy vehicle reduction, modal shift to bicycling, walking, and micromobility, and VMT reduction remains passenger-focused. Because the majority of regional freight moves by truck on shared roadways, broad VMT-reduction prioritization without corresponding freight-specific capacity, operational, or reliability strategies may create tensions with goods movement needs. Federal and CTC guidance recognize that freight demand is derived and that truck travel reliability is a distinct national performance goal under 23 USC § 150(b) and 23 CFR Part 490 (PM3). The plan could further reconcile or mitigate this potential conflict.

S-2-19

Goal 4 is the strongest freight-related element. Policy 18 and Actions 22–23 respond directly to economic vitality and freight factors. However, we note Action 23 functions more as a high-level strategy statement rather than a concrete, measurable action with clear Fresno-specific implementation steps, timelines, or performance linkages. We recommend including Fresno-specific freight objectives, performance measures, or targets beyond the federal PM3 adoption. Goal 5 addresses the advancement of sustainable and efficient freight movement in an implicit manner; but it does not explicitly support clean freight technology or establishes direct connections between actions and freight electrification, zero-emission corridors, or infrastructure tailored to the region's agricultural and logistics requirements.

To strengthen the plan, we recommend elevating a concise but substantive Fresno-region freight vision, needs assessment, priority network and corridors, and performance linkages into the main body of the RTP. The plan could explicitly state how Valleywide projects were or will be evaluated against the same RTP/SCS goals, objectives, and scoring criteria used for the constrained project list, referencing 23 CFR 450.324(f) and 450.306(b). A dedicated Goods Movement section for the Fresno region could provide the opportunity to address freight modes; display and incorporate essential current, baseline, and forecast data and analysis needed to develop a holistic multimodal regional freight vision; and align with both federal requirements and the 2024 CTC Guidelines. We also suggest providing a comprehensive map that shows the hierarchy and priorities of routes, highlights the FCOG Regional Multimodal Freight Network, and marks segments of both the Federal Multimodal Freight Network and the National Highway Freight Network within the area. Additionally, it may be helpful to indicate locations such as truck parking facilities, freight railroads (including Class I and short lines), air cargo airports, freight hubs, intermodal transfer points, distribution centers, and sites of freight projects linked to both fiscally constrained and unconstrained lists. Presenting comprehensive data on truck volumes, five-axle truck usage, congestion and delays, the impact of heavy trucks on pavement deterioration, locations of truck-involved collisions, and truck and freight-rail bottlenecks would further strengthen the plan.

S-2-19
cont.

Truck parking, a critical factor for safety, security, and economic competitiveness, could be addressed for the Fresno region. Given Fresno County's location along I-5 and SR 99 and its role in statewide, national, and international goods movement, the plan could include a high-level discussion of truck parking challenges, needs, locations, and access to the STAA truck network. Where region-specific information is limited, the plan can draw directly on the 2022 California Statewide Truck Parking Study, which documents shortages along these corridors and recommends regional implementation plans developed in cooperation with local jurisdictions and transportation planning agencies. Incorporating this statewide analysis could help address driver safety, operational efficiency, and corridor reliability.

S-2-20

While the plan advocates cleaner technologies and electrification for freight, it does not directly address the significant operational challenges these pose for goods movement, particularly for agricultural freight. From our experience, issues such as harvest seasonality, cold-chain logistics and refrigeration demands, reduced vehicle range, and weight restrictions arising from heavy payloads combined with battery weight deserve greater attention. Explicit consideration of hydrogen fuel-cell technology for long-haul freight and agricultural trucking could also be beneficial. By addressing these elements and integrating findings from the California Freight Mobility Plan, rather than relying primarily on a Valleywide chapter inserted into an appendix,

S-2-21

the RTP/SCS can more effectively identify system deficiencies, predict future performance, support a robust 20-year freight vision for the Fresno region.

S-2-21
cont.

These comments are intended to support FCOG in developing a more comprehensive RTP while maintaining the valuable multi county coordination underway. We appreciate the extensive effort invested in preparing this draft and the opportunity to provide these recommendations.

End of Comments

Caltrans appreciates your attention to our feedback and look forward to its inclusion in the Final FCOG documents. The RTP is a great opportunity to document the planning process and provide the public with a clear overview of anticipated growth and development. FCOG is encouraged to reference the 2024 RTP guidelines and include complete streets information to strengthen its strategies and address challenges.

S-2-22

Please provide an updated RTP Checklist and a copy of the final RTP, including appendices, the environmental document, and a digital version of all materials.

If you have any questions, please call or email Christopher Xiong at christopher.xiong@dot.ca.gov or (559) 908-7064.

Sincerely,

Braden Duran

Braden Duran, Office Chief
District 6 Multimodal Transportation Planning

Copy via email:
Caltrans D6 – Philip Vallejo, Lorena Mendibles
Caltrans HQ – Brenda Caruso, Camilo Juarez

2.1.1 California Department of Transportation (Caltrans) District 6

Comment Code: S-2

Date: August 21, 2026

Because this comment does not raise concerns regarding the adequacy of the information or analysis provided in the Draft PEIR, the Fresno COG is not required under CEQA to address these comments in the Final PEIR. However, in order to provide a consistent, accessible, and transparent location for all comment responses, the Fresno COG has elected to address comments related to the 2026 Draft RTP/SCS, Draft 2027 Federal Transportation Improvement Program (FTIP), and Draft Conformity Analysis for the 2027 FTIP and the 2026 RTP within this Final PEIR. It should be noted that the comments below do not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft PEIR, or that impacts would be substantially more severe than those identified in the Draft PEIR.

Response to Comment S-2-1

This comment provides introductory remarks.

Thank you for the comment. The Fresno COG appreciates Caltrans' support in the development of the proposed 2026 RTP/SCS and its supporting documents.

Response to Comment S-2-2

This comment acknowledges the Fresno COG's coordination and public outreach efforts and suggests minor text edits in the proposed 2026 RTP/SCS document for clarity.

Thank you for the comment. Edits to the document have been made to reflect the requested changes for clarity. It should be noted that Chapter 3.0, Errata, of this Final PEIR only presents specific changes to the text of the Draft PEIR. The updated RTP Checklist and Final RTP will be submitted to Caltrans once the Fresno COG Policy Board approves the final documents.

Response to Comment S-2-3

This comment recommends that the Fresno COG add the following documents to the proposed 2026 RTP/SCS within the Goods Movement section: the 2023 California Freight Mobility Plan, which currently is in the process of being updated for 2027, and the 2022 California Statewide Truck Parking Study.

Thank you for the comment. The 2023 California Freight Mobility Plan and the 2022 California Statewide Truck Parking Study have been added to the Goods Movement section in Chapter 2 of the RTP/SCS. It should be noted that Chapter 3.0, Errata, of this Final PEIR only presents specific changes to the text of the Draft PEIR. The updated RTP Checklist and Final RTP will be submitted to Caltrans once the Fresno COG Policy Board approves the final documents.

Response to Comment S-2-4

This comment acknowledges the Fresno COG's efforts to improve transportation throughout Fresno County and states that the County's transit system plays a vital role in the transportation network. The comment describes the recent completion of the David T. Cardenas Regional Operations and Maintenance Facility in Selma and encourages the Fresno COG to pursue funding opportunities for transit studies and engage in ongoing coordination with Caltrans, local jurisdictions, transit providers, and the California High-Speed Rail Authority (CHSRA).

Thank you for the comment. The Fresno COG will continue to coordinate and collaborate with our local transit providers as well as the CHSRA to improve mobility in Fresno County.

Response to Comment S-2-5

This comment summarizes equity-related actions undertaken by the Fresno COG during the RTP/SCS process and recommends that the Fresno COG use the California Transportation Equity Index (EQI) 5.0 for its equity work to potentially benefit more from State and federal funding to areas with high traffic hazards and limited transit access.

The Fresno COG appreciates Caltrans' recognition of the equity and community engagement efforts undertaken for the 2026 RTP. The Fresno COG staff consulted with Caltrans staff following the release of the first version of the EQI and during the early stages of RTP/SCS development. The EQI was used as a reference for identifying gaps in transit, bicycle, and pedestrian accessibility during project evaluation. The Fresno COG also incorporated the EQI Crash Exposure to identify areas with elevated crash exposure and the Transportation-Related Pollution Exposure to identify communities experiencing greater transportation-related pollution exposure as part of the proposed 2026 RTP/SCS equity analysis.

The Fresno COG will continue to explore the EQI and consider opportunities to more comprehensively incorporate it into future RTP/SCS activities, including public outreach and engagement, project evaluation and prioritization, and the overall benefits and impacts analysis.

Response to Comment S-2-6

This comment states that the proposed 2026 RTP/SCS is well organized and suggests the inclusion of additional language recognizing that future local development should preserve the operational integrity and safety of the State Highway System by prioritizing access management, intersection spacing, interchange preservation, and operational improvements.

Thank you for the comment.

Response to Comment S-2-7

This comment requests that the Fresno COG consider including additional discussion describing how local General Plans, Specific Plans, Transportation Impact Studies (TISs), and development projects should remain consistent with regional transportation assumptions identified in the RTP and states the benefits of this addition.

Thank you for the comment.

Response to Comment S-2-8

This comment states that the financially constrained project list included in the proposed 2026 RTP/SCS appropriately includes several operational improvements, rehabilitation projects, interchange improvements, and roundabouts on the State Highway System. The comment also states that continued investment in operational improvements that improve safety and mobility should remain a regional priority.

Thank you for the comment. The Fresno COG will continue to promote and study operational safety and mobility improvements and maintain these improvements as a significant regional priority.

Response to Comment S-2-9

This comment states that cumulative growth throughout Fresno County can significantly affect State Route corridors and interchange operations and suggests the inclusion of additional discussion encouraging corridor-level planning, cumulative traffic analysis, early identification of needed improvements, and phased implementation strategies.

Thank you for the comment.

Response to Comment S-2-10

This comment suggests that the proposed 2026 RTP/SCS continue encouraging local agencies and project applicants to coordinate with Caltrans during the earliest planning phases for projects affecting the State Highway System and describes the benefits of early coordination.

Thank you for the comment.

Response to Comment S-2-11

This comment states that the proposed 2026 RTP/SCS appropriately emphasizes active transportation, transit, and complete streets, and suggests that continued implementation should recognize that improvements located on or adjacent to the State Highway System must balance multimodal accessibility with operational efficiency and highway safety.

Thank you for the comment.

Response to Comment S-2-12

This comment states that the proposed 2026 RTP/SCS includes transportation performance measures and system performance reporting and encourages the continued use of performance-based planning, particularly where measures relate to safety, freight movement, reliability, multimodal accessibility, and State Highway System operations.

Thank you for the comment.

Response to Comment S-2-13

This comment states that transportation analyses prepared for individual development projects should remain consistent with regional assumptions while evaluating project-specific operational and safety impacts on the State Highway System and TISs should continue to identify appropriate mitigation strategies, operational improvements, multimodal accommodations, and fair-share participation where appropriate. This comment also expresses overall support for the regional planning framework presented in the proposed 2026 RTP/SCS.

Thank you for the comment.

Response to Comment S-2-14

This comment commends the climate change component of the proposed 2026 RTP/SCS and suggests that the document consider prioritizing nature-based adaptation (e.g., urban greening, riparian restoration) as a primary strategy for natural hazard resistance, as well as periodic updates as new climate science and hazard data become available.

Thank you for the comment.

Response to Comment S-2-15

This comment recommends that regional planning agencies prepare to address future focus on Advanced Air Mobility (AAM) Services, wayside equipment for electrified aircraft, electric aviation in general, and Sustainable Aviation Fuel (SAF). The comment also notes that planning for additional housing development should prevent encroachment on airports, sustain healthy communities, promote equity, and preserve the economic viability of the aviation system.

Thank you for the comment.

Response to Comment S-2-16

This comment encourages, consistent with the Caltrans Director's Policy for Transit (DP-40), continued emphasis on strategies that strengthen multimodal connectivity, enhance transit accessibility, and align statewide planning efforts with the needs of local transit providers and the communities they serve.

Thank you for the comment.

Response to Comment S-2-17

This comment recommends referencing Chapter 4 of the proposed 2026 RTP/SCS to more clearly demonstrate that the conformity determination is supported by the plan's goals, policies, and transportation strategies. This comment also recommends citing Chapter 4 in its entirety when documenting the regional emissions analysis and the basis for the conformity finding, rather than referencing individual sections, to ensure it is addressed comprehensively.

Thank you for the comment. A reference to Chapter 4 has been added to the Conformity Checklist to document the Transportation Control Measures (TCM) Findings for the Transportation Improvement Program (TIP) and RTP section and clarify that the conformity determination is supported by the 2026

RTP's goals, policies, and transportation strategies. The entirety of Chapter 1 was cited to clearly identify the appropriate years for the regional emissions analysis and the applicable State Implementation Plan (SIP) budgets. It should be noted that Chapter 3.0, Errata, of this Final PEIR only presents specific changes to the text of the Draft PEIR. The updated RTP Checklist and Final RTP will be submitted to Caltrans once the Fresno COG Policy Board approves the final documents.

Response to Comment S-2-18

This comment states that there is an opportunity to strengthen the proposed 2026 RTP/SCS by more fully addressing goods movement, specifically a Fresno-specific regional long-range goods movement vision in addition to the document's existing discussion of valleywide content. The comment suggests achieving federal planning guidelines by providing a clear statement of how Fresno-specific goods movement projects are filtered through the Fresno COG's evaluation criteria and financial constraints process before programming in the FTIP.

Thank you for the comment. The Fresno COG will strive to include a more robust evaluation of goods movement policies and projects and will conduct a Fresno-centric goods movement analysis in future iterations of the RTP/SCS. Additional language has been added to the Goods Movement section in Chapter 2 to highlight State freight planning efforts. It should be noted that Chapter 3.0, Errata, of this Final PEIR only presents specific changes to the text of the Draft PEIR. The updated RTP Checklist and Final RTP will be submitted to Caltrans once the Fresno COG Policy Board approves the final documents.

Response to Comment S-2-19

This comment notes that goods movement also appears as a secondary consideration in the goals, policies, and actions provided in Chapter 4 of the proposed 2026 RTP/SCS. The comment provides several examples of relevant goals, policies, and actions and provides suggested refinements. The comment also recommends including a dedicated Goods Movement section for the Fresno region in the document, including a freight vision, needs assessment, priority network and corridors, and performance linkages.

Thank you for the comment. The Fresno COG will strive to include a more robust evaluation of goods movement policies and projects and will conduct a Fresno-centric goods movement analysis in future iterations of the proposed 2026 RTP/SCS. Additional language has been added to the Goods Movement section in Chapter 2 to highlight State freight planning efforts. It should be noted that Chapter 3.0, Errata, of this Final PEIR only presents specific changes to the text of the Draft PEIR. The updated RTP Checklist and Final RTP will be submitted to Caltrans once the Fresno COG Policy Board approves the final documents.

Response to Comment S-2-20

This comment states that truck parking is not specifically addressed for the Fresno region in the proposed 2026 RTP/SCS. Given Fresno County's location along Interstate (I-)5 and State Route (SR-)99 and its role in statewide, national, and international goods movement, the commenter suggests the inclusion of a high-level discussion of truck parking challenges, needs, locations, and access to the truck network in the document, and provides suggested resources.

Thank you for the comment. The 2022 California Statewide Truck Parking Study has been added to the Goods Movement section in Chapter 2 of the RTP/SCS. It should be noted that Chapter 3.0, Errata, of this Final PEIR only presents specific changes to the text of the Draft PEIR. The updated RTP Checklist and Final RTP will be submitted to Caltrans once the Fresno COG Policy Board approves the final documents.

Response to Comment S-2-21

This comment states that the proposed 2026 RTP/SCS does not address the significant operational challenges that cleaner technologies and electrification for freight pose for goods movement. The commenter recommends the inclusion of hydrogen fuel-cell technology for long-haul freight and agricultural trucking and findings from the California Freight Mobility Plan.

Thank you for the comment. The 2023 California Freight Mobility Plan has been added to the Goods Movement section in Chapter 2 of the RTP/SCS. It should be noted that Chapter 3.0, Errata, of this Final PEIR only presents specific changes to the text of the Draft PEIR. The updated RTP Checklist and Final RTP will be submitted to Caltrans once the Fresno COG Policy Board approves the final documents.

Response to Comment S-2-22

This comment provides concluding remarks and requests an updated RTP Checklist and Final RTP when available.

Thank you for the comment. The Fresno COG appreciates Caltrans' support in the development of the proposed 2026 RTP/SCS and its supporting documents. The updated RTP Checklist and Final RTP will be submitted to Caltrans once the Fresno COG Policy Board approves the final documents.



Gavin Newsom
GOVERNOR
Toks Omishakin
SECRETARY OF TRANSPORTATION
Ian Choudri
CHIEF EXECUTIVE OFFICER



August 14, 2026

Paul Herman, Deputy Director
Fresno Council of Governments
2035 Tulare Street, Suite 201
Fresno, CA 93721
pherman@fresnocog.org,

Subject: Fresno COG 2026 Draft Regional Transportation Plan and Sustainable Communities Strategy

Dear Paul,

Thank you for the opportunity to comment on the Draft Regional Transportation Plan (RTP) and Sustainable Community Strategy (SCS) documents. The California High Speed Rail Authority's program represents a bold vision to transform the state's future by delivering fast, reliable, zero-emission train service. The benefits of high-speed rail extend beyond mobility; it is a catalyst for economic growth, environmental sustainability, and social equity to meet the needs of a growing population. By linking communities across the state, high-speed rail will expand access to jobs, education, and affordable housing, while reducing greenhouse gas emissions and providing an alternative to congested highways and airports. This vision is consistent with the Fresno COG's 2026 Draft Regional Transportation Plan and Sustainable Communities Strategy.

The Authority provides the following comments with regard to the Draft 2026 RTP/SCS documents:

1. Appendix C. Transportation and Land Use, Item 2. Valleywide Chapter discusses a future High-Speed Rail (HSR) station in downtown Merced as part of the Initial Operating Section. The Authority notes the 2026 Business Plan and Capital Cost Basis of Estimate Report, the Business Plan's Technical Supporting Document, identifies the proposed station will be located near E. Mission Ave, south of downtown Merced along the planned HSR alignment. The Authority continues to engage with Merced County, the City of Merced, and other regional stakeholders regarding potential interim service concepts and station options that could support early passenger operations while maintaining flexibility for future system development and integration with long-term regional transportation objectives. These discussions remain ongoing and the Authority has not made any final decisions regarding station location, station concepts, or future phasing strategies. Accordingly, the RTP/SCS could reflect that station planning and related operational considerations remain under evaluation.

2. Chapter 4, Goal 4, Action 25: The Authority requests clarification regarding its identification as an implementing party for this action. The examples provided (New Vision Aviation program and Sustainable Aviation Project) appear to be aviation-focused initiatives that are not within the Authority's statutory responsibilities or program scope. If the intent is to recognize workforce development efforts related to HSR planning, construction, operations, and maintenance, the action should be revised to reflect that connection. Otherwise, the RTP/SCS should consider removing the California High-Speed Rail Authority as an implementing party for this action.

S-3-1

S-3-2

August 14, 2026

3. We recommend that Fresno COG staff review and reference the Authority's 2026 Business Plan documents describing the current status of work and future outlook on the HSR project in the RTP/SCS documents. This will demonstrate coordination, consistency, and alignment between these critical state and regional endeavors.

<https://hsr.ca.gov/communications-outreach/reports/business-plans/2026-business-plan/>

S-3-3

The Authority looks forward to continued collaboration on issues of shared interest, including station area planning that will leverage the state's and Fresno County's investments in multi-modal transit infrastructure.

Please reach out if you have any questions.

Sincerely,



Ben Lichty, AICP
Principal Transportation Planner
Planning & Sustainability
Ben.Lichty@hsr.ca.gov

2.1.2 California High-Speed Rail Authority (CHSRA)

Comment Code: S-3

Date: August 14, 2026

Because this comment does not raise concerns regarding the adequacy of the information or analysis provided in the Draft PEIR, the Fresno COG is not required under CEQA to address these comments in the Final PEIR. However, in order to provide a consistent, accessible, and transparent location for all comment responses, the Fresno COG has elected to address comments related to the 2026 Draft RTP/SCS, Draft 2027 FTIP, and Draft Conformity Analysis for the 2027 FTIP and the 2026 RTP within this Final PEIR. It should be noted that the comments below do not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft PEIR, or that impacts would be substantially more severe than those identified in the Draft PEIR.

Response to Comment S-3-1

This comment provides introductory remarks and highlights recent changes to the high-speed rail (HSR) program, including the potential relocation of the Merced HSR station to south of downtown Merced, while noting that no final decisions have been made regarding station location, station concepts, or future phasing strategies.

Thank you for the comment. The Fresno COG appreciates the CHSRA's support in the development of the proposed 2026 RTP/SCS and its supporting documents.

Response to Comment S-3-2

This comment requests clarification regarding the CHSRA's identification as an implementing party in Chapter 4, Goal 4, Action 25, which appears to be an aviation-focused initiative that is not within the CHSRA's statutory responsibilities or program scope.

Thank you for the comment. Edits to the document have been made to reflect the requested changes for clarity. The CHSRA has been removed as an Implementing Party from Goal 4, Action 25 and added to Goal 4, Action 24. It should be noted that Chapter 3.0, Errata, of this Final PEIR only presents specific changes to the text of the Draft PEIR. The updated RTP Checklist and Final RTP will be submitted to the CHSRA once the Fresno COG Policy Board approves the final documents.

Response to Comment S-3-3

This comment recommends that the Fresno COG staff review and reference the CHSRA's 2026 Business Plan documents describing the current status of work and outlook on the HSR project in the RTP/SCS documents.

Thank you for the comment. The Fresno COG will continue its collaboration with the CHSRA in the development and eventual operation of HSR in Fresno County, in the San Joaquin Valley, and throughout California.

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August 17, 2026

File No.: 401.13666.18484/AA/26-024

Fresno Council of Governments
2035 Tulare Street
Fresno, CA 93721

RE: SCH# 2025050609

Dear Mr. Herman:

The California Highway Patrol (CHP) Central Division recently reviewed the Draft Environmental Impact Report (EIR) for the Fresno Council of Governments 2026 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), State Clearinghouse (SCH) # 2025050609. Upon review, our office has identified key operational considerations regarding traffic management and public safety.

S-4-1

During the construction phase, several proposed projects will create individual and cumulative impacts on traffic flow across county roads and state highways. Heightened congestion in active work zones increases the risk of traffic incidents and service delays. To effectively mitigate congestion, maintain traffic flow, and respond to critical incidents within these zones, additional traffic management coordination will be required. To minimize risks during construction, CHP strongly requests that project operators and contractors rigorously establish, monitor, and enforce comprehensive work-zone safety plans and temporary traffic control measures. CHP officers will continue active enforcement of California Vehicle Code provisions throughout project corridors to protect both the motoring public and construction personnel.

S-4-2

Upon completion, the proposed roadway enhancements will positively impact overall traffic safety and improve emergency response times throughout the region. Thank you for the opportunity to review and comment on this document. If you have any questions or require further coordination, please contact Lieutenant John Tyler at (559) 603-7740.

S-4-3

Sincerely,

D. D. GILMORE, Chief
Central Division



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2.1.3 California Highway Patrol (CHP)

Comment Code: S-4

Date: August 17, 2026

Response to Comment S-4-1

This commenter provides introductory remarks and states that they have identified key operational considerations for the proposed project regarding traffic management and public safety.

Specific concerns pertaining to potential transportation impacts of the proposed project are raised by the commenter in subsequent comments. Responses to those comments are described and addressed in further detail below. Because this specific comment does not contain any substantive input or questions about the environmental analysis or conclusions contained in the Draft PEIR, no further response is required.

Response to Comment S-4-2

This comment states that, during the construction phase, future development or transportation projects facilitated by the proposed project will create individual and cumulative impacts on traffic flow, including traffic accidents and service delays, due to heightened congestion in active work zones. The comment requests the preparation and implementation of comprehensive work-zone safety plans and temporary traffic control measures, and states that CHP officers will continue to enforce California Vehicle Code provisions throughout project corridors.

The Draft PEIR acknowledges the potential for construction-related transportation delays. As described in Section 4.9, Hazards and Hazardous Materials, of the Draft PEIR (page 4.9-30), construction facilitated by the proposed project could require temporary closure of traffic lanes or roadways adjacent to, or within, a specific project site. Depending upon the timing, location, and duration of construction activities, temporary traffic congestion from lane restrictions, and/or road closures could delay emergency vehicle response times or otherwise disrupt delivery of emergency response services. Detours could increase travel time and associated response times as well. Finally, emergency routes could be impaired.

In order to address potential construction-related impacts, the Draft PEIR included Project-specific Mitigation Measure (PMM) HAZ-4 (refer to Draft PEIR pages 4.9-37 through 4.9-38), which required that individual projects with temporary roadway closures implement a Traffic Control Plan to maintain traffic flow; provide detours for vehicles, pedestrians, and bicycles; schedule truck trips outside peak hours; limit lane closures; and ensure access to sensitive facilities. This plan would also address work zone safety concerns. Future construction activities within public right-of-way would be coordinated with the CHP as appropriate. No further response is required.

Response to Comment S-4-3

This comment states that, upon completion, the roadway enhancement projects included in the proposed project will positively impact overall traffic safety and improve emergency response times throughout the region. The comment also provides concluding remarks.

The Draft PEIR acknowledges the potential benefits of the proposed project with respect to traffic safety and emergency response times. As stated on page 4.17-32 of the Draft PEIR, the Fresno COG included safety as one of the criteria to score and select projects during the project selection process. Local jurisdictions were incentivized to submit projects with features that addressed safety issues. Such projects received extra points during the project scoring process. In addition, as stated on page 4.17-33 of the Draft PEIR, the transportation network improvements and programs facilitated by the proposed project would provide a safe and reliable system of multimodal transportation, which would help facilitate emergency access and the movement of people during emergencies.

This comment, which does not raise concerns regarding the adequacy of the information or analysis provided in the Draft PEIR, is noted. No further response is required.

STATE OF CALIFORNIA
DEPARTMENT OF FISH AND WILDLIFE



GAVIN NEWSOM, Governor
MEGHAN HERTEL, Director

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

August 17, 2026

Paul Herman, Deputy Director
Fresno Council of Governments
2035 Tulare Street, Suite 201
Fresno, California 93721
(559) 223-4148, Extension 251
pherman@fresnocog.org

**Subject: 2026 Regional Transportation Plan/Sustainable Communities
Strategy (Plan)
Draft Program Environmental Impact Report (DPEIR)
State Clearinghouse No.: 2025050609**

Dear Paul Herman:

The California Department of Fish and Wildlife (CDFW) received a DPEIR from the Fresno Council of Governments (FCOG) for the above-referenced Plan pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹

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

CDFW ROLE

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the State (Fish and Game Code, §§

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

Paul Herman, Deputy Director
 Fresno Council of Governments
 August 17, 2026
 Page 2

711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (*Id.*, § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

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

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

- Take is for necessary scientific research,
- Efforts to recover a fully protected, endangered, or threatened species, live capture, and relocation of a bird species for the protection of livestock, or
- They are a covered species whose conservation and management are provided for in a Natural Community Conservation Plan (Fish & G. Code, §§ 3511, 4700, 5050, & 5515).

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

S-5-1
 cont.

Paul Herman, Deputy Director
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 Page 3

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

S-5-1
cont.

PLAN DESCRIPTION SUMMARY

Proponent: Fresno Council of Governments

Objective: The Plan updates the FCOG Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS), as required by State and federal guidelines. The Plan identifies the region's transportation needs and issues, sets forth an action plan of projects and programs to address the needs consistent with the adopted policies, and documents the financial resources needed to implement the plan. The Plan is also used to guide development of the Regional Transportation Improvement Program (RTIP). The RTIP is the programming document used to plan the construction of regional transportation projects and requires approval from the State Department of Transportation (Caltrans).

Location: The Plan covers the entirety of the corporate limits of Fresno County and includes the fifteen (15) incorporated cities of Clovis, Coalinga, Firebaugh, Fowler, Fresno, Huron, Kerman, Kingsburg, Mendota, Orange Cove, Parlier, Reedley, San Joaquin, Sanger, and Selma and all unincorporated areas under the jurisdiction of the county.

S-5-2

COMMENTS AND RECOMMENDATIONS

CDFW acknowledges that the biological resources assessment included in the DPEIR is a program-level analysis of potential environmental consequences from implementation of the proposed Plan and is not site or project-specific. The DPEIR notes that subsequent project-specific CEQA documents may be required to further analyze the projects tiered from this Plan to determine the magnitude of biological resource impacts and identify appropriate potential mitigation measures.

CDFW offers the following comments and recommendations to assist the FCOG in adequately identifying and/or mitigating the Plan's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. CDFW submitted a comment letter on June 12, 2025, in response to the Plan's Notice of Preparation (NOP).

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Page 4

Western Spadefoot

The DPEIR states that western spadefoot (*Spea hammondi*; WESP) is listed as a State species of special concern and that is either present or potentially present within the Plan area. The California Fish and Game Commission (FGC) approved western spadefoot toad (WESP) as a candidate for potential listing as a protected species under CESA on August 13, 2026. FGC is currently working to publish these findings in the California Regulatory Notice Register (Notice Register). Once these findings are published in the Notice Register, WESP will be designated as a candidate under CESA and as such will receive the same legal protection afforded to an endangered or threatened species (Fish & G. Code, §§ 2074.2 & 2085). If WESP is found during biological surveys that are conducted as part of a project that is tiered from this Plan, and avoidance is not feasible, take authorization through the acquisition of an Incidental Take Permit (ITP), pursuant to Fish and Game Code section 2081, subdivision (b), would be necessary to comply with CESA.

S-5-3

Wildlife Corridors and Habitat Connectivity

California wildlife is losing the ability to move and migrate as habitat conversion and built infrastructure disrupts species habitat and cut off migration corridors. Senate Bill (SB) 790 and Assembly Bill 2344 both address wildlife connectivity in California and assert authority and responsibility to CDFW and/or local and state transportation agencies to implement wildlife connectivity actions by identifying where they are needed, coordinate and implement those actions, and establish compensatory mitigation credits for actions taken.

The DPEIR includes mitigation measure PMM BIO-4 to reduce substantial adverse effects to wildlife movement and connectivity. Mitigation measure PMM BIO-4 requires projects to incorporate site-specific wildlife connectivity studies and analyses when appropriate, include infrastructure and project design that facilitates wildlife movement, and implement conservation measures, such as the installation of wildlife direction fencing, to facilitate movement and mitigate for potential significant impacts. Mitigation measure PMM BIO-4 also requires direct coordination with CDFW during development and implementation of these measures. CDFW concurs with these measures and recommends project proponents consult with CDFW early during the project-development process to assist with the development of wildlife connectivity study and/or project design.

S-5-4

Nesting Birds

CDFW recommends that all projects tiered from the Plan occur during the bird non-nesting season; however, if ground-disturbing or vegetation-disturbing activities must

S-5-5

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occur during the nesting season (February 1st through September 15th), the project applicant is responsible for ensuring that implementation of the project does not result in violation of the Migratory Bird Treaty Act or relevant Fish and Game Code sections as referenced above.

To evaluate future project-related impacts on nesting birds, CDFW further recommends that a qualified biologist conduct a pre-construction survey for active nests no more than ten (10) days prior to the start of ground or vegetation disturbance to maximize the probability that nests that could potentially be impacted are detected. CDFW also recommends that surveys cover a sufficient area around the project site to identify nests and determine their status. A sufficient area means any area potentially affected, either directly or indirectly, by the project. In addition to direct impacts (i.e., nest destruction), noise, vibration, and movement of workers or equipment could also affect nests. CDFW recommends that a qualified biologist establish a behavioral baseline of all identified nests. Once project activities begin, CDFW recommends having a qualified biologist continuously monitor nests to detect behavioral changes resulting from the project. If behavioral changes occur, CDFW recommends halting the work causing that change and consulting with CDFW for additional avoidance and minimization measures.

S-5-5
 cont.

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

Significant and Unavoidable Impacts

The DPEIR notes that implementation of the Plan would facilitate various future transportation improvement and land use development projects that could result in substantial adverse impacts to sensitive species. Section 4.4.6 discusses the project impacts and acknowledges that implementation of the Plan would result in significant and unavoidable impacts to special-status species. The DPEIR acknowledges that, due to the programmatic nature of the Plan and the scale of the FCOG region, a conclusion that all potential impacts would be mitigated to less than significant, cannot be definitely reached. Further, the Plan states that the analysis presented is a general characterization of reasonably foreseeable impacts that could

S-5-6

Paul Herman, Deputy Director
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Page 6

occur with implementation of the Plan. Therefore, it is assumed that future projects tiered from the DPEIR could have the potential for significant and unavoidable impacts to biological resources, and the DPEIR recommends that individual project CEQA documents incorporate a project-level analysis to determine appropriate mitigation strategies. CDFW further recommends that future projects tiered from the DPEIR clearly state their biological resource impacts and provide a robust biological resource and cumulative impact analysis to support the conclusions drawn in the project's CEQA document.

S-5-6
cont.

Cumulative Impacts

Currently, the DPEIR has a very broad analysis of cumulative impacts to biological resources and does not adequately evaluate impacts to specific resources. The cumulative impact analysis acknowledges that impacts such as habitat loss, degradation, or fragmentation of riparian habitat and other sensitive natural communities could occur; and that construction and operation of foreseeable projects may result in increased noise, lightning, human disturbance, and the introduction of physical barriers. The analysis notes that mitigation measures PMM BIO-1 to PMM BIO-5 would reduce these impacts through measures, including, but not limited to, pre-construction surveys; biological monitoring during construction; worker environmental awareness training; delineation of aquatic features; coordination with appropriate resource agencies; adherence to applicable regulations; avoidance and minimization protocols; and species-specific mitigation planning. However, even with the implementation of PMM BIO-1 to PMM BIO-5 the DPEIR concludes that impacts from implementation of the Plan are cumulatively considerable.

S-5-7

CDFW has concerns that the broad analysis does not adequately evaluate impacts to specific biological resources. As such, the conclusions reached in the cumulative impacts analysis are not supported by substantial evidence, and the analysis lacks sufficient rigor and transparency to adequately develop reasonable and feasible measures to reduce harm to specific biological resources. This is especially concerning given the DPEIR's finding that cumulative impacts on biological resources would be cumulatively considerable. To address this, CDFW recommends that the DPEIR conduct a cumulative impact analysis for all specific biological resources that would either be significantly or potentially significantly impacted by implementation of the Plan, including those whose impacts are determined to be less than significant with mitigation incorporated or for those resources that are rare or in poor or declining health and would be impacted by future projects tiered from the Plan, even if those impacts are relatively small (i.e., less than significant). CDFW recommends cumulative impacts be analyzed using an acceptable methodology to

Paul Herman, Deputy Director
 Fresno Council of Governments
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 Page 7

evaluate the impacts of past, present, and reasonably foreseeable future projects on resources and be focused specifically on the resource, not the projects. An appropriate resource study area should be identified and mapped for each resource being analyzed and utilized for this analysis. CDFW staff are available for consultation in support of cumulative impacts analyses as a trustee and responsible agency under CEQA.

S-5-7
 cont.

California Natural Diversity Database (CNDDDB)

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

S-5-8

ENVIRONMENTAL DATA

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

S-5-9

FILING FEES

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

S-5-10

Paul Herman, Deputy Director
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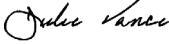
CONCLUSION

CDFW appreciates the opportunity to comment and assist the FCOG in identifying and mitigating Plan impacts on biological resources. More information on survey and monitoring protocols for sensitive species can be found at CDFW's website (<https://www.wildlife.ca.gov/Conservation/Survey-Protocols>).

S-5-10
cont.

If you have any questions regarding this letter or further coordination, please contact Marile Colindres, Environmental Scientist, by telephone at (559) 974-3452, or by electronic mail at marile.colindres@wildlife.ca.gov.

Sincerely,

DocuSigned by:

FA83F09FE08945A...

Julie A. Vance
Regional Manager

ec: State Clearinghouse
Governor's Office of Land Use and Climate Innovation
state.clearinghouse@lci.ca.gov

2.1.4 California Department of Fish and Wildlife (CDFW)

Comment Code: S-5

Date: August 17, 2026

Response to Comment S-5-1

This comment provides introductory remarks, explains the role of CDFW as a Trustee Agency and Responsible Agency for the proposed project, and describes species that CDFW has jurisdiction over.

This comment, which does not raise concerns regarding the adequacy of the information or analysis provided in the Draft PEIR, is noted. No further response is required.

Response to Comment S-5-2

This comment summarizes the proposed project, acknowledges the programmatic nature of the Draft PEIR, and introduces comments that follow.

Specific concerns pertaining to biological resources were raised by the commenter in subsequent comments. Responses to those comments are described and addressed in further detail below. Because this specific comment does not contain any substantive input or questions about the environmental analysis or conclusions contained in the Draft PEIR, no further response is required.

Response to Comment S-5-3

This comment states that the western spadefoot, which is listed as a State Species of Special Concern in the Draft PEIR, will soon be designated as a candidate under the California Endangered Species Act (CESA) and describes the process of complying with legal protections that will be afforded to this species when projects tier from the Draft PEIR.

This comment, which does not raise concerns regarding the adequacy of the information or analysis provided in the Draft PEIR, is noted. Given that the listing of the western spadefoot as a candidate under CESA has yet to be published in the Notice Register, revision to the Draft PEIR is not required at this time. However, future development or transportation projects facilitated by the proposed project would comply with all provisions of CESA, including avoidance and/or obtaining an Incidental Take Permit if western spadefoot (or another protected species) is encountered during site-specific surveys conducted prior to construction. No further response is required.

Response to Comment S-5-4

This comment expresses concurrence with PMM BIO-4 and recommends that proponents of future development or transportation projects facilitated by the proposed project consult with CDFW early during the project-development process to assist with the development of wildlife connectivity study and/or project design.

This comment, which does not raise concerns regarding the adequacy of the information or analysis provided in the Draft PEIR, is noted. As described in PMM BIO-4 (refer to Draft PEIR page 4.4-46), coordination with local agencies and the regulatory agency (i.e., the United States Fish and Wildlife

Service [USFWS] or CDFW) would occur during the impact analysis process related to wildlife movement corridors and/or wildlife nursery sites.

Pursuant to Section 15082 of the *State CEQA Guidelines*, in the event that an environmental impact report (EIR) is required for a future development or transportation projects facilitated by the proposed project, the implementing agency would be required to provide the responsible and trustee agencies, the Governor's Office of Land Use and Climate Innovation, and county clerk sufficient information describing the project and the potential environmental effects to enable the responsible agencies to make a meaningful response within a 30-day scoping period. During this time, CDFW will have the opportunity to provide specific detail about the scope and content of the environmental information related to the responsible or trustee agency's area of statutory responsibility that must be included in each draft EIR. No further response is required.

Response to Comment S-5-5

This comment recommends that all future development or transportation projects facilitated by the proposed project occur during the bird non-nesting season. However, if ground-disturbing or vegetation-disturbing activities must occur during the nesting season (February 1 through September 15), the comment notes that each proponent is responsible for ensuring that implementation of the project does not result in violation of the Migratory Bird Treaty Act (MBTA) or relevant Fish and Game Code. Finally, the comment recommends additional measures to avoid impacts to nesting birds. This includes preconstruction surveys and establishment of buffers around active nests.

As described in PMM BIO-1 (refer to Draft PEIR page 4.4-42), one potential mitigation measure that is required to be considered by implementing agencies for future development or transportation projects is the scheduling of construction activities to avoid sensitive time periods for biological resources (e.g., the nesting bird season). In addition, as described in PMM BIO-4 (refer to Draft PEIR page 4.4-46), another potential mitigation measure that is required to be considered by implementing agencies for future development or transportation projects is requiring a qualified biologist to conduct surveys to identify active migratory/native bird nests no more than 7 days before the start of construction at project sites from February 1 through August 31, which covers almost all of the nesting bird season identified in the comment. Another potential mitigation measure included in PMM BIO-4 is the prohibition of construction activities within 250 feet of active raptor nests and 50 feet of active non-raptor nests. Therefore, the Draft PEIR sufficiently acknowledges protections for nesting birds encountered during construction associated with future development or transportation projects facilitated by the proposed project. Further, all such future projects would be required by law to adhere to the MBTA and California Fish and Game Code Sections 3500–3516. No further response is required.

Response to Comment S-5-6

This comment states that, based on significant and unavoidable biological resource impacts identified in the Draft PEIR, future projects tiered from the Draft PEIR could potentially have significant and unavoidable impacts to biological resources. The commenter recommends that individual CEQA documents incorporate project-level analyses to determine appropriate mitigation strategies. This should clearly state biological resource impacts and provide a robust biological resource and cumulative impact analysis.

The Draft PEIR (refer to Draft PEIR page 4.4-1) acknowledges that subsequent project-specific CEQA documents may be required to further analyze future specific projects facilitated by the proposed project to determine the magnitude of biological resource impacts and to identify appropriate potential mitigation measures. Under CEQA, an agency may not approve a project with significant environmental impacts if there are feasible mitigation measures that would substantially lessen impacts that are deemed significant. Thus, if an impact of a future project is considered “significant” under CEQA, the implementing agency must mitigate the impact to the extent necessary to render the impact less than significant, unless the agency finds that doing so is not feasible.

Pursuant to Public Resources Code (PRC) Section 21081(b), and *State CEQA Guidelines* Section 15093(a) and (b), the decision-making agency is required to balance, as applicable, the economic, legal, social, technological, or other benefits of the project against its unavoidable environmental risks when determining whether to approve a project. If the specific economic, legal, social, technological, or other benefits of the project outweigh the unavoidable adverse environmental effects, those effects may be considered “acceptable” (14 CCR § 15093 (a)). CEQA requires the agency to support, in writing, the specific reasons for considering a project acceptable when significant impacts are not avoided or substantially lessened. Those reasons must be based on substantial evidence in the Final EIR or elsewhere in the administrative record (14 CCR § 15093(b)). Courts have upheld overriding considerations that were based on a variety of policy considerations including, but not limited to, new jobs, stronger tax base, and implementation of an agency’s economic development goals, growth management policies, redevelopment plans, the need for housing and employment, conformity to community plan, and provision of construction jobs; see *Towards Responsibility in Planning* v. City Council (1988) 200 Cal App. 3d 671; *Dusek v. Redevelopment Agency* (1985) 173 Cal App. 3d 1029; *City of Poway v City of San Diego* (1984) 155 Cal App. 3d 1037; and *Markley v. City Council* (1982) 131 Cal App.3d 656.

Therefore, it is possible that future development or transportation projects facilitated by the proposed project may result in significant and unavoidable impacts to biological resources, as with the proposed project (refer to Draft PEIR page 4.4-50). In such a case, the implementing agency would be required to prepare a robust explanation of such impacts and the justification/overriding considerations for approving the project despite such impacts.

In summary, each individual project-specific document would be required to comply with the requirements of CEQA pertaining to the disclosure and mitigation of identified project-specific and cumulative impacts (*State CEQA Guidelines* Section 15126.4). This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft PEIR, or that impacts would be substantially more severe than those identified in the Draft PEIR. No revisions are necessary, and no further response is required.

Response to Comment S-5-7

This comment claims the analysis of cumulative impacts provided in the Draft PEIR is too broad to adequately evaluate impacts to specific biological resources, is not supported by substantial evidence, and lacks rigor and transparency. The comment recommends that the Draft PEIR be revised to include a cumulative impact analysis for all potentially affected specific biological resources using an

acceptable methodology, including the mapping of an appropriate resource study area for each resource.

As described throughout the Draft PEIR (refer to Draft PEIR pages 4.1-25, 4.2-32, 4.3-45, 4.4-52, 4.5-22, 4.6-17, 4.7-28, 4.8-28, 4.9-39, 4.10-45, 4.11-19, 4.12-21, 4.13-25, 4.14-25, 4.15-32, 4.16-10, 4.17-37, 4.18-11, 4.19-25, and 4.20-25), given the programmatic nature of the proposed project and the scale of the Fresno COG Region, it cannot be definitively known whether potential impacts, including cumulative impacts, would be mitigated to below levels of significance. The Draft PEIR acknowledges that the responsibility to approve future projects, evaluate the applicability and feasibility of project-specific mitigation prescribed in the PEIR, and ensure implementation of mitigation deemed applicable and feasible ultimately belongs to Caltrans, local jurisdictions, and other responsible agencies. Therefore, potential impacts associated with biological resources—including cumulative impacts—have been conservatively identified as significant and unavoidable, the most severe impact conclusion under CEQA (refer to Table 1.A: Summary of Project Impacts, Mitigation Measures, and Level of Significance After Mitigation; Draft PEIR pages 1-11 through 1-35). Given that this is the most severe impact conclusion under CEQA, even if revisions to the cumulative analysis presented in the Draft PEIR would occur, these revisions would not yield a more conservative result.

Pursuant to *State CEQA Guidelines* Section 15130(b)(1)(a), either a list of past, present, and probable future projects or a summary of projections contained in an adopted planning document can be used in the evaluation of potential cumulative impacts. Under the list approach, all proposed, recently approved, under construction, and reasonably foreseeable projects that could produce a related or cumulative impact on the local environment when considered in conjunction with a proposed project are evaluated in an EIR. As described on page 4.4-51 of the Draft PEIR, the cumulative impact analysis for biological resources considers the larger context of future land use development and transportation projects as envisioned by the proposed project and relies upon Fresno COG projections. Therefore, the Draft PEIR complies with CEQA in its analysis of cumulative impacts.

Biological resources are dispersed throughout the Fresno COG Region in a manner that is impossible to comprehensively characterize in the Draft PEIR. The specific nature and extent of future development or transportation projects facilitated by the proposed project are also unknown at this time. Accordingly, it is not reasonably feasible to evaluate impacts to specific biological resources at this time, and the analysis presented in the Draft PEIR is general in nature (refer to Draft PEIR page 4.4-1). Section 15151 of the *State CEQA Guidelines* states the following:

“An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure.”

The degree of analysis of cumulative impacts presented in the Draft PEIR is sufficient given the degree of detail available related to the potential biological resource impacts of the proposed project. The

Draft PEIR repeatedly acknowledges the limited detail available regarding potential impacts resulting from implementation of future projects facilitated by the proposed project while acknowledging the preparation of future project-specific CEQA analyses when necessary (refer to Draft PEIR Section 2.2.3, page 2-7).

Further, according to a CEQA Topic Paper published by the Association of Environmental Professionals (AEP), cumulative impact analyses may provide a general discussion that addresses all of the potential cumulative impacts for a particular issue area.¹ Consistent with this approach, each section of Chapter 4.0, including Section 4.4, Biological Resources, included a subsection discussing cumulative impacts (refer to Draft PEIR page 4.4-51). As acknowledged in this comment, mitigation measures identified as part of the individual project evaluation were applied to the cumulative analysis as they can reduce the project's cumulative contribution.

In addition, pursuant to Section 15130 of the *State CEQA Guidelines*, in the event that an EIR is required for a future development facilitated by the proposed project, the implementing agency would be required to include a discussion of cumulative impacts. These project-specific impact analyses would outline appropriate resource study areas based on characteristics of each project site and its vicinity. In addition, these analyses would be tailored to focus on the biological resource conditions unique to each project site.

This comment does not provide evidence that the environmental analysis in the Draft PEIR is inadequate, that there would be any new significant impacts not addressed in the Draft PEIR, or that impacts would be substantially more severe than those identified in the Draft PEIR. No revisions are necessary, and no further response is required.

Response to Comment S-5-8

This comment states that the California Natural Diversity Database (CNDDDB) is not exhaustive, and a lack of an occurrence record in the CNDDDB does not mean a species is not present. The commenter recommends that surveys be conducted by a qualified wildlife biologist/botanist during the appropriate survey period(s) and using the appropriate protocol survey methodology in order to determine whether any special-status species are present at or near each future project site.

Given the scale of the Fresno COG Region and the number of projects included in the Constrained Program of Projects, biological resource surveys were infeasible in support of the Draft PEIR. As described in Response to Comment S-5-6, above, the Draft PEIR (refer to Draft PEIR page 4.4-1) acknowledges that subsequent project-specific CEQA documents may be required to further analyze future specific projects facilitated by the proposed project to determine the magnitude of biological resource impacts and to identify appropriate potential mitigation measures. Surveys would be conducted, as appropriate, at each individual project site in a manner consistent with required survey protocols.

¹ Association of Environmental Professionals (AEP). 2020. *CEQA Portal Topic Paper: Cumulative Impacts*. December 18.

This comment does not provide evidence that the environmental analysis in the Draft PEIR is inadequate, that there would be any new significant impacts not addressed in the Draft PEIR, or that impacts would be substantially more severe than those identified in the Draft PEIR. No revisions are necessary, and no further response is required.

Response to Comment S-5-9

This comment requests that any special-status species and natural communities detected during surveys associated with future transportation improvements and development projects facilitated by the proposed project are uploaded to the CNDDB, as required under CEQA.

This comment, which does not raise concerns regarding the adequacy of the information or analysis provided in the Draft PEIR, is noted. As applicable, the proposed project and future projects would comply with the requirements of CEQA, including the uploading of information to relevant databases. No further response is required.

Response to Comment S-5-10

This comment states that the proposed project or future development or transportation projects facilitated by the proposed project may be subject to CDFW filing fees at the time the Notice of Determination (NOD) is filed and provides concluding remarks.

This comment, which does not raise concerns regarding the adequacy of the information or analysis provided in the Draft PEIR, is noted. As applicable, the proposed project and future projects would pay all required filing and publishing fees, including CDFW fees. No further response is required.

2.2 REGIONAL AGENCIES

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August 17, 2026

Paul Herman
Fresno Council of Governments
2035 Tulare Street, Suite 201
Fresno, CA 93721

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

District CEQA Reference No: 20260789

Dear Mr. Herman:

The San Joaquin Valley Air Pollution Control District (District) has reviewed the Draft Program Environmental Impact Report (DPEIR) from the Fresno Council of Governments (FCOG) for the 2026 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Per the DPEIR, the project consists of updating FCOG's transportation plan for the region's transportation system to ensure the plan adequately addresses future transportation needs (Project). The Project is located within Fresno County including incorporated cities (Clovis, Coalinga, Firebaugh, Fowler, Fresno, Huron, Kerman, Kingsburg, Mendota, Orange Cove, Parlier, Reedley, San Joaquin, Sanger, and Selma), all unincorporated communities under the jurisdiction of the county, all in California.

R-1-1

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

1) Land Use Planning/Project Sitting

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

R-1-2

Samir Sheikh

Executive Director/Air Pollution Control Officer

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have proven to be beneficial for air quality. The District recommends that future development incorporate strategies that reduce VMTs and require the cleanest available heavy-duty trucks, vehicles, and off-road equipment, including zero and near-zero technologies. VMTs can be reduced through encouragement of mix-use development, walkable communities, etc. Additional design element options can be found at: <https://ww2.valleyair.org/media/ob0pweru/clean-air-measures.pdf>

In addition, the District recommends that future development incorporate strategies that will advance implementation of the best practices listed in Tables 5 and 6 of California Air Resource Board's (CARB's) Freight Handbook Concept Paper, to the extent feasible. This document compiles best practices designed to address air pollution impacts as "practices" which may apply to the siting, design, construction, and operation of freight facilities to minimize health impacts on nearby communities. The concept paper is available at:

https://ww2.arb.ca.gov/sites/default/files/2020-03/2019.12.12%20-%20Concept%20Paper%20for%20the%20Freight%20Handbook_1.pdf

R-1-2
cont.

2) Project Related Emissions

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

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

R-1-3

2a) Operational Emissions

Future development projects operational (ongoing) air emissions from mobile sources and stationary sources should be analyzed separately. For reference, the District's significance thresholds are identified in the District's Guidance for Assessing and Mitigating Air Quality Impacts:

<https://ww2.valleyair.org/media/g4nl3p0g/gamaqi.pdf>.

Recommended Mitigation Measure: At a minimum, project related impacts on air quality should be reduced to levels below the District's significance thresholds through incorporation of design elements such as the use of cleaner Heavy Heavy-Duty (HHD) trucks and vehicles, measures that reduce Vehicle Miles Traveled (VMTs), and measures that increase energy efficiency. More information on transportation mitigation measures can be found at: <https://ww2.valleyair.org/media/ob0pweru/clean-air-measures.pdf>

2b) Recommended Model for Quantifying Air Emissions

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

3) Health Risk Screening/Assessment

Mitigation Measure PMM AQ-2 in the DPEIR states that for projects proposed within 500 feet of existing sensitive receptors, the implementing agency shall require the preparation of a Construction Health Risk Assessment prior to project approval. The District would like to clarify that a Health Risk Assessment (HRA) should evaluate all potential air toxic emissions from the Project, which would include mobile and stationary sources of emissions from both project construction and operation. Therefore, the District recommends Mitigation Measure PMM AQ-2 be updated to include a HRA for operational emissions.

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

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

R-1-3
cont.

R-1-4

Prioritization (Screening Health Risk Assessment):

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

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

Health Risk Assessment:

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

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

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

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

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

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

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

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

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

R-1-4
cont.

4) Ambient Air Quality Analysis

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

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

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

R-1-5

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

5a) Voluntary Emission Reduction Agreement

Future development projects could have a significant impact on air quality. The District recommends the DPEIR include a feasibility discussion on implementing a Voluntary Emission Reduction Agreement (VERA) as a mitigation measure for future development projects that may be approved under implementation of the Project that are determined to exceed the District's CEQA significance thresholds.

A VERA is a mitigation measure by which the project proponent provides pound-for-pound mitigation of emissions increases through a process that develops, funds, and implements emission reduction projects, with the District serving a role of administrator of the emissions reduction projects and verifier of the successful mitigation effort. To implement a VERA, the project proponent and the District enter into a contractual agreement in which the project proponent agrees to mitigate project specific emissions by providing funds for the District's incentives programs. The funds are disbursed by the District in the form of grants for projects that achieve emission reductions. Thus, project-related impacts on air quality can be mitigated. Types of emission reduction projects that have been funded in the past include electrification of stationary internal combustion engines (such as agricultural irrigation pumps), replacing old heavy-duty trucks with new, cleaner, more efficient heavy-duty trucks, and replacement of agricultural equipment with the latest generation technologies.

R-1-6

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

R-1-6
cont.

5b) Locomotives, and Railcar Movers/Switchers

To reduce air quality emission impacts from future development projects, the District recommends future development project proponents advise freight and passenger train operators to utilize newer, and cleaner technology. Replacing older locomotives is important to reduce the public's exposure to diesel emissions, including PM_{2.5} in the form of diesel particulate and NO_x. These pollutants negatively impact human health, especially for sensitive populations such as children and the elderly. New, clean-technology locomotives generate significantly lower emissions than older, uncontrolled diesel locomotives.

R-1-7

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

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

5c) District's Bikeway Incentive Program

Incorporating design elements (e.g., installing bikeways) that enhance walkability and connectivity can result in an overall reduction of vehicles miles traveled (VMT) and improve air quality within the area. Since future development projects approved under implementation of the Project may install bikeways, they may be eligible for funding through the District's Bikeway Incentive Program. The Bikeway Incentive Program provides funding for eligible Class I (Bicycle Path Construction), Class II (Bicycle Lane Striping), or Class III (Bicycle Route) projects. These incentives are designed to support the construction of new bikeway projects to promote clean air through the development of a widespread, interconnected network of bike paths, lanes, or routes and improving the general safety conditions for commuter bicyclists.

R-1-8

Only municipalities, government agencies, or public educational institutions are eligible to apply. More information on the grant program can be found at: <https://ww2.valleyair.org/grants/bike-paths/>

R-1-8
cont.

Guidelines and Project Eligibility for the grant program can be found at: <https://ww2.valleyair.org/media/drpijuw1/bikeway-program-guidelines-62515.pdf>

6) **District Rules and Regulations**

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

The list of rules below is neither exhaustive nor exclusive. Current District rules can be found online at: <https://ww2.valleyair.org/rules-and-planning/current-district-rules-and-regulations>. To identify other District rules or regulations that apply to future projects, or to obtain information about District permit requirements, the project proponents are strongly encouraged to contact the District's Small Business Assistance (SBA) Office at (559) 230-5888.

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

R-1-9

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

Future development projects may be subject to District Rule 2010 (Permits Required) and Rule 2201 (New and Modified Stationary Source Review) and may require District permits. Prior to construction, project proponents shall obtain an ATC permit from the District for equipment/activities subject to District permitting requirements. For further information or assistance, project proponents may contact the District's SBA Office at (559) 230-5888.

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

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

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

Table 1: ISR Applicability Thresholds

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

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

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

Information about how to comply with District Rule 9510 can be found online at: <https://ww2.valleyair.org/permitting/indirect-source-review-rule-overview>

R-1-9
cont.

The AIA application form can be found online at:
<https://ww2.valleyair.org/permitting/indirect-source-review-rule-overview/forms-and-applications/>

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

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

Future development projects may be subject to District Rule 9410 (Employer Based Trip Reduction) if the project would result in employment of 100 or more “eligible” employees. District Rule 9410 requires employers with 100 or more “eligible” employees at a worksite to establish an Employer Trip Reduction Implementation Plan (eTRIP) that encourages employees to reduce single-occupancy vehicle trips, thus reducing pollutant emissions associated with work commutes. Under an eTRIP plan, employers have the flexibility to select the options that work best for their worksites and their employees.

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

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

6d) Other District Rules and Regulations

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

7) District Comment Letter

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

R-1-9
cont.

R-1-10

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

R-1-10
cont.

Sincerely,

Mark Montelongo
Director of Policy and Government Affairs

A handwritten signature in black ink, appearing to read 'DM', is positioned above the name Daniel Martinez.

Daniel Martinez
Program Manager

2.2.1 San Joaquin Valley Air Pollution Control District (SJVAPCD)

Comment Code: R-1

Date: August 17, 2026

Response to Comment R-1-1

This comment provides introductory remarks and a summary of the proposed project.

This comment, which does not raise concerns regarding the adequacy of the information or analysis provided in the Draft PEIR, is noted. No further response is required.

Response to Comment R-1-2

This comment states that land use decisions are critical to improving air quality within the San Joaquin Valley Air Basin and recommends that future development or transportation projects facilitated by the proposed project incorporate strategies that reduce vehicle miles traveled (VMT), require the cleanest available equipment, and incorporate strategies that will advance implementation of the best practices listed in California Air Resource Board's (CARB) *Freight Handbook Concept Paper*, to the extent feasible.

The Fresno COG recognizes the nexus between land use decisions and air quality. As described in Chapter 3.0, Project Description, of the Draft PEIR, the Fresno COG selected Scenario C (Enhanced Transit and Smart Growth) as the preferred project scenario (refer to Draft PEIR page 3-50). A focal point of Scenario C is sustainable urban growth focused on existing urban centers and established areas and supporting higher-density growth with mixed-use development (refer to Draft PEIR page 3-49). As shown in Table 5.A (Refer to Draft PEIR page 5-18), of all the SCS scenarios considered by the Fresno COG, Scenario C would have the highest proportion of future development as infill development (approximately 53.2 percent). This strategy would allow for implementation of sustainability efforts that reduce motor vehicle use and associated mobile-source emissions. This would be accomplished with more compact development achieved by increasing development density and by providing a land use pattern and transportation infrastructure more supportive of public transportation, walking, and bicycling. Therefore, on a regional level, growth within the Fresno COG Region under the RTP/SCS is intended to reduce operational mobile-source emissions as compared to regional growth without adoption of the RTP/SCS. As described in Section 4.3, Air Quality, of the Draft PEIR, these efforts align with the attainment strategy for the San Joaquin Valley Air Basin and are generally consistent with the overarching goals of the applicable Air Quality Management Plans (refer to Draft PEIR page 4.3-26).

As described throughout the Draft PEIR, the Fresno COG itself does not have any land use authority (refer to Draft PEIR page 3-48). Throughout the Draft PEIR, the term "implementing agency" is used to refer to the Fresno COG's partnership agencies that have land use authority and/or legal standing to plan, design, implement, build, operate, and maintain transportation infrastructure, including those projects referred to in the RTP/SCS. Nevertheless, the Draft PEIR contains various PMMs, or project-specific measures developed to reduce or avoid environmental impacts associated with implementation of future development or transportation projects facilitated by the proposed project (refer to Chapter 7.0, MMRP, of the Draft PEIR). In addition, the Draft PEIR contains Fresno COG

Mitigation Measures (FMMs), which would require the Fresno COG to provide guidance and recommendations for member agencies and implementing agencies to consider during planning, review, and implementation of future projects (refer to Chapter 7.0, MMRP, of the Draft PEIR).

Many of the PMMs and FMMs included in the Draft PEIR are intended to reduce VMT, require the cleanest available equipment, and incorporate strategies that will advance implementation of best practices related to air quality. VMT reduction is specifically addressed in FMM TRAN-1 (refer to Draft PEIR page 4.17-34), which encourages the implementation of various transportation measures, including transit-oriented development, active transportation projects, and a regional VMT mitigation program. VMT reduction is also addressed in PMM GHG-1 (refer to Draft PEIR page 4.8-25), which would encourage projects to achieve a reduction in project-generated VMT below the regional average consistent with the newest version of the Scoping Plan. Clean equipment is addressed in FMM EN-1 (refer to Draft PEIR page 4.6-14), under which the Fresno COG shall encourage member agencies to increase the number of alternative fuel vehicles in their fleets, and PMM EN-1 (refer to Draft PEIR page 4.6-15), under which implementing agencies shall consider measures such as developing infrastructure for alternative-fueled vehicles, requiring electric truck refrigerator units, and requiring zero-emission forklifts during construction.

Lastly, air quality best practices are addressed in PMM AQ-1 (refer to Draft PEIR Page 4.3-42), under which implementing agencies shall consider measures such as minimal use of diesel generators during construction and elimination of natural gas use during operation. Therefore, the Fresno COG has included a sufficient degree of detail in the Draft PEIR to reflect the strategies discussed in this comment. This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft PEIR, or that impacts would be substantially more severe than those identified in the Draft PEIR. No revisions are necessary, and no further response is required.

Response to Comment R-1-3

This comment recommends that the Draft PEIR stipulate that future development or transportation projects facilitated by the proposed project identify construction and operational air emissions, compare them to SJVAPCD thresholds, and mitigate them to the extent feasible. The comment also recommends methods for discussing consistency with applicable air quality policies and analyzing emissions of future development or transportation projects facilitated by the proposed project, including separate analyses for mobile and stationary sources, as well as using the California Emissions Estimator Model (CalEEMod).

As described above, the Fresno COG itself does not have any land use authority. However, the Draft PEIR contains various PMMs intended to reduce or avoid environmental impacts associated with implementation of future development or transportation projects facilitated by the proposed project.

Under PMM AQ-1 (refer to Draft PEIR page 4.3-42), implementing agencies shall conduct a project-level air quality analysis consistent with the requirements of CEQA and applicable guidance from the SJVAPCD. According to PMM AQ-1, the analysis shall quantify construction and operational emissions of criteria air pollutants and precursors and evaluate those emissions against the applicable thresholds of significance adopted by the SJVAPCD.

If the analysis demonstrates that project emissions would exceed one or more applicable thresholds of significance, the implementing agency shall require that all feasible mitigation measures to reduce emissions to the maximum extent practicable be identified and implemented.

If an impact is considered “significant” under CEQA, the agency must mitigate the impact to the extent necessary to render the impact less than significant, unless the agency finds that doing so is not feasible. A mitigation measure is only considered feasible when it is capable of being accomplished in a successful manner within the constraints of the project, taking into consideration economic, environmental, legal, social, and technological factors (*State CEQA Guidelines* Section 15021).

By prescribing PMM AQ-1, the Draft PEIR satisfies the requirements of CEQA to mitigate or avoid significant effects on the environment to the extent feasible whilst remaining within the limits of the Fresno COG’s authority. The responsibility to approve projects, evaluate the applicability and feasibility of PMM AQ-1, and ensure implementation of mitigation deemed applicable and feasible ultimately belongs to the implementing agencies (refer to Draft PEIR page 4.3-31).

Further, as described throughout the Draft PEIR, projects subject to discretionary approval by the appropriate implementing agency would be required to comply with the requirements of CEQA (refer to Draft PEIR pages 4.3-25, 4.3-26, 4.3-33, 4.3-34, 4.3-41, and 4.3-45). This would include an environmental review to determine if a project would conflict with or obstruct implementation of the applicable air quality plan based on project-specific details, the identification project-specific mitigation measures, and compliance with applicable regulatory requirements.

Pursuant to Section 15082 of the *State CEQA Guidelines*, in the event that an EIR is required for a future development facilitated by the proposed project, the implementing agency would be required to provide the responsible and trustee agencies, the Governor’s Office of Land Use and Climate Innovation, and the county clerk with sufficient information describing the project and the potential environmental effects to enable the responsible agencies to make a meaningful response within a 30-day scoping period. During this time, the SJVAPCD will have the opportunity to provide specific detail about the scope and content of the environmental information related to the responsible or trustee agency’s area of statutory responsibility that must be included in each draft EIR.

In addition, pursuant to Section 15203 of the *State CEQA Guidelines*, implementing agencies would be required to provide adequate time for other public agencies and members of the public to review and comment on a draft EIR or Negative Declaration for a future development facilitated by the proposed project. During this time, the SJVAPCD will have the opportunity to provide targeted comments on specific developments and associated emissions.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft PEIR, or that impacts would be substantially more severe than those identified in the Draft PEIR. No revisions are necessary, and no further response is required.

Response to Comment R-1-4

This comment states that PMM AQ-2 should be revised to include a Health Risk Assessment (HRA) for operational emissions. The comment also provides methodology recommendations for preparation of the HRA, including prioritization, health risk modeling protocol, and mitigation.

As described in Response to Comment R-1-3, pursuant to Section 15082 of the *State CEQA Guidelines*, in the event that an EIR is required for a future development facilitated by the proposed project, the implementing agency would be required to coordinate with responsible and trustee agencies, which may include the SJVAPCD, during the 30-day scoping period. During this time, the SJVAPCD will have the opportunity to provide specific detail about the scope and content of the environmental information, which may include detail related to the preparation of an operational HRA. Under PMM AQ-1 (refer to Draft PEIR page 4.3-42), implementing agencies shall conduct a project-level air quality analysis consistent with the requirements of CEQA and applicable guidance from the SJVAPCD, which may, as stated above, include guidance to prepare an operational HRA. As such, the need for preparation of an HRA would be determined on a project-by-project basis at the time such projects are proposed.

As previously stated, the responsibility to approve projects, evaluate the applicability and feasibility of PMM AQ-1, and ensure implementation of mitigation deemed applicable and feasible ultimately belongs to the implementing agencies. As described throughout the Draft PEIR, the Fresno COG itself does not have any land use authority and therefore defers the identification and implementation of mitigation measures to implementing agencies.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft PEIR, or that impacts would be substantially more severe than those identified in the Draft PEIR. No revisions are necessary, and no further response is required.

Response to Comment R-1-5

This comment recommends that an Ambient Air Quality Analysis (AAQA) is prepared for future development or transportation projects facilitated by the proposed project that may be approved under implementation of the project with emissions that exceed 100 pounds per day of any pollutant.

As described in Response to Comment R-1-3, pursuant to Section 15082 of the *State CEQA Guidelines*, in the event that an EIR is required for a future development facilitated by the proposed project, the implementing agency would be required to coordinate with responsible and trustee agencies, which may include the SJVAPCD, during the 30-day scoping period. During this time, the SJVAPCD will have the opportunity to provide specific detail about the scope and content of the environmental information, which may include detail related to the preparation of an AAQA. Under PMM AQ-1 (refer to Draft PEIR page 4.3-42), implementing agencies shall conduct a project-level air quality analysis consistent with the requirements of CEQA and applicable guidance from the SJVAPCD, which may, as stated above, include guidance to prepare an AAQA. As such, the need for preparation of an AAQA would be determined on a project-by-project basis at the time such projects are proposed.

As previously stated, the responsibility to approve projects, evaluate the applicability and feasibility of PMM AQ-1, and ensure implementation of mitigation deemed applicable and feasible ultimately belongs to the implementing agencies. As described throughout the Draft PEIR, the Fresno COG itself does not have any land use authority and therefore defers the identification and implementation of mitigation measures to implementing agencies.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft PEIR, or that impacts would be substantially more severe than those identified in the Draft PEIR. No revisions are necessary, and no further response is required.

Response to Comment R-1-6

This comment recommends that the Draft PEIR include a feasibility discussion on implementing a Voluntary Emission Reduction Agreement (VERA) as a mitigation measure for future development or transportation projects facilitated by the proposed project with significant impacts and describes the VERA process.

As described in Response to Comment R-1-3, under PMM AQ-1 (refer to Draft PEIR page 4.3-42), implementing agencies shall conduct a project-level air quality analysis consistent with the requirements of CEQA and applicable guidance from the SJVAPCD. If the analysis demonstrates that project emissions would exceed one or more applicable thresholds of significance, the implementing agency shall require that all feasible mitigation measures to reduce emissions to the maximum extent practicable be identified and implemented. It is at this time that the feasibility of implementing a VERA would be considered. As such, the need for mitigation in the form of a VERA would be determined on a project-by-project basis at the time potential impacts of such projects have been identified during the environmental review process.

As previously stated, the responsibility to approve projects, evaluate the applicability and feasibility of PMM AQ-1, and ensure implementation of mitigation deemed applicable and feasible ultimately belongs to the implementing agencies. As described throughout the Draft PEIR, the Fresno COG itself does not have any land use authority and therefore defers the identification and implementation of mitigation measures to implementing agencies.

Further, pursuant to Section 15203 of the *State CEQA Guidelines*, implementing agencies would be required to provide adequate time for other public agencies and members of the public to review and comment on a draft EIR or Negative Declaration for a future development facilitated by the proposed project. During this time, the SJVAPCD will have the opportunity to provide targeted comments on specific developments and associated emissions.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft PEIR, or that impacts would be substantially more severe than those identified in the Draft PEIR. No revisions are necessary, and no further response is required.

Response to Comment R-1-7

This comment recommends that proponents of future development or transportation projects facilitated by the proposed project advise freight and passenger train operators to utilize newer and cleaner technology. The comment describes the negative impacts of older technologies and the SJVAPCD's incentive program for transitioning to cleaner technology.

As previously stated, the Fresno COG itself does not have any land use authority. However, the Draft PEIR contains various PMMs intended to reduce or avoid environmental impacts associated with implementation of future development or transportation projects facilitated by the proposed project. Under PMM EN-1 (refer to Draft PEIR page 4.6-15), implementing agencies shall consider mitigation measures to reduce impacts to the wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation and provides measures for consideration. This list includes increasing commercial vehicle fleet modernization, incentivizing alternative fuel vehicles and equipment, reducing locomotives' fuel use, and encouraging freight mode shift.

As previously stated, the responsibility to approve projects, evaluate the applicability and feasibility of PMM EN-1, and ensure implementation of mitigation deemed applicable and feasible ultimately belongs to the implementing agencies. Therefore, the Fresno COG has included a sufficient degree of detail in the Draft PEIR to address the recommendations provided in this comment. This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft PEIR, or that impacts would be substantially more severe than those identified in the Draft PEIR. No revisions are necessary, and no further response is required.

Response to Comment R-1-8

This comment notes that since future development or transportation projects facilitated by the proposed project may install bikeways, they may be eligible for funding through the SJVAPCD's Bikeway Incentive Program. The comment also provides a description of the program.

This comment, which does not raise concerns regarding the adequacy of the information or analysis provided in the Draft PEIR, is noted. No further response is required.

Response to Comment R-1-9

This comment describes various SJVAPCD rules that may apply to future development or transportation projects facilitated by the proposed project, including Rule 2010 (Permits Required), Rule 2201 (New and Modified Stationary Source Review), Rule 9510 (Indirect Source Review), Rule 9410 (Employer Based Trip Reduction), Rule 4102 (Nuisance), and Rule 4641 (Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations). The comment also provides resources for determining applicable rules for each development.

This comment, which does not raise concerns regarding the adequacy of the information or analysis provided in the Draft PEIR, is noted. Future development or transportation projects facilitated by the proposed project would be required by law to comply with applicable SJVAPCD rules and regulations. No further response is required.

Response to Comment R-1-10

This comment recommends that a copy of the comment letter is provided to proponents of future development or transportation projects facilitated by the proposed project and provides concluding remarks.

This comment, which does not raise concerns regarding the adequacy of the information or analysis provided in the Draft PEIR, is noted. As previously stated, pursuant to Section 15203 of the *State CEQA Guidelines*, implementing agencies would be required to provide adequate time for other public agencies and members of the public to review and comment on a draft EIR or Negative Declaration for a future development facilitated by the proposed project. During this time, the SJVAPCD will have the opportunity to provide targeted comments on specific developments and associated emissions. No further response is required.

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From: David Sorrell <DSorrell@sjrrc.com>
Sent: Monday, August 17, 2026 4:33 PM
To: Paul Herman <pherman@fresnocog.org>
Subject: San Joaquin Regional Rail Commission - 2027 RTP Comments

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good afternoon Paul,

On behalf of the San Joaquin Regional Rail Commission, I wanted to submit the following comments to the record for the 2027 RTP program, which incorporates the following. Please let us know how we can assist you in achieving many of this projects in the San Joaquin Valley:

1	Appendix C, p.38: The Amtrak Gold Runner route provides service from the San Francisco Bay Area and Sacramento through the SJV to Bakersfield. The Gold Runner runs multiple times daily between the San Francisco Bay Area (or Sacramento) and Bakersfield, where Amtrak Thruway buses connect to Southern California destinations. Other stops along the way include Stockton, Modesto, Merced, Martinez, and Fresno. Thruway bus connections to San Francisco are made at Emeryville. The Altamont Corridor Express (ACE) is a commuter rail service that connects Stockton to San Jose. The ACE service is named for the Altamont Pass, through which it runs. The 86- mile (138 km) route includes ten stops, with travel time of about 2 hours and 12 minutes end-to-end. ACE runs four round trips daily with annual ridership of 1.5 million passengers. ACE trains depart Stockton in the morning with return departures from San Jose in the afternoon. ACE service has ten stations through San Joaquin, Alameda, and Santa Clara County with bus connections to other transit including Bay Area Rapid Transit (BART) in Pleasanton.	Add "caltrain" connection in San Jose Diridon and Santa Clara.
2	Appendix C, p. 37-39: After breaking ground in 2015, construction of the California High-Speed Rail is well underway in the San Joaquin Valley. The California High-Speed Rail System will be the first 200+ mph highspeed rail system in the nation. The California High-Speed Rail Authority ("Authority") is proposing an Initial Operating Section (IOS) from Merced to Bakersfield. The Merced to Fresno Project Section is part of the first phase of the high-speed rail system. The Authority plans to begin operations of service in 2032, at which time Merced will become the southern terminus	No comment
3	Appendix C, p39-40: The primary role of SJJPA is the day-to-day management of the Gold Runner Amtrak System. The SJJPA will be responsible for managing the High-Speed Rail IOS for the Merced to Bakersfield Segment. Recent activities of the SJJPA have included focusing on short-term service improvements, pre of the High-Speed Rail Authority (HSRA) in the implementation of highspeed rail through the Central Valley and the San Joaquin Valley Joint Powers Authority (SJJPA) in support of enhanced Gold Runner Amtrak service. These activities have involved: • Supporting Amtrak service expansion to 9 daily round trips in the San Joaquin Valley • Expanding through-way bus services with a variety of transit services providers • Advancing renewable diesel engine initiative for commuter rail emission reduction • Relocation of the Madera Amtrak Station • Reducing overall run times between Bakersfield and Norther California destinations • Launching	Through-way should read "thruway", and highspeed rail should "high-speed rail". "San Joaquin Valley Joint Powers Authority (SJJPA) should be changed to read "San Joaquin Joint Powers Authority (SJJPA). Delete "Merced Intermodal Track Connector (MITC) Project. Merced to San Jose route launched January 2026

R-2-1

R-2-2

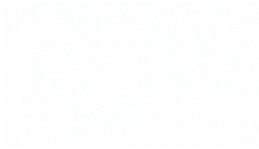
R-2-3

	Merced to San Jose Thruway Bus Route Pilot Program • Strategic Integration with High-Speed Rail service • Merced Intermodal Track Connector (MITC) Project • Stockton Diamond Grade Separation Project		R-2-3 cont.
4	Appendix C, p.40 - Senate Bill 132 was adopted in April 2017, assigning \$400 million for the purpose of extending the Altamont Corridor Express into Ceres and Merced by the year 2027. Senate Bill 132 aligns with the San Joaquin Regional Rail Commission (SJRR) Valley Rail Ceres-Merced Extensions planning effort, which supports both the enhancement of exiting ACE service between Stockton and San Jose as well as extend ACE service to Manteca, Modesto, Turlock and Merced. The San Joaquin Valley transportation partners will also continue to work with the California HSRA to support the implementation of high-speed rail within the SJV as the initial operating phases are complete and services are initiated.	Include "service-led planning" to have a blended ACE and Gold Runner schedule with Valley Rail Completion.	R-2-4
5	The Valley Rail Sacramento Extension Project would expand Amtrak Gold Runner and Altamont Corridor Express (ACE) passenger rail services to the greater Sacramento area through the construction of six new rail stations and track improvements along the Union Pacific Railroad (UPRR) Sacramento Subdivision train tracks. The Project includes the potential implementation of two new roundtrips of Gold Runner service operating on the Sacramento, Fresno, and BNSF Stockton Subdivisions, as well as an extension of existing ACE service to the proposed Natomas Station. The Project also includes service from the proposed Natomas Station to the Ceres ACE Station included in the ACE Extension Lathrop to Ceres/Merced project. The six new stations would be constructed in the following locations: Lodi, south Sacramento (to be named the "North Elk Grove" station), City College, Midtown Sacramento, Old North Sacramento, and Natomas/Sacramento Airport (with a shuttle connection to and from the Sacramento International Airport).		R-2-5
6	Appendix C, P. 40-41: Other planned passenger rail services in the San Joaquin Valley include Valley Link, Cross Valley Corridor (CVC), and Fresno Regional Rail. Valley Link is a 42-mile passenger rail service over the Altamont Pass, providing a new, zero-emission transit alternative to congested Interstate 580. The 22-mile initial operating phase, which could break ground as early as 2025, will provide all-day, bi-directional service between the Dublin/Pleasanton BART Station in the San Francisco Bay Area and a new Valley Link station in Mountain House in San Joaquin County. Service will ultimately extend to the North Lathrop Transfer Station, where it will connect with ACE service. The planned Cross Valley Corridor (CVC) passenger rail service will utilize an existing freight rail corridor from Huron to Porterville, roughly paralleling state routes 198 and 65. Destinations along the corridor include Naval Air Station (NAS) Lemoore, Hanford, the HSR Kings/Tulare Station, Visalia, and Porterville, with additional transit connections to Corcoran, Tulare, Dinuba, and Woodlake. Initially, the CVC will be served by expanded and improved express buses connecting key markets along the corridor to the Kings/Tulare HSR Station. Planning will be initiated for a new passenger rail service that utilizes existing freight rail corridors in Fresno County between Firebaugh, San Joaquin, Dinuba, Kingsburg, and Fresno. Regional service would connect with the Fresno HSR Station and to future light rail service being planned for downtown Fresno.	Timeframe for Valley Link, TBA. Scope for Valley Link service IOE is Vasco Road ACE, with connections to ACE. Typo should be corrected, "initiated" should be "initiated".	R-2-6
7	Longer-distance Thruway buses will continue to bring San Joaquin Valley travelers to destinations throughout California. At the Bakersfield HSR Station, these buses will meet every HSR round-trip for connections to major travel markets in Southern California, as well as Las Vegas. Local transit and on-demand services will also link to HSR, Valley Rail, Valley Link, Cross Valley Corridor, and Fresno Regional Rail, allowing car-free travel to destinations within and outside San Joaquin Valley.	We are in the midst of our Thruway Bus Study which is to identify where routes that connect with Gold Runner are cost-effective, identify routes or corridors that need improvement (service, routing, marketing), identify corridors that need elimination, and identify where governance would be improved if given a partnership opportunity. the SJJPA expects coordination with Fresno COG during the study as well as opportunities in the future.	R-2-7
8	Seek funding to address multimodal transportation needs in the region and incentivize transportation investments that benefit disadvantaged communities. Examples include: FTA 5307 and 5311, SB 125, ATP, CMAQ, STBG, TOD	We should explore those funding opportunities for infrastructure for the greater SJ Valley in hopes to provide service in the Valley Rail South corridor. This also includes providing guidance and support to assist with consulting the host railroads.	R-2-8
9	Coordinate with regional transit providers to seek operational and administrative efficiencies.	This is ongoing with our respective Short Range Transit Plans for each of the sub regions. Efforts should be made to help address connectivity to reach and meet trains on both corridors, including first- and last-mile corridors.	R-2-9
10	Annually conduct outreach, through the unmet transit needs process, to identify transit needs that are reasonable to meet throughout the region with an emphasis on disadvantaged communities.	Outreach should be made in preparation and before launch of service, including identifying service planning opportunities to reach disadvantaged communities.	R-2-10
11	Support efforts to implement high-speed rail and station area planning in the region.	We anticipate further service planning development, including scheduling, once the Initial Operating Corridor begins.	R-2-11

Dave Sorrell, TDM-CP (He/Him/Y'all - [Why is this important?](#))
Senior Planner (Bay Area Region), Planning, Grants, & Programming Department

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 [Book time to meet with me](#)

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2.2.2 San Joaquin Regional Rail Commission (SJRRC)

Comment Code: R-2

Date: August 17, 2026

Because this comment does not raise concerns regarding the adequacy of the information or analysis provided in the Draft PEIR, the Fresno COG is not required under CEQA to address these comments in the Final PEIR. However, in order to provide a consistent, accessible, and transparent location for all comment responses, the Fresno COG has elected to address comments related to the 2026 Draft RTP/SCS, Draft 2027 FTIP, and Draft Conformity Analysis for the 2027 FTIP and the 2026 RTP within this Final EIR. It should be noted that the comments below do not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft PEIR, or that impacts would be substantially more severe than those identified in the Draft PEIR.

Response to Comment R-2-1

This comment requests that the Caltrain service be added to Appendix C: Valleywide Chapter.

Thank you for the comment. The Caltrain commuter rail service does not directly serve the San Joaquin Valley and thus is not included in those rail services that directly serve the region.

Response to Comment R-2-2

This comment highlights the California High-Speed Rail section of Appendix C: Valleywide Chapter.

Thank you for the comment.

Response to Comment R-2-3

This comment requests some grammatical edits, and for the deletion of the Merced Intermodal Track Connector (MITC) Project in Appendix C: Valleywide Chapter.

Thank you for the comment. These edits have been incorporated into Appendix C: Valleywide Chapter. It should be noted that Chapter 3.0, Errata, of this Final PEIR only presents specific changes to the text of the Draft PEIR. The updated RTP Checklist and Final RTP (including appendices) will be submitted to the SJRRC once the Fresno COG Policy Board approves the final documents.

Response to Comment R-2-4

This comment highlights the Valley Rail Program and the blended service plan between the Altamont Corridor Express (ACE) and Amtrak Gold Runner in Appendix C: Valleywide Chapter.

Thank you for the comment.

Response to Comment R-2-5

This comment highlights the Valley Rail Sacramento Extension Project section of Appendix C: Valleywide Chapter.

Thank you for the comment.

Response to Comment R-2-6

This comment highlights the Valley Link project and recent scope changes for the project, as well as a typo in Appendix C: Valleywide Chapter.

Thank you for the comment. The typo has been corrected in Appendix C: Valleywide Chapter. It should be noted that Chapter 3.0, Errata, of this Final PEIR only presents specific changes to the text of the Draft PEIR. The updated RTP Checklist and Final RTP (including appendices) will be submitted to the SJRRC once the Fresno COG Policy Board approves the final documents.

Response to Comment R-2-7

This comment highlights SJRRC's ongoing Thruway Bus Study and the coordination with Fresno COG staff during the study. Thruway bus services are highlighted in Appendix C: Valleywide Chapter.

Thank you for the comment. The Fresno COG appreciates its collaboration with SJRRC/SJPA for the Thruway Bus Study and other coordination efforts between the two agencies.

Response to Comment R-2-8

This comment highlights the available funding opportunities for infrastructure to support the Valley Rail South corridor improvements in the future.

Thank you for the comment.

Response to Comment R-2-9

This comment highlights the Short Range Transit Plans, with an emphasis on addressing connectivity to reach and meet trains with first- and last-mile corridors.

Thank you for the comment.

Response to Comment R-2-10

This comment requests outreach activities be made in preparation for launch of new services, including identifying service planning opportunities to reach disadvantaged communities.

Thank you for the comment.

Response to Comment R-2-11

This comment remarks on the anticipation of further service planning development, including scheduling in regards to the Initial Operation Service for the California HSR Project in the San Joaquin Valley.

Thank you for the comment.

2.3 MEMBERS OF THE GENERAL PUBLIC

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JOSEPH D. PETTA
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July 29, 2026

Via Electronic Mail

Fresno County Council of Governments
 Members of the Policy Board
 Attn: Paul Herman, Deputy Director
 2035 Tulare Street, Suite 201
 Fresno, CA 93721
 pherman@fresnocog.org

Re: Agenda Item II.A: 2026 Regional Transportation Plan/Sustainable
 Communities Strategy (RTP/SCS) Draft Program Environmental
 Impact Report, State Clearinghouse No. 2025050609

Honorable Members:

This firm represents Fresno Building Healthy Communities (“FBHC”) in connection with the Fresno County 2026 Regional Transportation Plan/Sustainable Communities Strategy (“RTP/SCS” or “Project”). We submit these comments to inform the Fresno County Council of Governments (“COG”), as the Project’s lead agency, about the serious potential consequences of a recent decision by the Fresno County Board of Supervisors (“County Board”) for the legal adequacy of the Project’s Draft Program Environmental Impact Report (“DEIR”) under the California Environmental Quality Act (“CEQA”), Public Resources Code § 21000 et seq., and the CEQA Guidelines, California Code of Regulations, title 14, § 15000 et seq. (“CEQA Guidelines”).

For the reasons that follow, the COG may not certify the EIR as drafted if the County Board fails to place the Fresno County Transportation Improvement Act (“FCTIA” or “Measure C Renewal”) on the 2026 general election ballot and give the public the chance to vote to preserve billions of dollars of urgently needed transportation funding for the next thirty years.¹ To prevent having to revise and recirculate the

¹ We submit this letter to specifically inform the COG about the potential effects of delaying placement of the FCTIA on the 2026 general election ballot on the legal

Project’s EIR, the COG should—with one voice—urge the County Board to reconsider its earlier decision and certify the Fresno County Transportation Improvement Act for the 2026 general election ballot.

P-1-1
cont.

I. Background

As you are aware, on Tuesday, July 14, 2026, a majority of the County Board voted to effectively delay ballot placement of the FCTIA, which would extend the County’s current half-cent transportation sales tax (“Measure C”). *See* Julianna Morano, *Fresnoland, Three Fresno Supervisors Shut Down Better Roads Tax Measure After Tense Clash* (July 14, 2026).² For the FCTIA to be on the 2026 general election ballot, County staff will now have to complete a fiscal impact report on the measure before the state-mandated balloting deadline of August 7, 2026—a timeline that staff have indicated they may not be able to meet. *Id.* Should the FCTIA (or a replacement measure) be delayed past the 2026 general election, as now appears likely, the County’s transportation sales tax will expire on June 30, 2027. *See* Fresno County Transp. Auth. Bd., Measure “C” Extension Strategic Implementation Plan, at 1 (Nov. 2015).³

P-1-2

Should it stand, the Board of Supervisors’ 3-2 vote to order a study under Elections Code section 9111, rather than act directly on the FCTIA, functionally forecloses the measure from the November 2026 ballot. As a practical matter, that timeline means the earliest opportunity for voters to weigh in on a replacement would shift to 2028.⁴ Using the campaign’s economic analysis, even a two-year delay translates conservatively to around \$185 million in countywide transportation revenue that will not be collected. *See* Exh. A (Penbera & Ruditsky, IMPLAN Based Economic Analysis for the Fresno County Transportation Improvement Act (FCTIA) Measure, at 13 (June

adequacy of the DEIR. This letter is not exhaustive of FBHC’s comments on the DEIR as a whole, and FBHC reserves the right to submit further comments before the expiration of the DEIR comment period on August 17, 2026.

² Available at <https://fresnoland.org/2026/07/14/three-fresno-supervisors-shut-down-better-roads-tax-measure-after-tense-clash>.

³ Available at <https://www.fresnocog.org/wp-content/uploads/publications/2015-Measure-C-SIP-112415.pdf>.

⁴ Because county ballot initiatives must be adopted only during even-year general elections, the FCTIA would not be able to appear on the ballot until the 2028 presidential primary election, resulting in an *absolute minimum* 9-month lapse in funds between July 2027 and March 2028. *See* Elec. Code §§ 1405, 9118.

2026)).⁵ The stakes of this potential funding cliff extend well beyond Fresno County: the League of California Cities’ most recent statewide needs assessment, released in June 2026, found that California’s cities and counties face an \$82.1 billion shortfall over the next decade just to bring local streets, roads, essential safety components, and bridges into a state of good repair. *See* League of California Cities, California Statewide Local Streets and Roads Needs Assessment Final Report, at 4 (June 2026).⁶ Delaying or eliminating the one ballot measure built to replace Measure C moves Fresno County in exactly the wrong direction.

P-1-2
cont.

Supporters have framed the measure as one built by “the voters who drive these roads, ride these buses, walk these neighborhoods,” and created for the schoolchildren and families who depend on them throughout the county. Many urban and rural communities alike are in serious need of targeted investment in transportation infrastructure. Delaying the vote on the FCTIA removes the funding mechanism specifically designed to direct more transportation dollars toward street and road safety improvements, transit, and active-transportation infrastructure serving these communities, with no assured timeline for a successor process. Without a replacement, the County’s roads, transit service, and rural transportation options will continue to deteriorate.

Separately, allowing Measure C to expire and delaying placement of the only viable replacement measure until at least 2028 undermines Fresno County’s ability to meet its obligations under Senate Bill 375 (“SB 375”) and other state and federal planning laws. Meeting planning mandates is a precondition for the region to remain eligible for federal and state transportation funding. A funding vacuum following Measure C’s 2027 expiration directly undercuts the County’s capacity to deliver the transit expansions, active-transportation facilities, and complete-streets improvements that the RTP/SCS and other County plans rely on to achieve the County’s vehicle miles traveled and greenhouse gas (“GHG”) reduction targets. Losing or delaying this revenue leaves a gap between the emissions-reduction commitments Fresno COG has made to the state, and the on-the-ground funding needed to satisfy them. This would expose the County’s planning documents to arguments that they no longer rest on reasonably foreseeable funding assumptions, and frustrate SB 375’s purpose of reducing passenger-vehicle GHG emissions through coordinated transportation and land-use investment.

P-1-3

⁵ Available at <https://betterroadssafeststreets.com/wp-content/uploads/2026/07/BRSS-Economic-Impact-Study.pdf>.

⁶ Available at <https://savecaliforniastreet.org/wp-content/uploads/2026/07/2026-Statewide-Report-compressed-FINAL.pdf>.

None of this should be lost on your membership. Indeed, many of your members have already warned the County Board and the public about the severe fiscal consequences and impacts to transportation infrastructure that would result from Measure C's expiration without a renewal or replacement. *See* Julianna Morano, *Fresnoland, It's the Final Round of One of Fresno's Biggest Political Fights – And It's not Just Red vs. Blue* (July 13, 2026).⁷

P-1-3
cont.

The purpose of this comment is to further inform the COG that Measure C's expiration will *also* threaten the legal adequacy of the EIR for the County's RTP/SCS and risk exposing the Project to liability under CEQA. More specifically, the EIR's project description, its finding of a less-than-significant environmental impact due to conflicts with local circulation policies, and its analysis of alternatives, will all be inadequate should it be certified on the assumption that FCTIA or replacement funds will be available—unless the Measure C Renewal or a replacement measure appears on the 2026 general election ballot. Should the County Board delay the possibility of the County's transit agencies receiving these funds past 2027, the EIR will not adequately describe the environmental impacts of the proposed Project, and will fail to meet CEQA's fundamental purpose of disclosing the Project's environmental effects to the public.

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II. The Project description will be incomplete, inconsistent, and inaccurate unless a renewal or replacement of Measure C is on the ballot in 2026.

A CEQA document must provide a comprehensive description of the contemplated project in order to adequately describe its environmental impacts. “An accurate, stable and finite project description is the *sine qua non* of an informative and legally sufficient EIR.” *San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal.App.4th 713, 730. Furthermore, “[a]n accurate project description is necessary for an intelligent evaluation of the potential environmental effects of a proposed activity.” *Id.* (citation omitted). Thus, an inaccurate or incomplete project description renders the analysis of significant environmental impacts inherently unreliable. The EIR would fail to meet this threshold requirement in two critical respects if certified without the FCTIA appearing on this year's ballot.

P-1-5

First, without a renewal or replacement of Measure C funds, the Project description will be facially inaccurate. The DEIR describes “[t]he proposed 2026 RTP/SCS” as “identif[ying] anticipated funding allocations for transportation projects and demonstrat[ing] how the Fresno COG will achieve its targets for GHG emission reductions, consistent with SB 375 and other regional goals.” DEIR at 3-44. It further

⁷ Available at <https://fresnoland.org/2026/07/13/better-roads-safe-streets>.

specifies that the RTP section of the Project includes “only those projects that are financially constrained (meaning that funding is reasonably available based on the revenue forecast),” as required by federal law. DEIR at 3-46. In turn, “the financial calculations provided in the 2026 RTP/SCS rely on the . . . [assumption that] . . . Measure C, Fresno County’s local half-cent sales tax for transportation improvements, will be renewed and/or augmented before it expires in 2027.” DEIR at 3-64; *see also* DEIR at 3-66, tbl. 3.D (showing Measure C and anticipated Measure C Renewal funds as the sole “local” funding sources for the Project components). Indeed, based on the renewal or replacement of Measure C, the DEIR anticipates that the fraction of local funds available for Project components, relative to total funds, will actually increase over the life of the Project, from 33% in 2026 to 39% by 2049. *See* DEIR at 3-66 to 3-68, figs. 3-6 to 3-8. If a renewal or replacement for Measure C fails to be placed on the ballot in 2026, the foregoing assumptions will be flatly inconsistent with fiscal reality. Because (as the COG admits), a “constrained” project list is a required component of the Project under the COG’s federal transportation planning obligations, the DEIR would necessarily fail to describe a “required element” of the Project should the Measure C Renewal not reach the ballot this year. *San Joaquin Raptor*, 27 Cal.App.4th at 731.

Second, the DEIR’s project description would fail the CEQA Guidelines’ technical requirements if a renewal or replacement of Measure C is not placed on the 2026 ballot. An EIR must describe the Project’s “technical, *economic*, and environmental characteristics.” CEQA Guidelines § 15124(c) (emphasis added). While the EIR is not obligated to analyze economic impacts, an accurate *description* of the project’s economic characteristics is necessary whenever “there is a direct relationship between” those characteristics and a project’s environmental effects, and it “can provide helpful context” for the EIR’s analysis of the economic feasibility of alternatives regardless. *See* Kostka & Zischke, Practice Under the California Environmental Quality Act (2d ed Cal CEB) § 12.14. One of the core purposes of the Project here is describing “programs and policies for transportation . . . finance” within Fresno County over the next decades. DEIR at 3-1. Furthermore, a proper description of funds available for the COG’s transportation plan is directly related to its environmental effects, because many of the Project components are federally or state-funded, and such funding is itself dependent on adoption of an RTP with a proper “constrained” project list that only lists planned projects with reasonably available funding sources. *See* DEIR at 1-2 to 1-3 (preparation of an RTP/SCS in conformance with federal requirements “ensures the eligibility of the Fresno region for federal and State funding for transportation planning and improvements”). Because the environmental effects of the proposed Project are necessarily dependent on its components being funded and carried out, the COG would need to revise the DEIR in the

P-1-5
cont.

event of a Measure C funding shortfall in order to accurately describe the Project's economic characteristics.

P-1-5
cont.

III. Unless a renewal or replacement of Measure C appears on the 2026 ballot, the DEIR will fail to analyze potentially significant transportation impacts that would result from conflicts with other transportation policies.

Under the CEQA Guidelines, a project would have a significant impact with respect to transportation if it would conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. CEQA Guidelines, app. G, § XVII.a. The DEIR establishes this criterion as a threshold of significance (Threshold 4.17.1) and concludes that the Project would result in a less-than-significant impact. DEIR at 4.17-26 to 4.17-27. Without funding from a Measure C renewal, however, the DEIR fails to adequately analyze this potential impact.

The DEIR states that the 2026 RTP/SCS includes a list of 2,827 financially constrained projects addressing various types of transit facilities from the transit plans for Fresno Area Express, Clovis Transit, the Fresno County Rural Transit Agency ("FCRTA"), and the Fresno County Regional Long Range Transit Plan. The DEIR explains that, because the Project would be aligned with the plans, the project would have less than significant impacts related to conflicts with related plans and programs. DEIR at 4.17-26 to 4.17-27. However, like the analysis of other topic areas, the DEIR's analysis of the project's potential conflicts with programs, plans, ordinances or policies addressing transit facilities assumes Measure C funding will be available for implementation of the proposed programs. DEIR at 4.17-26.

P-1-6

As discussed throughout this letter, the DEIR never considers a scenario where Measure C funding is not available after 2027. If Measure C expires without replacement, though, more than a third of the funding needed for the planned transit programs would be unavailable. DEIR at 3-66 to 3-68. Without Measure C funds, many of the existing transit programs and/or proposed improvements are likely to be eliminated. The result will be that local transit agencies would implement only a fraction of the planned programs. Thus, if a renewal or replacement of Measure C does not appear on the ballot this fall, the proposed RTP/SCS will immediately be inconsistent with any local transit plans and programs that rely upon Measure C Renewal funding to provide transit services to rural and urban riders in Fresno County, and which would no longer occur. *See also* DEIR at 3-46 ("The 2026 RTP will be in effect upon its adoption.").

As the county's transportation agencies have made clear, this scenario would wreak havoc on the communities that depend on various multi-modal programs in their daily lives. Fresno County residents, particularly those in disadvantaged communities, rely on Measure C-dependent transit programs, such as rural bus routes, inter-city "life-line" bus service, free or reduced fare vouchers for seniors and students, and vanpools for transportation to jobs and service centers. *See* FCRTA 2026-2027 Budget, at 3, 5-6 (June 25, 2026).⁸ The FCRTA budget specifies that, if Measure C funding is not renewed or replaced, it is likely to have serious consequences for the agency. The FCRTA's budget states that the loss of Measure C funding will result in a cutback of FCRTA transit services throughout Fresno County and several programs that "[include] any match and or subsidy to any agreements." *Id.* at 3. Because FCRTA's adopted budget states that cuts are certain to occur should Measure C funding lapse, including matching funds outside its control, it would conflict with an RTP/SCS that relies on this funding being available, and undermine the EIR's basis for finding a less-than-significant impact based on Threshold 4.17.1.

P-1-6
cont.

Aside from the Project being inconsistent with any and all local plans and programs that would no longer occur should Measure C not be renewed, the RTP/SCS would also be inconsistent with SB 375 and with State goals under AB 32 and the Climate Change Scoping Plan. *See generally* Exh. B (California Air Resources Bd., *SB 375 Regional Targets*, <https://ww2.arb.ca.gov/our-work/programs/sustainable-communities-program/sb-375-regional-targets> (last visited July 27, 2026)); California Air Resources Bd., 2022 Scoping Plan for Achieving Carbon Neutrality (Dec. 2022).⁹ SB 375 sets regional targets for the reduction of greenhouse gas emissions consistent with AB 32 and state goals for achieving carbon neutrality by 2045. As acknowledged in the DEIR, the RTP is supposed to "demonstrate how the Fresno COG will achieve its targets for GHG emission reductions, consistent with SB 375 and other regional goals." DEIR at 3-44. Yet, without Measure C funding, the County would reduce only a fraction of the greenhouse gas emissions targeted to meet state goals under SB 375 and AB 32. Therefore, if a renewal or replacement of Measure C is not on the ballot in November of this year, and related funding is not available after 2027, the Project will be inconsistent with both local transit plans and with state mandates to reduce greenhouse gas emissions from transportation. This inconsistency flatly undermines the DEIR's finding of a less-than-significant impact due to lack of conflict with other transportation policies.

P-1-7

⁸ Available at <https://www.ruraltransit.org/wp-content/uploads/2026/05/FCRTA-2627BUDGET-EFILE.pdf>.

⁹ Available at <https://ww2.arb.ca.gov/sites/default/files/2023-04/2022-sp.pdf>.

IV. Should a renewal or replacement of Measure C not appear on the 2026 ballot, the EIR will fail to adequately consider alternatives to the Project.

Under CEQA, an EIR must consider a “reasonable range” of alternatives “that will foster informed decision making and public participation.” CEQA Guidelines § 15126.6(a); *Laurel Heights Improvement Assn. v. Regents of the University of California* (1988) 47 Cal.3d 376, 404 (“An EIR’s discussion of alternatives must contain analysis sufficient to allow informed decision making.”). The discussion of alternatives must focus on alternatives that are capable of avoiding or substantially lessening any significant effects of the Project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly. CEQA Guidelines § 15126.6(b). The Guidelines further require the agency to identify the “environmentally superior alternative.” *Id.* § 15126.6(e)(2). An EIR must identify alternatives that, among other factors: (1) “would attain most of the basic objectives of the project,” (2) are “potentially feasible,” and; (3) are “reasonable.” *Id.* § 15126.6(a), (c). The EIR must also “include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project”—including comparison of adverse environmental impacts of each alternative with adverse impacts of the proposed project, and identification of the environmentally superior alternative. *Id.* § 15126.6(d).

Here, the DEIR considers five alternatives to the proposed Project (including the no-project alternative). All but the no-project alternative rely on the availability of Measure C Renewal or replacement funds after Measure C expires in 2027. *Compare* 2026 Regional Transportation Plan/Sustainable Communities Strategy, app. B, Items 4 & 5 (identifying the Measure C Renewal as one of the “principal sources anticipated to be available for funding of the RTP projects” and including it in revenue projections), *and id.* app. B, Item 6, at 1 (identifying the foregoing revenue projections as the source of assumptions on available revenues for the Project and build-out alternatives), *with* DEIR at 5-7 (assuming no buildout of any component that would rely on post-2027 sales tax funds for the no-project alternative). Should Measure C expire without an immediate replacement, the DEIR’s analysis of alternatives will fail CEQA’s requirements in four critical respects.

CEQA requires that alternatives to a Project be at least potentially feasible. *See Watsonville Pilots Assn. v. City of Watsonville* (2010) 183 Cal.App.4th 1059, 1089 (“The purpose of an EIR is *not* to identify alleged alternatives that meet few if any of the project’s objectives so that these alleged alternatives may be readily eliminated.”). The elimination of the Measure C funds would undermine the feasibility of Alternatives 2 through 5 (i.e. the discussed alternatives other than the no-project alternative), because they would all result in reduced levels of investment and no longer meet most Project

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objectives—which depend on increased investment in the COG’s transportation priorities. *See* DEIR at 5-56 to 5-58 (discussing where alternatives meet Project objectives due to including targeted levels of investment). Because the DEIR identifies the no-project alternative as also infeasible due to inability to meet Project objectives (*see* DEIR at 5-55), the document would be left with zero potentially feasible alternatives. CEQA does not allow lead agencies to narrow their consideration of reasonable alternatives in this way. But this would be the inevitable result of certifying the DEIR despite knowing that Measure C funds will lapse without replacement.

Likewise, the lapse in Measure C funds would make the DEIR’s stated alternatives to the Project unreasonable. “The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making.” CEQA Guidelines § 15126.6(f). It is unnecessary for an agency to consider alternatives whose effects cannot be reasonably ascertained or whose implementation is speculative. *See In re Bay-Delta Programmatic Env’tl. Report Coordinated Proceedings* (2008) 43 Cal.4th 1143, 1163. If a renewal or replacement of Measure C is not placed on the ballot this year, just that would happen. All of the DEIR’s alternatives except the no-project alternative would become speculative: contingent on funding that would not become available until at least 2028, and (if approved) is unlikely to be collected in an amount that could make up for more than a year of uncollected revenues. As such, the DEIR as drafted would no longer be able to analyze a range of alternatives that could meaningfully inform the public of their comparative environmental impacts.

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cont.

Even if the alternatives were reasonably feasible in the barest sense of the term despite a funding lapse, the DEIR would still fail its informational requirements because it would no longer adequately *describe* Alternatives 2 through 5. A discussed alternative cannot be “ambiguous” about its scope in a manner that undermines comparison of its environmental impacts with those of the proposed project. *Preservation Action Council v. City of San Jose* (2005) 141 Cal.App.4th 1336, 1356. The record here contains only high-level funding targets by project type for each of Alternatives 2 through 5. *See* 2026 Regional Transportation Plan/Sustainable Communities Strategy, app. B, Item 5, at 2. It does not discuss whether the funding for each component could be prorated, or whether it would need to be adjusted based on particular components’ eligibility for other funding sources, should one source be lost. As a result, the effect of the loss of Measure C Renewal or replacement funds on the list of components that could be built out under each alternative, and the ensuing environmental impacts of those altered buildouts, in comparison to the effects of the Project, are not ascertainable from record evidence. This resulting ambiguity would fatally undermine the DEIR’s analysis of those alternatives.

Finally, for the same reason, a Measure C funding lapse would cause the DEIR to fail to identify the environmentally superior alternative. If a no-project alternative would be environmentally superior, an EIR must *also* specify an environmentally superior alternative from among the other considered alternatives. CEQA Guidelines § 15126.6(e)(2). The DEIR appears to discuss both the no-project alternative and Alternative 4 as environmentally superior alternatives, in part due to Alternative 4's "greater emphasis on transit investment." DEIR at 5-60. Should Measure C's funding lapse without a replacement, the COG would no longer have substantial evidence to identify which (if any) of Alternatives 2 through 5 are environmentally superior, because their likely buildout patterns will become fatally ambiguous.

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cont.

In sum, the failure to place the Fresno County Transportation Improvement Act on the 2026 general election ballot would seriously undermine the EIR's discussion of alternatives, and render it insufficient to meet CEQA's mandate to disclose the environmental impacts of a reasonable range of alternative proposals in addition to those of the Project.

V. Conclusion

For the foregoing reasons, FBHC urges the COG Policy Board take all possible measures to advocate for the County Board to call a special meeting before August 7, 2026 to reconsider its earlier decision and order the Fresno County Transportation Improvement Act—the only measure eligible to be voted on—onto the 2026 general election ballot.

Should the approval of a Measure C renewal or replacement be delayed past 2027, FBHC respectfully requests that the COG withhold certification of the EIR and recirculate it so that it can accurately describe, analyze, and mitigate any significant effects on the environment that would result from Project changes due to a lapse in Measure C funds. Without such changes, the EIR could not be lawfully certified and the Project would face serious risk of challenge under CEQA.

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Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP



Joseph "Seph" Petta, Attorney

Attachments

Exhibit A – Penbera & Ruditsky, IMPLAN Based Economic Analysis for the Fresno County Transportation Improvement Act (FCTIA) Measure (June 2026)

Exhibit B – California Air Resources Bd., *SB 375 Regional Targets*,
<https://ww2.arb.ca.gov/our-work/programs/sustainable-communities-program/sb-375-regional-targets> (last visited July 27, 2026)

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Exhibit A

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**IMPLAN Based Economic Analysis
For the
FRESNO COUNTY TRANSPORTATION IMPROVEMENT ACT (FCTIA) MEASURE**

Prepared by: PenberaParis, LLC
Joseph J. Penbera, Ph.D., Chairman
Brian Ruditsky, M.B.A., Senior Research Associate

June 2026



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Executive Summary of FCTIA Measure Economic Analysis:

- The Fresno County Transportation Improvement Act Measure (“Measure” or “FCTIA”) is a ½ cent transaction and use tax (sales tax) proposed for Fresno County, California aimed at extending the benefits of the expiring Measure C. The proposed measure would fix neighborhood streets; repair and keep roads in good and safe condition; improve safety for children walking and biking to school; improve public transportation; including free transit services for seniors, veterans, people with disabilities, and students; and repair sidewalks and trails. The Measure would replace Fresno County’s existing half-cent transportation sales tax, set to expire in 2027, providing approximately \$246 million annually and an estimated \$7.4 billion over 30 years. It would also require independent oversight, annual audits, and local control.
- The wording of the Measure is as follows: This Act shall be known, and may be cited, as the “Fresno County Transportation Improvement Act.”
- Contained herein is an economic output analysis, including job creation estimate, utilizing the IMPLAN methodology first developed by the University of Minnesota (MIG, Inc.) and now maintained by the IMPLAN Group, LLC (www.implan.com). IMPLAN is considered a reasonable methodology to determine economic and job creation outputs in defined regions. The most recent IMPLAN software (online version) was utilized, and the most recent data base was purchased (purchased June 2026, latest version 2024), to conduct this analysis. The analysis is based on average projected revenues of \$246 million annually for a total of \$7.4 billion over the life of the sales tax.
- This study was prepared by Dr. Joseph Penbera and Mr. Brian Ruditsky. Dr. Penbera is a well-known economist and former Senior Fulbright Scholar who has both a long history of analyzing local, state, and federal economies and determining their economic health, and, also, an in-depth understanding of Fresno County and the Central Valley of California. He has also authored and presented research comparing IMPLAN and RIMS II methodologies. Mr. Ruditsky acquired his economic training as an MBA student, and has, over the last decade, prepared IMPLAN and economic impact studies, including four projects in the Central Valley, approved by the U.S. Federal government.
- As the Measure states, the use of funds are guaranteed to go directly to Fresno County transportation priorities and nothing else. Money cannot be taken by State or Federal officials. However, the economic impacts from the sales tax will have a larger economic reach, affecting the Central San Joaquin Valley Region (consisting of Fresno, Tulare, Kings, Mariposa, Merced, and Madera Counties) and California.
- This economic impact study found significant economic and job creation activity related to the FCTIA Measure. Below is a Summary of the economic impacts of the Measure over the next 30 years.

Table 1
Summary of Economic Impacts for the FCTIA Measure for the
30-Year Period

	Impact – Jobs Created	
Total Jobs Created		68,190.21
	Impact- By Category-in U.S. Dollars	
Labor Income		\$5,060,443,076
Employee Compensation		\$3,532,568,624
Proprietor Income		\$1,527,874,453
Other Property Type Income		\$2,125,605,171
Indirect Business Taxes		\$520,635,088
Total Value Added		\$7,706,683,335
Total Output		\$13,458,684,684
Federal Taxes		\$1,150,949,519
State Taxes		\$478,785,562
County Taxes		\$61,739,762
Household Spending, Local Area		\$2,890,980,342

1. Reason for the Economic Impact Study:

The purpose of this economic impact Study is two-fold: first, to systematically estimate the regional benefits of the Measure through the application of tested methodology which can be followed by professional economists such that they can duplicate the results, and, otherwise, attest that the findings are valid; and, second, to provide the public – who are the ultimate stakeholders and generate the Measure tax revenue through their purchasing transactions – a work product which contains a narrative of the pathway that the sales tax revenue will follow, specific tables and exhibits which quantify the outcomes, and a summary of these outcomes. The value of the Study, simply stated, is as a means of educating the public and many other stakeholders about what can happen if the funds are administered as proposed in the Measure. It supports a fundamental precept of a democratic society upon which the United States was founded: that informed opinions lead to better decisions.

The Study describes how the inputs to the IMPLAN Study relate to the Measure, traces the IMPLAN protocols utilized in accordance with the IMPLAN software and associated IMPLAN practices, and reports the specific findings in terms of the economic impact of the Measure. The Study strictly relies on the representations contained in the proposed Measure and corresponding public documents previously produced by the Fresno Council of Governments and the Measure proponents. The proponents have confirmed this reliance. Data inputs are based on information from reports and studies directly or indirectly related to the work of the Fresno Council of Governments, or from public documents provided by Measure proponents and accessible online. In the interest of transparency, all sources of information for this analysis are listed in the Exhibits.

2. The IMPLAN Methodology:

IMPLAN has long been accepted by many governmental agencies, the private sector, and many projects as a methodology to model economic findings. Dr. Penbera was invited to speak to Members of Congress in Washington, D.C. and advocated that IMPLAN be recognized as the preferred methodology for studying economic outputs because it generated more valuable information and with fewer possibilities for distorting outputs if the methodology was applied appropriately. In 2012, after he delivered his paper comparing the various regional economic benefits models at the Global Finance Conference held in Chicago, the regional investment center he owns (the California Energy Investment Center), as well as the companies and projects he was advising, began shifting from other methodologies to IMPLAN. In 2022, during the passage of the Reform and Integrity Act, the U.S. Department of Homeland Security published regulations which advised adoption of IMPLAN as the preferred method.

The IMPLAN database is quite rich, and it takes a level of sophistication and experience to understand the User Manual and the software and to apply the proper protocols to the analysis of both IMPLAN and project data. In addition, over the last several years, the IMPLAN Group has invested millions of dollars in updates and improvements. All of this has put a premium cost on the database and the preparation of a Study. It is important to note that for this Study, and as is customary for all of our studies, we have used the most recent software version of IMPLAN and the most current data sets¹ for the region under study.

¹ The most current data was acquired in June 2026.

The following information is derived from the IMPLAN User Guide, and from various other professional descriptions of the methodology as applied. The scientific efficacy of input/output modeling is built on the theoretical constructs of two pioneering economists, Wassily Leontief and Leon Walras. Leontief received the Nobel Memorial Prize in Economic Sciences for development of a national and regional framework for the prediction of the effect of changes in one industry on others, and on government, consumers, and suppliers. Leontief's research is traceable to the general equilibrium theory espoused by Leon Walras in his seminal work, Elements of Pure Economics, published in 1874.

The theoretical formats and formulations lead to practical mathematical modeling which utilize various empirical data bases. These core precepts of a disciplined approach include demonstrating the indirect demand for goods (Walras-Assel model), market flows and growth in the economy, how capital and the desire of capital is a predicate for future services, and the economic changes that are derived from economic choices (known as the Pareto efficiency). When properly applied, IMPLAN modeling can also resolve certain issues crucial to job creation estimation by clarifying how final demand multipliers for output and earnings can be used to estimate direct and indirect economic impacts in the form of direct, indirect, and induced jobs.

The IMPLAN system is a menu-driven microcomputer program that performs complex calculations used to generate social accounts and input/output multipliers. The software performs the necessary calculation -- using the study area data --to create the models. The system allows users to make in-depth examinations of regional, state, multi-county, county or sub-county economies and the impacts that proposed activities are likely to have on these economies.

The IMPLAN data base is second to none in terms of preparing a Study of this kind. Its initial applications were developed for the agricultural sector in the formative years of the national economy. As data collection and statistical analysis became more essential, modeling increased in other sectors and IMPLAN ownership and oversight developed from an academic research base to a more dynamic user base. The accounting conventions for the IMPLAN data track the annual industry accounts produced by the U. S. Bureau of Economic Analysis. This data is reported in the U.S. Benchmark Input-Output Accounts. A benchmark input-output account is produced every five years, soon after the U. S. Economic Census is compiled jointly by the United States Census Bureau (USCB), the Bureau of Economic Analysis (BEA), and the Bureau of Labor Statistics (BLS). In addition to this benchmark input-output account, BEA produces a set of annual industry accounts. Comprehensive and detailed data coverage of the entire U.S. by county, and the ability to incorporate user supplied data at each stage of the model building process, provides a high degree of flexibility both in terms of geographic coverage and model formulation. The basic data are collected by the U.S. Department of Commerce from a variety of sources, such as the Annual Survey of Manufacturers and various annual surveys of the service sector. The data are benchmarked to the Economic Census figures every five years and then updated annually. These figures comprise the national input/output model.

All of this data is pre-processed within the IMPLAN software developed by The IMPLAN Group, LLC. The "processes and calculations" are thus embedded within the programming of the software which renders an "output" based on any "input" in the way a calculator contains mathematical rules for generating output based on data input. To fully understand the complexity of the IMPLAN software and the mathematical models utilized to generate output data requires a deep knowledge of applied economic theory, and experience in preparing and analyzing studies.

PenberaParis has a deep commitment to transparency in economic and financial reporting. Dr. Penbera was appointed Senior Fulbright Scholar in Economics and presented lectures on reporting transparency coincident with the passage of the Sarbanes Oxley Act. As a chairman of the audit committee of private and public companies and a director of two companies which were leaders in their respective industries, he focused on making financial reporting more understandable and accountable. In 2005, he worked in the Office of the Economic Advisor of the President of Poland and was tasked to review the competitiveness of many former public enterprises who were being privatized following the withdrawal of the Soviets from Poland. His paper comparing results of IMPLAN and RIMS II was inspired by his work in Poland and by project analysis relating to the Foreign Immigrant Investor Program under the auspices of the U.S. Homeland Security. When comparing economic outputs of projects of varying sizes, but in the same region, he discovered that, in terms of the empirical results, the job creation outputs were not statistically significant, but the scope and even timeliness of the outputs demonstrated that for a better understanding of economic impacts on a region, there were practical differences which created a preference for the IMPLAN model, including:

- IMPLAN data is updated more frequently than the RIMS II tables.
- IMPLAN has developed an algorithm to fill in the missing numbers where data may be missing for new enterprises because of an absence of these enterprises in a given area.
- IMPLAN generates meaningful tables in a variety of important areas providing the reader with specific economic impacts of a project, thus satisfying the federal government's long recognized requirement that an economic report provides two data sets of information, "job creation" and "economic impact" within the region under study.
- IMPLAN estimates three separate effects, labeled "direct", "indirect" and "induced". The direct effects are based on the economics created by a specific project. The indirect and induced represent the multiplier effects and are usually combined in other input/output models.

Briefly, the *indirect effect* represents purchases made by businesses when their sales rise. For example, a construction firm might order more steel sold in the region. The *induced effect* represents the additional household spending because income has risen. The workers of a construction firm would spend the income they earn from employment on various goods and services, some of which are produced in the region. In general, the larger the region under consideration, and the larger the scope of the underlying purchasing and spending, and depending on the sector, the larger the multipliers would be. In layman's terms, input/output modeling describes a regional or local economy under study in terms of the flow of dollars from purchaser to producers, tracks purchases of, and expenditures on, goods and services in dollars, and traces the flow of dollars between businesses and between businesses and final consumers.

In preparation of the Study, there was a Study Draft offered to the Measure proponents to ensure completeness. Additionally, the Study Draft underwent several passes through the IMPLAN analysis to ensure consistent results. All purchases, including imported goods and services, are identified. When regional economic accounts are created, imports to the region are removed from the initial data, allowing examination of local inter-industry transactions and final purchases. The regional economic accounts are used to construct local level multipliers. Multipliers describe the response of the economy to a stimulus (a change in demand or production). The multipliers represent the Predictive Model. Purchases for final use (final demand) drive an input/output model. Industries producing goods

and services for consumption purchase goods and services from other producers. These other producers, in turn, purchase goods and services. These indirect purchases (or indirect effects) continue until leakages from the region (imports, wages, profits, etc.) represent the end of the cycle. It should be noted that under National Association of Forensic Economists Ethical Precepts, no attempt was made by any person or group to modify the Study in any way that would reflect a departure from the objectivity of findings and professional standards or independence of PenberaParis (www.PenberaParis.com).

The components of the Study include a Table of Contents, Executive Summary, a Summary Table of the Total Economic Impact by Output Category, A Narrative of Key Considerations, Description of the Process and Protocols, Tables and Exhibits, and Attachments. Dr. Penbera has offered, time permitting, to speak with groups, officials, and the media to discuss the Study and its findings.

3. Credentials of Preparers:

Dr. Joseph Penbera.

Dr. Penbera is Chairman of PenberaParis LLC, a California company based in the Fresno area but with a client base that has extended nationally and in foreign countries. He has been cited by Knight Kiplinger, editor/publisher, The Kiplinger Magazine, as one of the best forecast economists in the U.S., and (in 2017) as one of the top economists in the world by the Invest in the US Summit (broadcast by CBS Asia). His opinions are sought out on major economic policy issues facing the nation, state, region, and the world economy. He has been interviewed on KMJ 580/iHeart Radio, the MacNeil Lehrer NewsHour, PBS, and CBS and has been quoted in U.S.A. Today, and many other newspapers. For his ability to investigate complex issues and explain them in ways that are understandable and interesting to the general public, The Business Journal has called him the “Sleuth of the Economic Truth.” Dr. Penbera published the first Statistical Abstracts for the Central Valley of California, the first Fresno area CPI, and a series of Central Valley County Economic Forecasts. Dr. Penbera served as Dean and Professor of The Craig School of Business at CSU Fresno, Eaton Fellow of The Futures Institute, and National Program Chairman of the AACSB, the accreditation body for university business schools. He also served as Senior Fulbright Scholar. He co-founded Fresno Tomorrow for at-risk youth, is Director Emeritus of the San Joaquin River Parkway, and served as the Chairman of the Mayor’s Council of Economic Advisors during both mayoral terms of Alan Autry. He is a member of the Financial Executives Institute and the National Association of Forensic Economists (NAFE) and abides by NAFE’s Statement of Ethical Principles and Professional Practices. He completed the Senior Finance and Audit Programs at the Harvard Business School. He received his Ph.D. from American University, his MPA from the Baruch School, CUNY, and his BA from Rutgers University. He co-authored a book on Business Research which was a Bookwatch BestSeller. He is a U.S. Navy Veteran.

Brian Ruditsky, MBA.

Mr. Ruditsky serves as Senior Research Associate. He received his B.S. from the U.S. Merchant Marine Academy and completed his Master of Business Administration degree at California State University, Fresno. He was trained on the application of the IMPLAN modeling by Professor George Vozikis of The Craig School of Business. Mr. Ruditsky first study came as the head of an IMPLAN MBA team that produced a study of a bioenergy company in the Central Valley that is producing ethanol fuel and jet fuel for the U.S. Navy green fleet initiative and biofuels produced by converting methane from dairies through digestors and distributing energy to the Pacific Gas and Electric system through a state-of-the-art converter. Over the last several years, Mr. Ruditsky has performed many IMPLAN and RIMS II job creation studies both for regional investment centers under the auspices of the U.S. Department of Homeland Security, and for projects based in California and Hawaii. Mr. Ruditsky has worked with Dr. Penbera for more than a decade, and his work is guided by the NAFE's Statement of Ethical Principles and Professional Practices. He is a U.S. Navy Veteran.

Staff Associates.

Maryanne Banich served as Documents Manager and Michael Penbera (director of the California and Hawaii regional investment centers) provided research support.

Special Acknowledgment is made of the work and support of campaign proponents in gathering Measure-specific information. Acknowledgement is also made to those associated with the Fresno Council of Governments and others who prepared various analyses and survey data made available to the public over the course of the 2025 Fresno County Transportation Sales Tax renewal process undertaken (aka Measure C renewal), which helped inform the need for the Measure and the revenue from the Measure that would meet the needs, and information required to develop project categories to which an estimate of spending could be applied.

4. Materials Reviewed and Documentation of Key Inputs to IMPLAN:

(a) Following is a list of publicly available materials that were reviewed:

Exhibit 1: Materials Reviewed and Documentation of Key Inputs to IMPLAN*A. Executive Summary & Core Measure*

1. [Fresno County Transportation Improvement Act. County Counsel Title and Summary 02/10/26](#)
2. [Full Text of Measure from the Act.](#)

B. Revenue Forecasts & Financial Analysis Excel Spreadsheets

3. [2026 Measure C Funding Allocations by Program and Jurisdiction, Nov-6-2025 Steering Committee Meeting.](#)²
4. Spreadsheet: Measure C Extension 2007-2027 Revenue (Final) 26-06-24.³
5. PenberaParis 5-Year Banding by Categories.⁴

² Additional handout at Measure C Renewal Steering Committee meeting held on 11/06/2025.

³ Provided by FCTA. Available upon request.

⁴ Document created by PenberaParis. Available upon request.

C. Regional Planning & Transportation Framework

6. [2026 RTP Projects Dashboard](#)
7. [Measure C Extension Strategic Implementation Plan. Plan Adopted in 2013 and revised in 2024. FCTA-2024-Measure-C-SIP-Update-FV-1](#)
8. [Fresno COG Regional Pavement Management Plan- Full Report, with Exhibits. 11/07/2025.](#)
9. [Fresno COG- 2019-2050 -County Regional Long Range Transit Plan. 6/2019.](#)
10. [Selma ATP -Final. 2018.](#)
11. [Fresno, Vision Zero Task Force, Action Plan. \(Zero Fatalities\). May 2026.](#)

D. Active Transportation & Safety Plans

12. [Fresno City Active Transportation Plan \(ATP\)- Final Draft 05/2026](#)
13. [Ibid. ATP Appendix D, E, F, and H.](#)
14. [Clovis ATP - Final 6/2023](#)
15. [Reedley Moves -ATP and Parkway Master Plan- Final. Fall 2023.](#)
16. [Roads Q&A Fact Sheet. Sept-25-2025 COG Policy Board Meeting.](#)
17. [Public Transportation Q&A Fact Sheet. Sept-25-2025 COG Policy Board Meeting.](#)
18. [Fresno County Regional Active Transportation Plan \(ATP\), May 2024, Chapter 1 – 4.](#)

E. Steering Committee & Community Input

19. [Moving Forward Together. Four Phases. Community Findings. September 2025.](#)
20. [COG Poll re: Opinions on a Fresno County Transportation Funding Measure. Nov-6-2025 Steering Committee Meeting.](#)
21. [Category Informational Presentations. Oct-9-2025 Steering Committee Meeting.](#)
22. [Roads and Public Transportation Presentations. Sept-11-2025 Steering Committee Meeting.](#)

F. Public Health & Environmental Findings

23. [American Lung Association, State of the Air Report, Fresno, 2026.](#)
24. [National Complete Streets Coalition and Smart Growth America: Dangerous by Design, Report, Deadliest Streets in the Deadliest States, Controls for Pedestrians and Bicycles. 2026.](#)

G. BRSS and Other Materials

25. [BRSS campaign document: A Citizen-Led Effort for a Better Fresno County, 2026.](#)
26. [Filed with County Clerk – 2024–25 Zoo Authority Annual Report.](#)

Items 1 through 5, and 26 were specific to forecasting of Revenue for the term of the Measure. Items 6 through 25 were integral to understanding the environmental, social and planning aspects documenting the transportation funding need overall, the general categories which encompass specific types of projects, and the estimated spending in each category. Items 4-5 are specific to estimating the timelines for spending in each category.

(b) Some general comments on the source documents:

As will be indicated in narratives that follow, the annualized revenue growth rates of previously approved sales tax measures were compared to the forecast growth rate for the proposed Measure, and we determined that the growth rate posited for the proposed Measure is within a historical range relative to other measures adopted in Fresno County.

We recognize that there are other funding sources that support transportation maintenance and development activities, but we assumed that the IMPLAN data base accounts already for the flow of funds derived from funding in various sectors associated with transportation in the region. If, for example, the Measure as proposed had included bonding or other borrowing authority, we would have included that additional funding in our analysis. However, it should be noted that the Measure does have bonding authority.

The 2025 needs assessment was very thorough owing to the professional staff work of the Fresno County Council of Governments and its consultants. The information gathering process involved the identification of jurisdictional needs and plans. The COG astutely applied objective standards (PCI, or Pavement Condition Indexing) to establish current road and street conditions, and then identified the funding needed to bring the County from a fair condition status to a good condition status. Based on the growing gap between current spending and the funding needed, it is reasonable to assume that the current fair status will decline to poor status if the gap is not meaningfully addressed.

It is important to note that to properly generate economic outputs through IMPLAN, we recommended that two practical assumptions be made: one relating to the use of general categories of spending and the other relating to dividing the timeline for spending into six, 5-year bands.

These assumptions were made because the identification of specific projects, by date and estimated cost over the next thirty years, was not possible. When IMPLAN is run in a private sector setting, activities (financing, costs, planning, development, third-party interests, control, management, etc.) are defined within the context of a specific project and in a relatively closed, non-public process even when elements may require the public or public agency approval. But attempting to choose all of the Measure's projects now and assigning costs to each is highly problematic because it would both pre-empt the approval of specific projects under the powers, authority, and oversight stated in the Measure, and it would undermine the process of involving the jurisdictions, communities, and various other stakeholders.

Therefore, in modeling the key inputs and outputs, revenue generation and spending was associated with broad categories of need which encompass types of projects. This decision did not inhibit the assignment of various industry codes which influence outputs such as estimating job creation. As to the timing of spending within these categories, (that is, allocating spending according to category over six, 5-year spending bands), this is not usual when a project encompasses a long period, in this instance over a 30-year period.

Finally, we recognized that there might well be a carry-over of funds from one period to the next and interest would be earned on funds held. Using a conservative approach, two revenue scenarios were considered: one with no funds from interest earnings being included, and a second including estimates of interest earned. Due to the challenge of determining the timing of expenditures related to specific projects, a conservative approach was used. This approach assumed interest was earned on the tax revenue and spent the following year.

5. FCTIA Measure Revenue Assumptions:

The estimate of the annual amount of revenue to be generated under the Measure was made by referring to current sales tax measures and associating their revenue generation with the percentage of sales tax as proposed under the Measure. The comparative revenue generated was derived from the following database <https://cdtfa.ca.gov/DataPortal/dataset.htm?url=TaxSalesByCounty>.

An analysis was conducted using Measure C, Measure Z as well as the taxable sales from Fresno County⁵. The Measure as proposed has assumed an annual growth rate of 4%. After comparing the sales tax revenue from Measure C, Measure Z and the taxable sales from Fresno County, the 4.0% growth rate was found to be valid. Table 2 shows the comparison of the FCTIA Measure to Measure Z and the taxable sales.

Therefore, there is a reasonable basis for assuming that \$246 million will be generated annually under the FCTIA Measure.

Table 2 – Validation of the FCTIA Measure Revenue Growth Assumption				
Fiscal Years ⁶	Data Type	Source	Revenue Distributed	Compound Annual Growth Rate (CAGR)
2028-2058	County District	FCTIA Measure Forecast	\$7,398,613,187 (Estimated)	4.0% (Assumed)
2005-2026 ⁷	County District	Measure C	\$1,514,818,687 ⁸	4.02%
2005-2025	County District	Zoo Authority (Measure Z)	\$287,462,652	3.62%
1997-2025	County Taxable Sales	Fresno County	\$395,404,589,391 (Total Revenue)	4.51%

The tax will expire on the 30th anniversary of the operative date.

6. Project Categories:

The Measure dictates that the money raised from the tax will be used for in one of five categories: Neighborhood Streets and Roads Repair and Maintenance Programs, Public Transportation Programs, Access and Innovation, Regional Connectivity, and Administration of the tax. To facilitate the IMPLAN analysis, the proposed Measure expenditures were consolidated into five major program categories. This approach was necessary because the specific projects that will ultimately be funded over the 30-year life of the measure have not yet been identified. Given the long planning horizon, accurately forecasting the type, scale, timing, and duration of individual projects decades into the fu-

⁵ <https://cdtfa.ca.gov/dataportal/dataset.htm?url=TaxSalesByCounty>

⁶ State fiscal years as defined from the state of July to June. For the years 2026-2027 that would be FY2027.

⁷ Based upon information received from FCTA it has been documented that the rate is 4.02%

⁸ Revenue from FY07-08 through May of FY25-26 (11 of 12 months for FY25-26).

ture is not practical. Furthermore, maintaining expenditures at the program level preserves the flexibility intended by the Measure, allowing the oversight committee, Fresno County, and local jurisdictions to direct funding toward future transportation needs and priorities as conditions evolve over time.

Below is a list of the types of projects being considered for funding by the FCTIA Measure's tax revenue.

Table 3 FCTIA Measure Potential Construction Project Types		
Construction Projects	IMPLAN Sector	NAICS
Neighborhood Streets and Roads Repair and Maintenance Program		
Repairing Streets and Roads	57	237310
Building Bike and Pedestrian Facilities	49	237310
Building Regional Trail Connections	51	237310
Adding and Enhancing Crosswalks	57	237310
Funding Infill and mixed-use development	51	237990
Planning Activities to get to shovel ready projects	439	541330
Public Transportation Program		
FAX Enhancements	400	485113
Clovis Transit enhancements	400	485113
FCRTA rural transit support and expansion	400	485113
Microtransit Services	400	485999
On-Demand Services	400	485991
Future transit projects	400	
Access and Innovation Program		
Evaluation of transportation projects	439	541330
Planning of construction of urban and rural multi-modal regional transportation hubs	439	541330
Zero-emission infrastructure	47	237130
Digital connectivity	50	237130
Grid capacity and energy storage	47	237130
Zero or low-cost public transportation fares for special populations	400	485111
Regional Connectivity Program		
Fresno Yosemite International Airport	55	237310
Regional Connectivity Projects	55	237310
Administration, Performance Measures, Requirements, and Indicators Program		
Administration of the function associated with the use of Measure funds	444	541611

7. Regional Information:

A. Study Region Defined:

This tax measure has economic impacts that extend to the state of California. It is assumed that the purchases made with the proceeds from the Measure will be transacted within the State of California to the maximum extent possible. Therefore, when conducting the study, California was used as the regional input in IMPLAN. However, it is important to note that the capital investment is to be within Fresno County.

The IMPLAN model was developed using California as the study region through IMPLAN's Multi-Regional Input-Output (MRIO) framework. This approach allows economic activity generated by the FCTIA Measure expenditures to be traced throughout California while also identifying impacts occurring within Fresno County and the broader Central San Joaquin Valley Region. Because transportation-related purchases and supply chains frequently extend beyond county boundaries, the MRIO framework provides a more comprehensive estimate of economic impacts than a single-county model. Unless otherwise noted, the economic impact tables presented in this study reflect statewide California impacts, while narrative discussions reference Fresno County as the location where the Measure investments occur.

It is also important to note that as Fresno and the mid-section of the State began to experience significant population and commercial growth, there have been attempts to define the counties that should be included in a definition of the Central San Joaquin Valley Region. Some of these definitions included all counties touched by the San Joaquin River. Others seemed to be motivated by attempts to give rural areas a greater political voice and included almost half of the state's 58 counties stretching the region from as far north as Shasta all the way south to Los Angeles County. In the late 1990's, there was an effort to define the regions and develop a development plan for each, and while Fresno was defined as the hub county of the center of the State, the work group never completed its work or even clarified the area to be studied. Various government agencies drew boundaries based upon some sense of how services would be administered. For example, the area defined which applies to medical services included four counties: Fresno, Kings, Tulare, and Madera counties; on the other hand, the Courts of Appeals -5th District area includes nine counties: Fresno, Kings, Tulare, Kern, Madera, Merced, Mariposa, Tuolumne, and Stanislaus.

Appointed as Eaton Fellow in the first think-tank in the CSU system, the Futures Institute, Dr. Penbera studied data sets on social, economic and political characteristics of counties, and authored the initial Statistical Abstracts defining the region as consisting of six core counties –Fresno, Tulare, Kings, Merced, Madera, and Mariposa counties, three extended counties- Kern, Stanislaus, and Tuolumne counties, and one county, San Joaquin, which has been transitioning towards the Sacramento region. It should be noted that the identification of the core counties is consistent with that of the Central Valley Community Foundation's geographic definition of the Central Valley (<https://www.fresnorefoundation.org/communitiesweserve/overview.html>) and has been adopted by various organizations studying some of the major planning and land use issues (<https://civicwell.org/wp-content/uploads/2022/01/Central-Valley-Regional-Profile.pdf>).

Although it may be reasonably assumed that the six core counties will see the bulk of the economic impacts and job creation, the tables in this study show that the economic impacts extend to

the entire state since the purchases related to the Measure will be conducted in California to the maximum extent possible. It is important to note that the region is the most productive agricultural region in the nation and the world, and the economic impacts extend to all areas of the state in terms of such things as value-added activities (for example, in processing, packaging, warehousing, transportation, distribution, wholesaling and retailing, and attendant investment and output in each activity). The area outputs also extend outside of the State, for example, the State of Hawaii is highly dependent on Central California for its food supply.

The IMPLAN software has provided the following regional statistics for the Central San Joaquin Valley Region. This data is also consistent with the most recent data provided by the U.S. Bureau of Census.

Exhibit on Next Page

Exhibit 2 – IMPLAN Regional Statistics
Fresno County

Land Area:	5,963
Total Population:	1,024,125
Total Personal Income:	67,034,943,368
Total Households:	332,847
Gross Regional Product:	64,817,380,998
Total Employed:	580,140

Central San Joaquin Valley Region (without Fresno County)

Land Area:	11,732
Total Population:	1,117,713
Total Personal Income:	63,803,862,912
Total Households:	341,239
Gross Regional Product:	58,659,073,120
Total Employed:	531,794

California (without Fresno County and the Central San Joaquin Valley Region)

Land Area:	138,278
Total Population:	37,289,425
Total Personal Income:	3,401,776,918,665
Total Households:	13,130,631
Gross Regional Product:	3,939,496,968,912
Total Employed:	24,698,357

Combined Study Area

Land Area:	155,973
Total Population:	39,431,263
Total Personal Income:	3,532,615,724,945
Total Households:	13,804,717
Gross Regional Product:	4,062,973,423,030
Total Employed:	25,810,291

B. Fresno County Economic Conditions⁹

Fresno County serves as the economic center of California's San Joaquin/Central California region which is the most productive agricultural and food processing region in the State and the nation, and is developing into an important warehouse, logistics and transportation hub both regionally and in the western United States. The County's strategic location in terms of the movement of goods and services is already supported by major transportation corridors, including State Route 99 and connections to Interstate 5, and is being further enhanced by the multi-billion-dollar high speed rail project whose routing is directly through Fresno County and Central California and connects northern, central, and southern California. Fresno County has an estimated population of 1,035,456 residents in 2025, is among the largest counties in California, and continues to experience population growth despite slower growth trends in many other regions of the state.

Fresno County's economy is supported by more than 19,000 employer establishments that provide employment for approximately 301,700 workers and generates over \$16.7 billion in annual payroll.¹⁰ Major industries include agriculture, food processing, healthcare, transportation and warehousing, retail trade, construction, education, and government services. The transportation and warehousing sector generated approximately \$3.5 billion in annual revenues, reflecting the County's importance as a regional distribution and logistics center.

The County has also experienced growth trends in healthcare and social assistance activities generating nearly \$9.5 billion in annual revenues which makes these sectors drivers of economic activity and also reflective of several economic and social challenges. The County's median household income of \$74,201 remains below levels found in many California metropolitan regions. Approximately 18.2 percent of residents live below the federal poverty level. Only 24.3 percent of adults hold a bachelor's degree or higher. U.S. Bureau of Labor Statistics indicate that the Fresno Metropolitan Statistical Area continues to experience unemployment rates significantly above national averages with the April 2026 Fresno region reporting an unemployment rate of approximately 8.1 percent. Average wages in the Fresno metropolitan area have also historically remained below the national average.¹¹

Despite these challenges, Fresno County is seen as being fueled by it providing better housing availability and costs and opportunities for business investment in a lower expense environment when compared to the other population centers in the State. In economic terms, one of the major inhibitors to economic diversification and enhanced wage growth at the regional and community level is the lack of capital investment in infrastructure.

C. Economic Benefits of Capital Investments in Transportation Improvements

The proposed transportation improvements sales tax Measure would provide an important source of long-term capital to address infrastructure, public facility, transportation, utility, and community development needs throughout Fresno County. Infrastructure investment is widely recognized

⁹ U.S. Census Bureau QuickFacts – Fresno County, California

¹⁰ U.S. Bureau of Labor Statistics – Fresno Economy at a Glance

¹¹ U.S. Bureau of Labor Statistics – Occupational Employment and Wages in Fresno

as a catalyst for economic growth because it creates both immediate construction-related employment and long-term productivity benefits that support private-sector investment and business expansion.

Projects developed in the course of the application of this capital investment would generate direct construction employment, professional services employment, supplier purchases, and induced spending throughout the local economy. These expenditures would support local contractors, engineers, architects, material suppliers, equipment providers, and service businesses. Given Fresno County's unemployment rate and available workforce, capital investment can provide meaningful opportunities for job creation and workforce participation.

Over the longer term, transportation-related improvements can reduce transportation costs, improve mobility, increase public safety, enhance utility reliability, expand economic development opportunities, and improve the efficiency of goods movement throughout the region. Investments in roads, streets and other transit facilities can assist in the development and maintenance of various other essential infrastructure elements, including water systems, wastewater systems, broadband connectivity, public safety, health care delivery, housing and commercial development, and entertainment and community amenities, among others. Roads and streets in good condition increase the attractiveness of Fresno County for business investment and promote positive perceptions about the quality of life.

Fresno County's growing population, relatively young workforce, and expanding housing demand place associated pressure on existing infrastructure systems. U.S. Census Bureau data indicate that Fresno County added more than 26,000 residents between 2020 and 2025 and issued more than 2,200 building permits in 2025 alone. Ongoing investment in transportation networks is an essential part of the overall infrastructure of Fresno County, and the failure to make these investments would create capacity constraints that limit economic growth and reduce the quality of life for residents and businesses.

Capital investment in transportation improvements can also help address persistent economic disparities by improving access to employment centers, supporting workforce development initiatives, encouraging private-sector investment in underserved areas, and creating construction and permanent employment opportunities. Such investments can strengthen Fresno County's competitive position within California, improve economic resilience, and support long-term increases in income, employment, and business activity.

Given Fresno County's role as the economic hub of the Central Valley, strategic infrastructure investment has the potential to generate benefits extending beyond the County itself by supporting regional commerce, agricultural production, freight movement, business and public services and facilities, housing, intergovernmental planning, and population growth throughout the broader Central California region. As important, the economic benefits of capital investment in transportation improvements over the 30-year period of revenue generation and project spending will be on-going and sustained well beyond the initial construction period and will impact the lives of current and future generations.

D. Industries Impacted and Associated Multipliers

One of the most salient aspects of understanding the regional economy relates to the composition of industries contained within the region and how investments in the economy affect local

area businesses. The following table, taken directly from IMPLAN, shows the top employment multipliers (excluding public sector employers) for the region.¹²

Table 4 Key Employment Multipliers				
IMPLAN Sector	Description	Direct Multiplier	Indirect Multiplier	Induced Multiplier
436	Lessors of nonfinancial intangible assets	16.012913	15.012913	2.716186
64	Soybean and other oilseed processing	13.176064	12.176064	3.475837
146	Petroleum refineries	6.415206	5.415206	3.047262
80	Creamery butter manufacturing	5.202218	4.202218	1.366168
416	Wireless telecommunications carriers (except satellite)	5.164673	4.164673	1.136821
159	Nitrogenous fertilizer manufacturing	4.168593	3.168593	1.469618
420	Internet publishing and broadcasting and web search portals	3.901621	2.901621	0.829096
2	Grain farming	3.856134	2.856134	0.966403
155	Other basic organic chemical manufacturing	3.650373	2.650373	0.800815
149	Petroleum lubricating oil and grease manufacturing	3.597313	2.597313	1.004145
13	Poultry and egg production	3.576147	2.576147	0.897722
324	Automobile and light duty motor vehicle manufacturing	3.550657	2.550657	1.027338
152	Industrial gas manufacturing	3.510201	2.510201	0.917997
60	Flour milling	3.458814	2.458814	0.928223
398	Water transportation	3.443502	2.443502	0.590898
414	Cable and other subscription programming	3.251872	2.251872	0.910995
377	Wholesale - Household appliances and electrical and electronic goods	3.188717	2.188717	0.71033
59	Other animal food manufacturing	3.032185	2.032185	0.819649
148	Asphalt shingle and coating materials manufacturing	2.685277	1.685277	0.982142
86	Rendering and meat byproduct processing	2.624782	1.624782	0.741226

The following table provides data which differentiates Fresno County from the rest of the State. It is informative in terms of demonstrating the need for the Measure in terms of promoting improvement and growth in several key social and economic dynamics affecting the regional economy.

¹² For employment multipliers, each direct job created by the project would create X number of jobs in the indicated industry.

Table 5 Selected Data for Fresno County		
	County of Fresno ¹³	State of California ¹⁴
Population	1,035,456	39,431,263
Growth Rate (2020-2025)	2.7%	-0.8%
Under 18	27.2%	21.3%
Hispanic ¹⁵	55.3%	40.8%
Asian	12.4%	17.0%
American Indian ¹⁶	3.2%	1.8%
Veterans	3.2%	3.3%
Land Area in Sq Miles	5,963	155,973
Population/Sq Mile	169.3	252.8
Housing Units/Population Median Value	353,491/\$388,800	14,995,410/\$734,700
Owner Occupied	55.5%	55.9%
Owner Cost/w Mortgage	\$2,065	\$2,946
Median Mo. Gros Rent	\$1,392	2,036
Building permits	2,271	103,856
Households	324,702	13,548,091
Persons/Household	3.07	2.84
Median Household Income	\$74,201	\$99,122
H.S. Grad., % >25 yrs. Old	79.1%	84.7%
Bachelor's, % >25 yrs. Old	24.3%	37.1%
% Persons in Poverty ¹⁷	18.2%	11.8%
Per Capita Income	\$32,963	\$49,513
Total Employer Establishments (2023)	19,144	1,029,689
Employment Growth	2.7%	2.3%
Unemployment % ^{18,19}	8.1%	5.4%

Salient factors indicating a generalized need for the Measure:

- Regional population is growing even in the face of a decline in the State's population
- There is a higher percentage of pre-college-age persons versus the State
- There is a higher percentage of persons from minority groups
- 47.8% of the Central San Joaquin Valley Region population is in Fresno County

¹³ <https://www.census.gov/quickfacts/fact/table/CA/PST045224> Version 1 data.

¹⁴ <https://www.census.gov/quickfacts/fact/table/CA/PST045224> Version 1 data.

¹⁵ Includes Latino

¹⁶ Include Alaska Native

¹⁷ [https://www.labormarketinfo.edd.ca.gov/file/lfmonth/frsn\\$pbs.pdf](https://www.labormarketinfo.edd.ca.gov/file/lfmonth/frsn$pbs.pdf)

¹⁸ [https://labormarketinfo.edd.ca.gov/file/lfmonth/frsn\\$pbs.pdf](https://labormarketinfo.edd.ca.gov/file/lfmonth/frsn$pbs.pdf)

¹⁹ https://edd.ca.gov/en/about_edd/news_releases_and_announcements/unemployment-january-2026/

- The population density, generally, is rural, but the Fresno metropolitan area is becoming more suburban
- There is a shortage of housing units
- Construction per capita is outpacing State construction
- Housing costs have increased more recently, but are still lower than State-wide costs
- Household size is about 9% larger than the State's household size
- Median household incomes are 25.1% lower than the State median household income
- Per capita income is 33.4% lower than the State per capita income
- The poverty rate is more than 1.5x that of the State rate
- High school graduation rates are, in proportion to the population, 5.6% lower vs. State
- College graduates are, in proportion to the population, 34.5% fewer vs. State
- Small business firms are fewer in proportion to population vs. the State
- The unemployment rate is more than 1.5 times greater than the State's

8. Understanding the Measure:

The following is taken directly from the full text of the FCTIA Measure.

Through the Measure, it is the intent of the people of the County of Fresno in enacting this Act to do all of the following:

- a) Fix what matters most by repairing and maintaining existing local streets and roads first.
- b) Keep people and our kids safe by investing in safety improvements, including enhanced lighting, road safety, and safe routes to school.
- c) Get people where they need to go efficiently by improving the accessibility and affordability of public transit systems that connect the public to essential services and amenities.
- d) Improve transportation alternatives by building and maintaining bikeways, pedestrian facilities, and public transit options.
- e) Keep the transportation system safe with repairs, retrofits, and safety upgrades, allowing students, seniors, and people with disabilities to travel safely.
- f) Allow seniors, students, people with disabilities, veterans, and active military personnel to access public transit at no cost.
- g) Create thousands of local quality jobs that pay a living wage and provide healthcare and retirement benefits for workers.
- h) Build strong, vibrant communities by adding shade, trees, and other features to combat heat, beautify transportation corridors, and ensure no neighborhood is left behind.
- i) Foster innovation by making smart investments that keep our county competitive and connected — now and in the future.

- j) Reduce air pollution to protect Fresno County's environment and quality of life.
- k) Protect taxpayers with strict accountability measures, including independent audits and citizens' oversight, to ensure funds are spent as intended by voters.

The areas of improvement will be within the boundaries of Fresno County. Revenue from the tax will be distributed to the cities inside of Fresno County as well as the unincorporated portions of the County. The cities which will receive funds are: Clovis, Coalinga, Firebaugh, Fowler, Fresno, Huron, Kerman, Kingsburg, Mendota, Orange Cove, Parlier, Reedley, San Joaquin, Sanger, and Selma.

A Citizen's Oversight Committee will be formed to ensure the revenue raised through the ordinance is used for the specified purposes. The Citizens Oversight Committee will be formed within six months following the effective date of the Act. The committee will consist of 11 members and be responsible for the following:

1. Receiving, reviewing, and recommending action on independent financial and performance audits.
2. Receiving, reviewing, and recommending action on reports, studies, and plans directly related to programs, revenues, or expenditures.
3. Reviewing and commenting on expenditures for consistency with this Act.
4. Annually reviewing sales-tax expenditures and publicizing findings.
5. Presenting recommendations and findings in a formal annual public report.
6. Conducting the comprehensive review of the Act, at a minimum, every ten years pursuant to section 4.60.170.
7. Referring any misuse of revenue to the Fresno County District Attorney, the Attorney General, and any other appropriate agency.

9. IMPLAN and North American Industry Classification Sectors:

There are multiple IMPLAN/North American Industry Classification Sectors (NAICS) primarily affected by the Measure.

- 237310 (Highway, Street, and Bridge Construction)
 - This industry comprises establishments primarily engaged in the construction of highways (including elevated), streets, roads, airport runways, public sidewalks, or bridges. The work performed may include new work, reconstruction, rehabilitation, and repairs. Specialty trade contractors are included in this industry if they are engaged in activities primarily related to highway, street, and bridge construction (e.g., installing guardrails on highways).
 - This NAICS code was used for the following programs:
 - Neighborhood Streets and Roads Repair and Maintenance Program
 - The funds will be used to improve roads, make repairs, and improve transportation in Fresno County.
 - Access and Innovation Programs
 - The funds will be used for improving innovation and access points.

- Regional Connectivity Program
 - The funds will be used to improve connectivity between the airport and the surrounding areas as well as improve the overall infrastructure.
- 485113 (Bus and Other Motor Vehicle Transit Systems)
 - This U.S. industry comprises establishments primarily engaged in operating local and suburban passenger transportation systems using buses or other motor vehicles over regular routes and on regular schedules within a metropolitan area and its adjacent nonurban areas.
 - This NAICS code was used for the following programs:
 - Public Transportation Program
 - The funds will be used to expand bus routes, support carpools and vanpools, and the Senior Scrip program.
- 541611 (Administrative Management and General Management Consulting Services)
 - This U.S. industry comprises establishments primarily engaged in providing operating advice and assistance to businesses and other organizations on administrative management issues, such as financial planning and budgeting, equity and asset management, records management, office planning, strategic and organizational planning, site selection, new business start-up, and business process improvement. This industry also includes establishments of general management consultants that provide a full range of administrative, human resource, marketing, process, physical distribution, logistics, or other management consulting services to clients.
 - This NAICS code was used for the following program:
 - Administration, Performance Measures, Requirements, and Indicators Program
 - The funds will be used to administer the program and provide oversight.

10. Key Economic and Business Assumptions:

The following are a list of key economic and business assumptions used in the creation of this economic impact study.

- The analysis evaluates the economic impacts associated with the proposed continuation of a half-cent sales tax dedicated to transportation investments over a 30-year period.
- FCTIA Measure revenues were projected using Fresno COG's estimated annual growth rate of 4.0 percent.
- The 4.0 percent annual growth assumption was evaluated against historical economic data and was found to be consistent with long-term Fresno County taxable sales trends and the historical performance of comparable countywide sales tax measures.
- FCTIA Measure revenues were allocated among program categories based on the expenditure plan contained within the proposed measure and supporting information provided by Fresno COG.
- All revenues were assumed to be expended in the year after they were collected.
- IMPLAN industry sectors were assigned based on the predominant economic activity associated with each Measure program category.
- As called for in the Measure, 1.0 percent will be allocated directly to the Fresno Yosemite International Airport for infrastructure and access improvement projects.

- All economic impacts are reported as the cumulative effects occurring within Fresno County over the 30-year analysis period.

11. Economic Inputs for IMPLAN:

Table 5 represents the revenues of the FCTIA Measure for the five periods based on anticipated distributions:

Period	Period 1 FY2029 – FY2033	Period 2 FY2034 – FY2038	Period 3 FY2039 – FY2043	Period 4 FY2044 – FY2048	Period 5 FY2049 – FY2053	Period 6 FY2054 – FY2058	Totals
Tax Revenues	\$714,510,475	\$869,311,243	\$1,057,650,047	\$1,286,793,000	\$1,565,580,438	\$1,904,767,984	\$7,398,613,187
Roads Repair and Maintenance Program	\$464,431,809	\$565,052,308	\$687,472,531	\$836,415,450	\$1,017,627,285	\$1,238,099,189	\$4,809,098,572
Public Transportation Program	\$178,627,619	\$217,327,811	\$264,412,512	\$321,698,250	\$391,395,109	\$476,191,996	\$1,849,653,297
Access and Innovation Program	\$28,580,419	\$34,772,450	\$42,306,002	\$51,471,720	\$62,623,218	\$76,190,719	\$295,944,527
Regional Connectivity	\$35,725,524	\$43,465,562	\$52,882,502	\$64,339,650	\$78,279,022	\$95,238,399	\$369,930,659
Administration	\$7,145,105	\$8,693,112	\$10,576,500	\$12,867,930	\$15,655,804	\$19,047,680	\$ 73,986,132

12. Job Creation Estimates:

- The following summarize the key methodological protocols, and the data inputs previously described herein:
 - Core Documents.** This economic impact study was conducted using the IMPLAN methodology and references from various documents related to the FCTIA Measure and the IMPLAN User's Manual.²⁰
 - Database.** In addition, the most recent IMPLAN data was used for this study (purchased 2026) and has been certified by The IMPLAN Group, LLC as the most recent.
 - Region.** The study area includes the state of California.
 - Inputs.** To calculate the economic impact created, the following cash flows were analyzed.

²⁰ www.IMPLAN.com

a. Neighborhood Streets and Roads Repair and Maintenance Program

Based on information provided at the time of the creation of this study and as specified in the ballot measure submitted to the County of Fresno, it is assumed that each year 65% of the tax revenue will be spent on the construction, repair, and maintenance activities related to both existing and new roads, streets, systems, and facilities.

b. Public Transportation Program

Based on information provided at the time of the creation of this study and as specified in the ballot measure submitted to the County of Fresno, it is assumed that each year 25% of the tax revenue will be spent on public transportation programs.

c. Access and Innovation Program

Based on information provided at the time of the creation of this study and as specified in the ballot measure submitted to the County of Fresno, it is assumed that each year 4% of the tax revenue will be spent on expanding access and innovation programs.

d. Regional Connectivity Program

Based on information provided at the time of the creation of this study and as specified in the ballot measure submitted to the County of Fresno, it is assumed that each year 5% of the tax revenue will be spent on regional connectivity programs.

e. Administration, Performance Measures, Requirements, and Indicators Program

Based on information provided at the time of the creation of this study and as specified in the ballot measure submitted to the County of Fresno, it is assumed that each year 1% of the tax revenue will be spent on the administration and requirement of the program.

Table 7 represents key data inputs to the IMPLAN model to determine the overall economic impact to the region from the FCTIA Measure.

Table 7
IMPLAN Economic Inputs

Period	Period 1 FY2029 – FY2033	Period 2 FY2034 – FY2038	Period 3 FY2039 – FY2043	Period 4 FY2044 – FY2048	Period 5 FY2049 – FY2053	Period 6 FY2054 – FY2058
Roads Repair and Maintenance Program	\$464,431,809	\$565,052,308	\$687,472,531	\$836,415,450	\$1,017,627,285	\$1,238,099,189
Public Transportation Program	\$178,627,619	\$217,327,811	\$264,412,512	\$321,698,250	\$391,395,109	\$476,191,996
Access and Innovation Program	\$28,580,419	\$34,772,450	\$42,306,002	\$51,471,720	\$62,623,218	\$76,190,719
Regional Connectivity	\$35,725,524	\$43,465,562	\$52,882,502	\$64,339,650	\$78,279,022	\$95,238,399
Administration	\$7,145,105	\$8,693,112	\$10,576,500	\$12,867,930	\$15,655,804	\$19,047,680

Table 8 below reflects the number of jobs created by the FCTIA Measure in the five periods.

Table 8
Jobs Created from the FCTIA Measure

Period	Period 1 FY2029 – FY2033	Period 2 FY2034 – FY2038	Period 3 FY2039 – FY2043	Period 4 FY2044 – FY2048	Period 5 FY2049 – FY2053	Period 6 FY2054 – FY2058	Totals
Direct	3,867.77	4,705.74	5,725.25	6,965.64	8,474.77	10,310.85	40,050.02
Indirect	1,242.95	1,512.45	1,840.32	2,239.25	2,724.64	3,315.20	12,874.82
Induced	1,473.99	1,793.46	2,182.13	2,655.01	3,230.38	3,930.40	15,265.37
Total	6,584.72	8,011.65	9,747.70	11,859.90	14,429.78	17,556.46	68,190.21

13. Findings Relating to the Regional Economic Impact Analysis of the Measure:

Terms and Definitions Used in the Tables

Direct Effects – The set of expenditures applied to the I-O multipliers for impact analysis. It is one or more production changes or expenditures made by producers/consumers as a result of an activity or policy. Direct effects can be positive or negative.²¹

²¹ <https://support.implan.com/hc/en-us/articles/115009668548-Direct-Effects>

Indirect Effects – Economic Effects stemming from business-to-business purchases in the supply chain.²²

Induced Effects – Economic Effects stemming from household spending of Labor Income, after removal of taxes, savings, and commuter income.²³

Labor Income – Labor Income changes examine how changes in Employee Compensation or Proprietor Income will affect the economy. They are especially useful in general cases, when the Industry in which the compensation change is taking place is unknown, or when a range of Industries are affected by the change, but the value of the change for each Industry Sector is unknown.²⁴

Employee Compensation – Employee compensation is the total payroll costs (including benefits) of each industry in the region. It includes the wages and salaries of workers who are paid by employers, as well as benefits such as health and life insurance, retirement payments, and non-cash compensation. Employee compensation is derived for each industry from ES202 and REIS data.²⁵

Proprietary Income – Proprietary income consists of payments received by self-employed individuals as income. Any income received for payment of self-employed work, as reported on Federal tax forms, is counted here. This includes income received by private business owners, doctors, lawyers, and so forth.²⁶

Other Property Type Income – Other property type income consists of payments for rents, royalties, and dividends. Payments to individuals in the form of rents received on property, royalties from contracts, and dividends paid by corporations are included here as well as corporate profits earned by corporations. Other property type income numbers are derived from U.S. Bureau of Economic Analysis Gross State Product data.²⁷

Indirect Business Taxes – Indirect business taxes consist of excise taxes, property taxes, fees, licenses, and sales taxes paid by businesses. These taxes occur during the normal operation of businesses but do not include taxes on profit or income. Indirect business tax numbers are derived from U.S. Bureau of Economic Analysis Gross State Product data.²⁸

Total Value Added – The Total Value Added report gives the value added to intermediate goods and services. It is equal to employee compensation plus proprietor income plus other property income plus indirect business taxes.²⁹

Total Output – Output represents the value of industry production. Output includes the total production of an industry or project.

Tax Impact – The Tax Impact report describes taxes related to the chosen impact analysis. These estimates are based strictly on the same data underlying the region SAM data (SAM is a set of regional economic accounts, which describe transfers between institutions, as well as, value added components). These values are based on the average for all industries within the model; the average taxes associated with each household income class; the average taxes and transfers associated with each of the government institutions defined by the model.³⁰

²² <https://support.implan.com/hc/en-us/articles/115009499547-Indirect-Effects>

²³ <https://support.implan.com/hc/en-us/articles/115009668568-Induced-Effects>

²⁴ <https://support.implan.com/hc/en-us/articles/115009668468-Labor-Income>

²⁵ <https://support.implan.com/hc/en-us/articles/115009506047-Elements-of-IMPLAN-SAM-Tables>

²⁶ <https://support.implan.com/hc/en-us/articles/115009506047-Elements-of-IMPLAN-SAM-Tables>

²⁷ <https://support.implan.com/hc/en-us/articles/115009506047-Elements-of-IMPLAN-SAM-Tables>

²⁸ <https://support.implan.com/hc/en-us/articles/115009506047-Elements-of-IMPLAN-SAM-Tables>

²⁹ <https://support.implan.com/hc/en-us/articles/115009498847-Value-Added>

³⁰ <https://support.implan.com/hc/en-us/articles/115009679588-Tax-Impact-Report>

1. Labor Income and Employee Compensation Produced

Table 9 below identifies the direct, indirect, and induced labor income generated. The total column represents the total labor income generated for the 30-year period, for a total of **\$5,060,443,076**.

Table 9 Labor Income – FCTIA Measure							
Period	Period 1 FY2029 – FY2033	Period 2 FY2034 – FY2038	Period 3 FY2039 – FY2043	Period 4 FY2044 – FY2048	Period 5 FY2049 – FY2053	Period 6 FY2054 – FY2058	Totals
Direct	306,910,618	373,403,694	454,302,689	552,728,685	672,478,958	818,173,477	3,177,998,121
Indirect	91,901,823	111,832,390	136,079,171	165,579,610	201,475,627	245,149,558	952,018,180
Induced	89,837,309	109,309,672	133,000,202	161,823,544	196,893,539	239,562,509	930,426,776
Totals	488,649,751	594,545,757	723,382,061	880,131,839	1,070,848,125	1,302,885,544	5,060,443,076

Table 10 below identifies the employee compensation generated for the 30-year period, which is a total of **\$3,532,568,624**.

Table 10 Employee Compensation – FCTIA Measure							
Period	Period 1 FY2029 – FY2033	Period 2 FY2034 – FY2038	Period 3 FY2039 – FY2043	Period 4 FY2044 – FY2048	Period 5 FY2049 – FY2053	Period 6 FY2054 – FY2058	Totals
Direct	184,265,569	224,187,240	272,758,056	331,851,880	403,748,553	491,221,849	1,908,033,148
Indirect	78,322,021	95,307,385	115,970,826	141,112,226	171,704,272	208,924,612	811,341,341
Induced	78,517,887	95,536,766	116,242,328	141,433,975	172,085,212	209,377,967	813,194,135
Totals	341,105,477	415,031,391	504,971,210	614,398,081	747,538,037	909,524,428	3,532,568,624

2. Proprietor and Other Property Type Income Produced.

Table 11 below identifies income generated for proprietors in the defined region. The total for the 30-year period is **\$1,527,874,453**.

Table 11							
Proprietor Income – FCTIA Measure							
Period	Period 1 FY2029 – FY2033	Period 2 FY2034 – FY2038	Period 3 FY2039 – FY2043	Period 4 FY2044 – FY2048	Period 5 FY2049 – FY2053	Period 6 FY2054 – FY2058	Totals
Direct	122,645,049	149,216,455	181,544,633	220,876,804	268,730,405	326,951,627	1,269,964,973
Indirect	13,579,803	16,525,005	20,108,345	24,467,384	29,771,355	36,224,947	140,676,839
Induced	11,319,422	13,772,907	16,757,874	20,389,569	24,808,328	30,184,541	117,232,641
Totals	147,544,274	179,514,367	218,410,851	265,733,758	323,310,088	393,361,115	1,527,874,453

Table 12 below indicates the economic impacts relating to property type income for the measure for the 30-year period. This totals **\$2,125,605,171**.

Table 12							
Other Property Type Income – FCTIA Measure							
Period	Period 1 FY2029 – FY2033	Period 2 FY2034 – FY2038	Period 3 FY2039 – FY2043	Period 4 FY2044 – FY2048	Period 5 FY2049 – FY2053	Period 6 FY2054 – FY2058	Totals
Direct	82,495,989	100,368,985	122,114,217	148,570,616	180,758,871	219,920,806	854,229,484
Indirect	55,826,256	67,931,269	82,658,652	100,577,127	122,380,093	148,905,059	578,278,456
Induced	66,921,871	81,427,330	99,074,997	120,546,247	146,670,790	178,455,996	693,097,230
Totals	205,244,117	249,727,584	303,847,866	369,693,990	449,809,755	547,281,860	2,125,605,171

3. Indirect Business Taxes Generated

Table 13 below identifies the indirect business tax revenues produced during the 30-year period. The total indirect business taxes generated is **\$520,635,088**.

Table 13 Indirect Business Tax – FCTIA Measure							
Period	Period 1 FY2029 – FY2033	Period 2 FY2034 – FY2038	Period 3 FY2039 – FY2043	Period 4 FY2044 – FY2048	Period 5 FY2049 – FY2053	Period 6 FY2054 – FY2058	Totals
Direct	9,674,422	11,770,413	14,320,508	17,423,087	21,197,850	25,790,425	100,176,705
Indirect	21,569,560	26,245,050	31,934,022	38,854,903	47,276,002	57,521,883	223,401,419
Induced	19,027,376	23,151,295	28,168,588	34,272,921	41,700,133	50,736,651	197,056,964
Totals	50,271,357	61,166,759	74,423,117	90,550,911	110,173,985	134,048,959	520,635,088

4. Total Value Added.

Table 14 below identifies the direct, indirect, and induced total value added during the 30-year period, for a total of **\$7,706,683,335**.

Table 14 Total Value Added – FCTIA Measure							
Period	Period 1 FY2029 – FY2033	Period 2 FY2034 – FY2038	Period 3 FY2039 – FY2043	Period 4 FY2044 – FY2048	Period 5 FY2049 – FY2053	Period 6 FY2054 – FY2058	Totals
Direct	399,081,029	485,543,093	590,737,413	718,722,388	874,435,679	1,063,884,707	4,132,404,309
Indirect	169,297,640	206,008,709	250,671,845	305,011,639	371,131,723	451,576,500	1,753,698,056
Induced	175,786,556	213,888,298	260,243,787	316,642,712	385,264,463	468,755,155	1,820,580,970
Totals	744,165,225	905,440,100	1,101,653,044	1,340,376,739	1,630,831,865	1,984,216,363	7,706,683,335

5. Total Output.

As indicated in Table 15, the total economic output for the measure during the 30-year period is **\$13,458,684,684**.

Table 15 Total Output – FCTIA Measure							
Period	Period 1 FY2029 – FY2033	Period 2 FY2034 – FY2038	Period 3 FY2039 – FY2043	Period 4 FY2044 – FY2048	Period 5 FY2049 – FY2053	Period 6 FY2054 – FY2058	Totals
Direct	714,510,475	869,311,243	1,057,650,047	1,286,793,000	1,565,580,438	1,904,767,984	7,398,613,187
Indirect	305,912,288	372,260,470	452,977,269	551,184,144	670,684,520	816,072,464	3,169,091,155
Induced	279,140,306	339,643,384	413,252,948	502,810,815	611,777,616	744,355,273	2,890,980,342
Totals	1,299,563,070	1,581,215,097	1,923,880,265	2,340,787,959	2,848,042,574	3,465,195,721	13,458,684,684

6. Federal, State, and County Tax Impacts, All Tax Categories.

Following is a summary of the Federal, State, and County tax impacts specified by social security, personal, business, and corporate tax generated for the Measure project for the 30-year period.

Tax Impact for the FCTIA Measure Tax								
Federal Tax Impact (2026 Dollars)								
Institution Receipts	Transfer Type	Description	Employee Compensation	Proprietor Income	Tax on Production and Imports	Households	Corporations	Total
11001	15014	Social Ins Tax- Employee Contribution	\$222,634,247	\$66,427,742				\$289,061,989
11001	15015	Social Ins Tax- Employer Contribution	\$198,992,157					\$198,992,157
11001	15017	Tax on Production and Imports: Excise Taxes			\$17,518,617			\$17,518,617
11001	15018	Tax on Production and Imports: Custom Duty			\$14,420,632			\$14,420,632
11001	15026	Corporate Profits Tax					\$100,383,105	\$100,383,105
11001	15027	Personal Tax: Income Tax				\$530,573,018		\$530,573,018
11001	15028	Personal Tax: Estate and Gift Tax						\$0
11001	99999	Total Federal Tax	\$421,626,404	\$66,427,742	\$31,939,249	\$530,573,018	\$100,383,105	\$1,150,949,519
State Tax Impacts (2026 Dollars)								
			5001	6001	8001		13001	
Institution Receipts	Transfer Type	Description	Employee Compensation	Proprietor Income	Tax on Production and Imports	Households	Corporations	Total
12001	15014	Social Ins Tax- Employee Contribution	\$10,389,442					\$10,389,442
12001	15015	Social Ins Tax- Employer Contribution	\$8,988,173					\$8,988,173
12001	15020	Tax on Production and Imports: Sales Tax			\$187,753,240			\$187,753,240
12001	15021	Tax on Production and Imports: Property Tax			\$7,957,427			\$7,957,427
12001	15022	Tax on Production and Imports: Motor Vehicle Lic			\$6,881,656			\$6,881,656
12001	15023	Tax on Production and Imports: Severance Tax			\$271,729			\$271,729
12001	15024	Tax on Production and Imports: Other Taxes			\$28,371,402			\$28,371,402
12001	15025	Tax on Production and Imports: S/L NonTaxes			\$0			\$0
12001	15026	Corporate Profits Tax					\$60,131,873	\$60,131,873
12001	15027	Personal Tax: Income Tax				\$161,681,356.42		\$161,681,356
12001	15030	Personal Tax: Motor Vehicle License				\$5,508,164.84		\$5,508,165
12001	15031	Personal Tax: Property Taxes				\$117,262.31		\$117,262
12001	15032	Personal Tax: Other Tax (Fish/Hunt)				\$733,836.10		\$733,836
12001	99999	Total State and Local Tax	\$19,377,615		\$231,235,455	\$168,040,620	\$60,131,873	\$478,785,562
County Tax Impacts (2026 Dollars)								
			5001	6001	8001		13001	
Institution Receipts	Transfer Type	Description	Employee Compensation	Proprietor Income	Tax on Production and Imports	Households	Corporations	Total
12001	15014	Social Ins Tax- Employee Contribution						\$0
12001	15015	Social Ins Tax- Employer Contribution						\$0
12001	15020	Tax on Production and Imports: Sales Tax			\$8,701,846			\$8,701,846
12001	15021	Tax on Production and Imports: Property Tax			\$46,253,505			\$46,253,505
12001	15022	Tax on Production and Imports: Motor Vehicle Lic			\$0			\$0
12001	15023	Tax on Production and Imports: Severance Tax			\$0			\$0
12001	15024	Tax on Production and Imports: Other Taxes			\$5,833,408			\$5,833,408
12001	15025	Tax on Production and Imports: S/L NonTaxes			\$276,943			\$276,943
12001	15026	Corporate Profits Tax						\$0
12001	15027	Personal Tax: Income Tax						\$0
12001	15030	Personal Tax: Motor Vehicle License						\$0
12001	15031	Personal Tax: Property Taxes				\$674,060		\$674,060
12001	15032	Personal Tax: Other Tax (Fish/Hunt)						\$0
12001	99999	Total State and Local Tax	\$0		\$61,065,702	\$674,060	\$0	\$61,739,762

The total Federal Tax impacts are as follows:

Table 17 Federal Tax Impacts	
Employee Compensation	\$421,626,404
Proprietor Income Taxes	\$66,427,742
Indirect Business Taxes	\$319,392,349
Households, Personal Income Taxes	\$530,573,018
Corporation Taxes	\$100,383,105
Total Federal Tax Impact	\$1,150,949,519

The total State and Local Tax impacts are as follows:

Table 18 State Tax Impacts	
Employee Compensation	\$19,377,615
Proprietor Income Taxes	\$0
Tax on Production and Imports	\$231,235,455
Household Taxes	\$168,040,620
Corporation Taxes	\$60,131,873
Total State Tax Impact	\$478,785,562

The total County Tax impacts for are as follows:

Table 19 County Tax Impacts	
Employee Compensation	\$0
Proprietor Income Taxes	\$0
Tax on Production and Imports	\$61,605,702
Household Taxes	\$674,060
Corporation Taxes	\$0
County Tax Impact	\$61,739,762

The total of Federal, State, and County tax impacts are: **\$1,691,474,842.**

7. Local Spending-Household Income Effect.

The total Local Spending-Household Income Effect for the measure during the 30-year period is **\$2,890,980,342.**

Economic impacts generated through household spending are reflected in the induced effects estimated by the IMPLAN model. IMPLAN utilizes Bureau of Labor Statistics Consumer Expenditure Survey data, regional purchasing patterns, and local trade-flow relationships to estimate the portion of labor income that is spent within the study area and subsequently recirculates through the local economy. Based on the estimated \$4.130 billion in labor income generated by the FCTIA Measure expenditures, household spending by employees and business proprietors is projected to exceed **\$2.89 billion** in additional economic output within Fresno County over the 30-year analysis period. These induced impacts reflect local expenditures on housing, healthcare, retail purchases, food services, transportation, entertainment, and other household goods and services, after accounting for spending leakages outside the region. The induced output generated by household spending is equivalent to approximately 70.0% of the labor income created by the project, indicating a substantial recirculation of income within the Fresno County economy.

14. Summary of Economic Impacts for the Measure:

Table 20 shown on following page summarizes the economic impacts specifically identified in each of the tables above of the IMPLAN Study for The FCTIA Measure.

Table 20		
Summary of Economic Impacts for Measure for the 30-Year Period		
	Impact – Jobs Created	
Total Jobs Created		68,190.21
	Impact- By Category-in U.S. Dollars	
Labor Income		\$5,060,443,076
Employee Compensation		\$3,532,568,624
Proprietor Income		\$1,527,874,453
Other Property Type Income		\$2,125,605,171
Indirect Business Taxes		\$520,635,088
Total Value Added		\$7,706,683,335
Total Output		\$13,458,684,684
Federal Taxes		\$1,150,949,519
State Taxes		\$478,785,562
County Taxes		\$61,739,762
Household Spending, Local Area		\$2,890,980,342

15. Professional Opinions:

Based on the operational, economic, and financial assumptions derived from all data sources, this IMPLAN analysis demonstrates that the Measure creates a substantial impact to the cities of Fresno County, Fresno County, the Central San Joaquin Valley Region, and the State of California. Clearly, the Measure has substantial economic benefit to households, businesses, and governmental institutions in the region, and creates substantial employment, income, and tax benefits.

**Appendix A: Excerpts from Item 10, Fresno COG Regional Pavement
Management Plan – Full Report, with Exhibits, 11/07/2025**

1. The Fresno Council of Governments (COG) is the state-designated public entity providing oversight for regional transportation planning. COG encompasses cities within Fresno County and the unincorporated parts of Fresno County and includes sixteen member jurisdictions. Historically, Fresno COG's sixteen-member jurisdictions have employed a variety of approaches to determine what pavement treatments to perform and where to apply them. While some jurisdictions have used pavement management programs (PMPs), others have employed more traditional approaches. Maintaining an up-to-date PMP is essential for local governments to effectively track road inventories, evaluate pavement conditions, identify maintenance and repair needs, estimate associated costs, prioritize projects, and plan budgets accordingly.

Due to limited funding, pavement maintenance and repairs have been insufficient throughout Fresno County, with small cities being particularly affected. In 2008, the Countywide average Pavement Condition Index (PCI) was 74, indicating a “good” condition. However, by 2021, it had declined to 57, placing it in the “at risk” category.

In 2025, Nichols Consulting Engineers Chtd. (NCE) assisted all sixteen member jurisdictions in implementing their PMPs using StreetSaver®, a pavement management decision-support tool developed by the Metropolitan Transportation Commission. All Fresno COG jurisdictions have access to the StreetSaver® PMP to help manage their network. It was therefore possible for Fresno COG to utilize the StreetSaver regional license and perform regional funding analyses. As part of this study, NCE aggregated the PMP databases from all sixteen member jurisdictions to perform the regional analyses. This memorandum presents a compilation of those results, focusing on the budget needs and funding analyses. These analyses illustrate the effects of various funding scenarios on pavement condition and deferred maintenance over a 10-year period. This compiled approach ensures the report can be easily referenced in the future to track regional trends. [Fresno COG Regional PMP Update.pdf](#)

2. COG's member jurisdictions maintain approximately 6,283 centerline miles of streets and roads. The majority of the countywide network (97.1%) is composed of asphalt concrete pavements. Of the remaining portion, approximately 2.7% are surface treated roads owned and managed by Fresno County, 0.2% are gravel roads, and less than 0.1% are concrete roads. The PCI is a measure of pavement condition and ranges from 0 to 100. A newly constructed road has a PCI of 100, while a failed road has a PCI of 25 or less. Pavement conditions are affected by the environment, traffic loads and volumes, construction materials, and age. The PCI for the countywide network is 64.8. This value is an area-weighted calculation. The definitions of the pavement condition categories and PCI ranges are shown in Table 2. These are the PCI “breakpoints” used in StreetSaver®.

Figure 1. Countywide Summary of Statistics

Jurisdiction	Centerline Miles	No. of Sections	Paved Area (sf)	Gravel Area (sf)	2025 PCI
Clovis	484.8	3381	85,811,364	0	71
Coalinga	50.0	299	10,940,289	9,396	58
Firebaugh	20.7	165	4,337,338	67,238	54
Fowler	37.5	260	7,883,475	0	63
Fresno (City)	1805.3	19,628	354,633,213	25,500	64
Fresno (County)	3388.7	8,266	428,481,730	431,012	66
Huron	11.1	90	2,324,152	595,034	46
Kerman	60.8	565	12,152,573	0	71
Kingsburg	46.0	319	9,379,632	0	66
Mendota	27.6	225	5,918,760	328,525	40
Orange Cove	33.4	169	6,207,592	327,486	34
Parlier	36.9	340	8,040,438	0	69
Reedley	98.6	1,150	19,528,938	43,300	51
San Joaquin	13.5	95	2,836,451	44,636	34
Sanger	87.2	586	17,694,229	36,256	67
Selma	81.4	537	16,832,112	0	60
Countywide	6,283	36,075	993,002,285	1,908,382	64.8

The current overall weighted average PCI for the network is 64.8, which places the overall street network pavement condition in the **“Fair”** category. Figure 1 shows the current pavement conditions of all jurisdictions, as well as the overall network conditions. The overall street condition assessment was calculated based on each jurisdiction’s paved area and it shows that 43.9% of the pavement network is in “Good” condition, 30.7% is in “Fair” condition, and 25.4% is in “Poor” and “Very Poor” conditions. Note that labels smaller than 10% are not shown on the chart for readability (Figure 1).

Table 1. Pavement Condition by Category

Condition Category	PCI Range	Description
Good	70 – 100	Pavements with minimal surface distress that may include some hairline longitudinal/transverse cracks and/or weathering. The pavement structure is sound, and minor oxidation may occur.
Fair	50 – 69	Pavements with significant distress that is predominantly non-load-related, such as longitudinal/transverse cracks, bleeding, block cracking, weathering, raveling, etc. The pavement structure is sound, and some oxidation has occurred.
Poor	25 – 49	Pavements with moderate to severe surface distresses. Extensive weathering or raveling, block cracking, and load-related distresses such as alligator cracking, rutting, and potholes may occur.
Very Poor	0 – 24	Pavements with severe weather-related distress and large quantities of load-related distress. These pavements are nearing the end of their service life.

Fig. 2: Pavement Condition By Jurisdiction

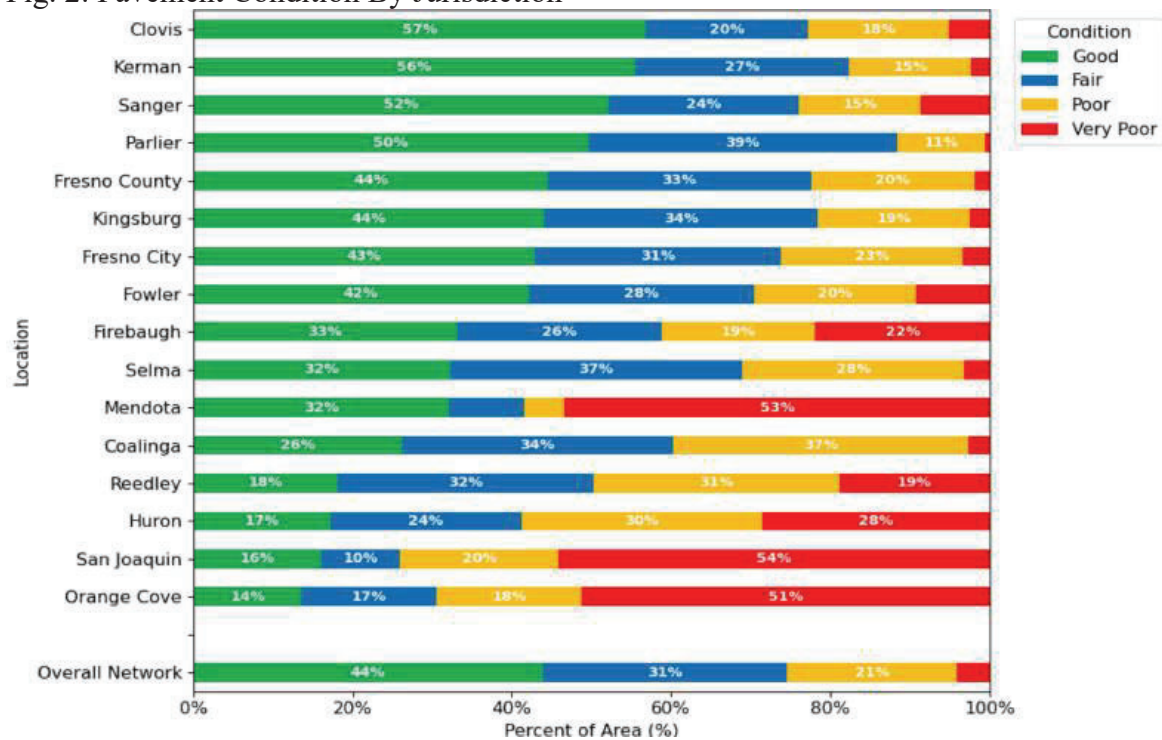


Table 2. Budgetary Needs By Jurisdiction

Jurisdiction	10-Year Budget Needs (\$M)
Clovis	431.7
Coalinga	61.6
Firebaugh	26.8
Fowler	40.0
Fresno City	1,988.3
Fresno County	2,162.9
Huron	16.9
Kerman	39.2
Kingsburg	44.2
Mendota	54.8
Orange Cove	60.5
Parlier	38.1
Reedley	158.2
San Joaquin	26.0
Sanger	108.6
Selma	103.2
Countywide	5,361.0

NCE met with individual jurisdictions to evaluate the advantages and disadvantages of various pavement treatment strategies. A customized decision tree was developed for each agency, and this was reviewed and formally approved by local agency representatives. The unit costs were estimated using bid tabs from local and neighboring jurisdictions.

3. Discussion of Revenue Sources

The Fresno COG member jurisdictions obtain pavement funding from five primary sources.

The Highway User Tax Account (HUTA) is the California State per-gallon tax on gasoline and diesel fuels. This tax has been the primary source of funding for road maintenance throughout the state for many years. However, the rise of alternative fuels, electric vehicles, and more efficient gasoline-powered vehicles has led to reduced gas consumption and is therefore projected to be a declining revenue source.

The Road Maintenance and Rehabilitation Act (RMRA or SB1), passed in 2017, created a new state revenue source funded by an additional per gallon gas tax as well as a new vehicle-registration tax. This funding source is expected to provide Fresno COG member jurisdictions with more than \$49 million per year for road maintenance. As with HUTA, it is expected to be a declining revenue source.

Measure C is a half-cent sales tax passed by Fresno County voters in 1986. This source of revenue provided approximately \$1 billion during the first 20 years (Measure C I) for road and street maintenance and construction, and \$1.4 billion during the reauthorization period from 2007 to 2026 (Measure C II) for multimodal transportation improvements. The current measure (Measure C II) was extended in 2006 and will be sunset in 2027. A minimum of 15% of the Measure C II funding currently goes to local street and road maintenance.

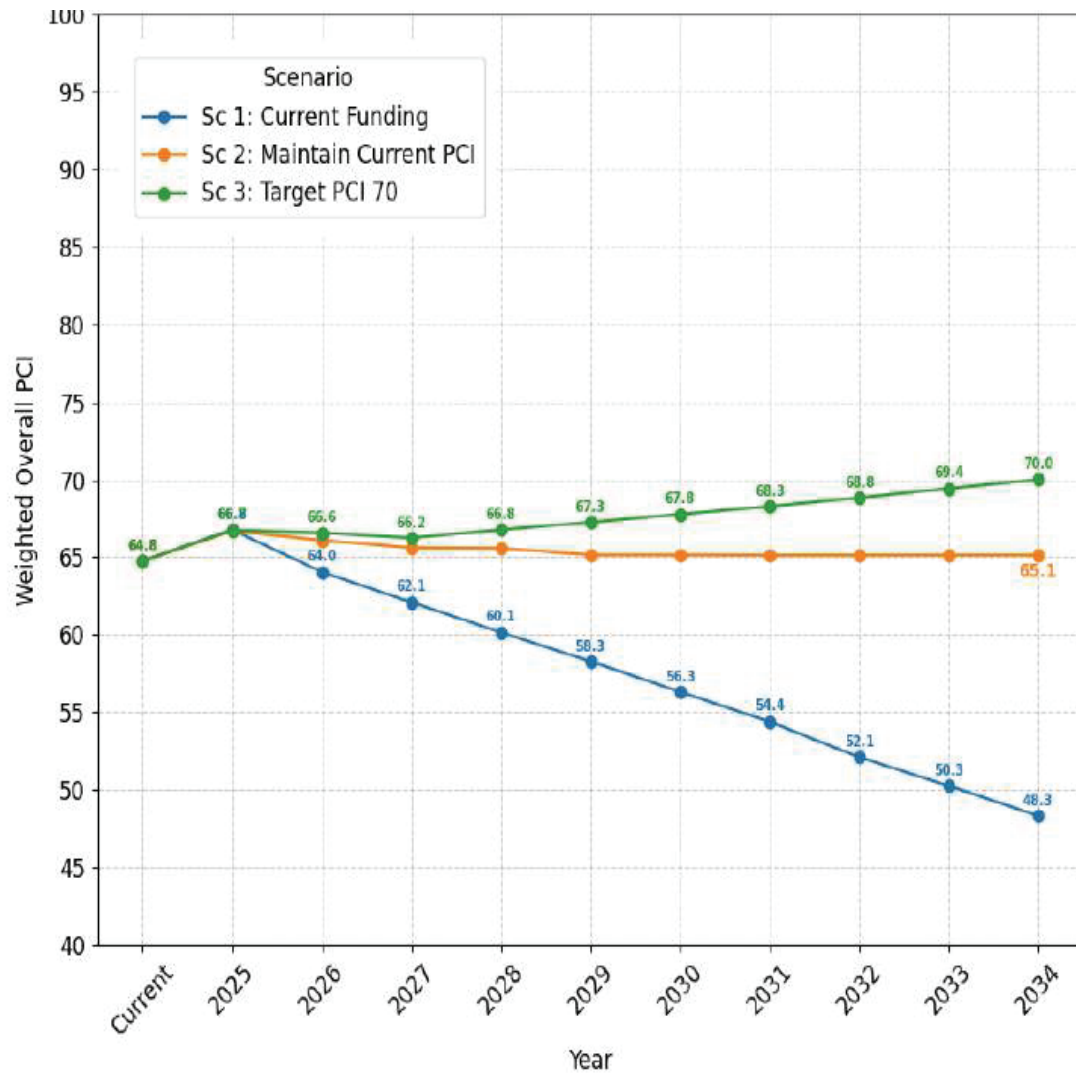
Local Transportation Fund (LTF) is a statewide 0.25 cent general sales tax. It provides transit planning and operation for public transit operators. Local governments receive LTF funds for street and road improvements when there are no unmet transit needs that are deemed reasonable to meet in the areas.

Surface Transportation Block Grant (STBG) is a federal funding source that provides flexible funds for states and local jurisdictions. The STBG can be used to fund a variety of projects including highways, bridges, public roads, pedestrian and bicycle infrastructure, and transit. Because of its flexibility, STBG has served different purposes over time. Due to the high roadway maintenance needs in the Fresno region in recent years, local jurisdictions in Fresno region have chosen to focus on street and road maintenance with STBG funding. The Regional STBG program is competitive and the funding for each jurisdiction may vary from year to year.

4. Funding Analyses Three funding scenarios were selected for analysis to determine the impact of current funding on the countywide condition of streets and roads and on the deferred maintenance (the maintenance and rehabilitation pavement treatments not performed due to insufficient funding) and to determine the funding needed to maintain or improve the current condition of the countywide network. Scenario 1: Current funding levels; Scenario 2: Funding required to maintain the current PCI; Scenario 3: Funding required to improve the current pavement network to PCI of 70, which is Fresno COG's goal Each funding scenario was analyzed over a 10-year period and includes inflation. The projected regional funding for each scenario

and the projected deferred maintenance are shown in Figures 3 to 8. The total 10-year funding for Scenarios 1, 2, 3 are \$436.2 million, \$3.1 billion and \$3.8 billion, respectively.

Dr. Penbera's Comment: An evident and rather large amount of funding is needed to accomplish a PCI of 70 which is just the lowest point of the Good range in Table 1 above. As indicated by Figure 10 below and excerpted from the COG Report, the gap between the current trajectory of conditions and the targeted PCI of 70 is estimated to widen such that in 7 years the PCI will have fallen into the Poor category.



**Appendix B: FRESNO COUNTY, CALIFORNIA, AND U.S. CENSUS BUREAU 2025
(Vers 2 Data)**

POPULATION		
	Fresno County, California	U.S.
Population estimates, July 1, 2025, (V2025)	1,035,456	341,784,857
Population estimates, July 1, 2024, (V2024)	1,024,125	340,110,988
Population estimates base, April 1, 2020, (V2025)	1,008,661	331,516,113
Population estimates base, April 1, 2020, (V2024)	1,008,649	331,515,736
Population, percent change - April 1, 2020 (estimates base) to July 1, 2025, (V2025)	2.70%	3.10%
Population, percent change - April 1, 2020 (estimates base) to July 1, 2024, (V2024)	1.50%	2.60%
Population, Census, April 1, 2020	1,008,654	331,449,281
Population, Census, April 1, 2010	930,450	308,745,538
Source: U.S. Census Bureau Community Survey (V2025) Estimates		

AGE & SEX		
	Fresno County, California	U.S.
Persons under 5 years, percent	6.80%	5.50%
Persons under 18 years, percent	27.20%	21.50%
Persons 65 years and over, percent	13.40%	18.00%
Female persons, percent	49.90%	50.50%
Source: U.S. Census Bureau Community Survey (V2025) Estimates		

RACE & HISPANIC ORIGIN		
	Fresno County, California	U.S.
White alone, percent	74.60%	74.80%
Black alone, percent	5.90%	13.70%
American Indian and Alaska Native alone, percent	3.20%	1.40%
Asian alone, percent	12.40%	6.70%
Native Hawaiian and Other Pacific Islander alone, percent	0.30%	0.30%
Two or More Races, percent	3.50%	3.10%
Hispanic or Latino, percent	55.30%	20.00%
White alone, not Hispanic or Latino, percent	25.80%	57.50%
Source: U.S. Census Bureau Community Survey (V2025) Estimates		

POPULATION CHARACTERISTICS		
	Fresno County, California	U.S.
Veterans, 2020-2024	32,718	16,185,883
Foreign-born persons, percent, 2020-2024	20.00%	14.10%
Source: U.S. Census Bureau Community Survey (V2025) Estimates		

HOUSING		
	Fresno County, California	U.S.
Housing Units, July 1, 2025, (V2025)	353,491	148,260,882
Owner-occupied housing unit rate, 2020-2024	55.50%	65.20%
Median value of owner-occupied housing units, 2020-2024	\$388,800	\$332,700
Median selected monthly owner costs - with a mortgage, 2020-2024	\$2,065	\$1,963
Median selected monthly owner costs - without a mortgage, 2020-2024	\$673	\$638
Median gross rent, 2020-2024	\$1,392	\$1,413
Building Permits, 2025	2,271	1,431,616
Source: U.S. Census Bureau Community Survey (V2025) Estimates		

FAMILIES & LIVING ARRANGEMENTS		
	Fresno County, California	U.S.
Households, 2020-2024	324,702	129,227,496
Persons per household, 2020-2024	3.07	2.53
Living in the same house 1 year ago, percent of persons age 1 year+ , 2020-2024	89.80%	87.70%
Language other than English spoken at home, percent of persons age 5 years+, 2020-2024	43.70%	22.30%
Source: U.S. Census Bureau Community Survey (V2025) Estimates		

COMPUTER & INTERNET USE		
	Fresno County, California	U.S.
Households with a computer, percent, 2020-2024	94.40%	95.50%
Households with a broadband Internet subscription, percent, 2020-2024	88.90%	91.00%
Source: U.S. Census Bureau Community Survey (V2025) Estimates		

EDUCATION		
	Fresno County, California	U.S.
High school graduate or higher, percent of persons age 25 years+, 2020-2024	79.10%	89.60%
Bachelor's degree or higher, percent of persons age 25 years+, 2020-2024	24.30%	35.70%
Source: U.S. Census Bureau Community Survey (V2025) Estimates		

HEALTH		
	Fresno County, California	U.S.
With a disability, under age 65 years, percent, 2020-2024	9.60%	9.30%
Persons without health insurance, under age 65 years, percent	8.30%	9.60%
Source: U.S. Census Bureau Community Survey (V2025) Estimates		

ECONOMY		
	Fresno County, California	U.S.
In civilian labor force, total, percent of population age 16 years+, 2020-2024	61.50%	63.00%
In civilian labor force, female, percent of population age 16 years+, 2020-2024	56.60%	58.80%
Total accommodation and food services sales, 2022 (\$1,000)	2,679,390	1,196,315,575
Total health care and social assistance receipts/revenue, 2022 (\$1,000)	9,473,385	3,330,304,719
Total transportation and warehousing receipts/revenue, 2022 (\$1,000)	3,453,014	1,316,303,546
Total retail sales, 2022 (\$1,000)	15,435,333	6,974,691,329
Total retail sales per capita, 2022	\$15,202	\$20,928
Source: U.S. Census Bureau Community Survey (V2025) Estimates		

TRANSPORTATION		
	Fresno County, California	U.S.
Mean travel time to work (minutes), workers age 16 years+, 2020-2024	23.5	26.4
Source: U.S. Census Bureau Community Survey (V2025) Estimates		

INCOME & POVERTY		
	Fresno County, California	U.S.
Median households income (in 2024 dollars), 2020-2024	\$74,201	\$80,734
Per capita income in past 12 months (in 2024 dollars), 2020-2024	\$32,963	\$44,673
Persons in poverty, percent	18.20%	10.60%
Source: U.S. Census Bureau Community Survey (V2025) Estimates		

BUSINESSES		
	Fresno County, California	U.S.
Total employer establishments, 2023	19,144	8,361,342
Total employment, 2023	301,731	139,831,742
Total annual payroll, 2023 (\$1,000)	16,686,744	9,556,351,319
Total employment, percent change, 2022-2023	2.70%	3.00%
Total non-employer establishments, 2023	65,587	30,427,808
All employer firms, Reference year 2023	14,464	5,934,950
Male-owned employer firms, Reference year 2023	8,655	3,638,693
Female-owned employer firms, Reference year 2023	Not Available (S)	1,356,990
Minority-owned employer firms, Reference year 2023	5,426	1,400,775
Nonminority-owned employer firms, Reference year 2023	7,317	4,202,325
Veteran-owned employer firms, Reference year 2023	514	261,330
Nonveteran-owned employer firms, Reference year 2023	12,465	5,343,976
Source: U.S. Census Bureau Community Survey (V2025) Estimates		

GEOGRAPHY		
	Fresno County, California	U.S.
Population per square mile, 2020	169.3	93.8
Population per square mile, 2010	156.2	87.4
Land area in square miles, 2020	5,958.38	3,533,038.28
Land area in square miles, 2010	5,957.99	3,531,905.43
FIPS Code	"06019"	"1"
NOTE: FIPS Code values are enclosed in quotes to ensure leading zeros remain intact.		
Source: U.S. Census Bureau Community Survey (V2025) Estimates		

End of Study

Exhibit B

P-1-11

SB 375 Regional Targets

IN THIS SECTION

CONTACT

Sustainable Communities & Climate Protection Program

Email sustainablecommunities@arb.ca.gov

Phone (800) 242-4450

Regional Targets

Senate Bill 375 requires CARB to develop and set regional targets for greenhouse gas (GHG) emission reductions from passenger vehicles. CARB must update the regional targets at least every eight years, with the option of revising them every four years.

CARB's GHG emission targets for years 2020 and 2035 are intended to help achieve significant GHG reductions from changes to land use patterns and improved transportation networks in support of the State's climate goals as well as in support of statewide public health and air quality objectives. Metropolitan planning organizations (MPOs) must prepare sustainable communities strategies (SCS) that will reduce GHG emissions to achieve these regional targets, if feasible to do so.

2026 Regional Targets Update

Pursuant to SB 375, CARB is required to update the regional targets no later than 2026. CARB staff began the target update process in 2024 with a public workshop and plans to conclude it in 2026 with Board approval of the new targets. CARB staff held a second public workshop in 2025. For more information on this effort, please contact sustainablecommunities@arb.ca.gov.

July 2024 Public Workshop

CARB staff held a public workshop on July 23, 2024, to provide information to the public about the target update and proposed timeline. CARB staff also received feedback about what factors to consider while developing its regional target recommendations for the

CARB Board.

These are the materials from the workshop and the workshop recording:

- Workshop agenda (en español)
- Workshop presentation (en español)
- Workshop recording (en español)

During the workshop, in addition to the regional targets update CARB staff also presented on proposed medium-term changes to the CARB SCS evaluation guidelines, received comments, and responded to questions. See the SCS Evaluation Resources webpage for further information on the evaluation guidelines update.

MPO Regional Targets Recommendations

As required in SB 375 and to promote an inclusive process, CARB exchanges technical information with MPOs as part of the regional targets update. For this update, CARB staff sent a formal request on July 29, 2024, for MPOs' recommendations and analysis.

Written communications between CARB and MPOs about the target update are on the 2026 Update page.

May 2025 Public Workshop

CARB staff held the second virtual public workshop to receive input on the 2026 SB 375 Regional Target Update on May 21, 2025. CARB staff intended this workshop to provide information to the public about the progress in the target update process and timeline as well as to receive input from the public on what factors to consider as it develops target recommendations.

These are the materials from the workshop and the workshop recording:

- Workshop agenda (en español)
- Workshop presentation (en español)
- Workshop recording (en español)

Current Regional Targets

As of March 2018, CARB's Board adopted the following regional targets to apply to each MPO region's SCS.

MPO	Targets Through September 30, 2018		Targets Beginning October 1, 2018	
	2020	2035	2020	2035
MTC/ABAG	-7%	-15%	-10%	-19%
SACOG	-7%	-16%	-7%	-19%
SANDAG	-7%	-13%	-15%	-19%
SCAG	-8%	-13%	-8%	-19%
Fresno COG	-5%	-10%	-6%	-13%
Kern COG			-9%	-15%
Kings CAG			-5%	-13%
Madera CTC			-10%	-16%
Merced CAG			-10%	-14%
San Joaquin COG			-12%	-16%
Stanislaus COG			-12%	-16%
Tulare CAG			-13%	-16%
AMBAG	0%	-5%	-3%	-6%
Butte CAG	1%	1%	-6%	-7%
San Luis Obispo COG	-8%	-8%	-3%	-11%

Santa Barbara CAG	0%	0%	-13%	-17%
Shasta RTA	0%	0%	-4%	-4%
Tahoe MPO	-7%	-5%	-8%	-5%

^a Targets are expressed as a percent change in per capita passenger vehicle greenhouse gas emissions relative to 2005.

^b If SACOG is not able to secure the funding and commitments to implement their proposed pilot project, CARB staff would evaluate the SCS performance against an 18 percent target. See Appendix A. MPO Recommendations and CARB Staff Recommendations, pages A-7 through A-9 for further discussion.

^c Recommended targets apply to the San Joaquin Valley MPOs third cycle SCS plans.

Information about the 2018 Regional Targets Update

CARB first set regional targets on September 23, 2010, and updated regional targets on March 22, 2018. Information and materials related to the 2010 target setting process is available upon request by emailing sustainablecommunities@arb.ca.gov. Information and materials related to the 2018 regional targets update is below:

- CARB Resolution (see Attachment D here) and Notice of Decision filed approving the updated targets (Mar. 2018)
- Updated Targets (Mar. 2018)
- Updated Final Staff Report: Proposed Update to the SB 375 GHG Emissions Reduction Targets
 - Appendix A: MPO Target Recommendations and CARB Staff Recommendations
 - Appendix B: MPO Scenario and Data Submittals
 - Appendix C: Rebound Analysis
 - Appendix D: MPO RTP Update Schedule
 - Appendix E: SB 375 Program Background
 - Appendix F: Final Environmental Analysis
 - Responses to Comments on the Draft Environmental Analysis

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2.3.1 Shute, Mihaly & Weinberger, LLP (on behalf of Fresno Building Healthy Communities)

Comment Code: P-1

Date: July 29, 2026

Response to Comment P-1-1

This commenter represents Fresno Building Healthy Communities and claims that, if the Fresno County Board of Supervisors does not place the Fresno County Transportation Improvement Act (Measure C Renewal)² on the 2026 general election ballot, it may affect the legal adequacy of the Draft PEIR. The comment suggests that Fresno COG urge the Fresno County Board of Supervisors to certify Measure C Renewal for the 2026 general election ballot.

CEQA does not require a lead agency to analyze purely economic impacts. CEQA is concerned with physical changes to the environment, and economic or social changes are not themselves significant environmental effects (*Friends of Davis v. City of Davis* [2000] 83 Cal.App.4th 1004, 1019–1020 [economic and social changes are not significant environmental effects in themselves and need be considered only when they are reasonably likely to produce physical environmental changes]; *Preserve Poway v. City of Poway* (2016) 245 Cal.App.4th 560, 575–576 [economic and social changes are not treated as significant environmental effects and therefore need not be mitigated or avoided under CEQA]). Such effects fall within CEQA’s scope only where substantial evidence demonstrates that they are reasonably likely to cause a physical environmental change (*Friends of Davis, supra*, at pp. 1019–1020 [speculative or unlikely indirect physical changes are not reasonably foreseeable and do not require CEQA analysis]; *Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal.App.4th 1184, 1205–1207 [economic and social effects are outside CEQA’s purview unless they are reasonably expected to cause adverse physical changes, such as urban decay]; CEQA Guidelines, § 15131, subd. (a).)

The comment, therefore, offers only speculation, not substantial evidence, that the potential loss of Measure C funding will cause any physical environmental change. Moreover, program EIRs for long-range planning documents such as RTPs may appropriately evaluate proposed transportation improvements before all funding necessary for their implementation has been secured (*Sustainable Transportation Advocates of Santa Barbara v. Santa Barbara County Assn. of Governments* (2009) 179 Cal.App.4th 113, 121–123 [recognizing that implementation of proposed transportation projects was conditioned on substantial funding from other sources and that the absence of assured funding did not preclude the agency from identifying and planning for those projects]). Even accounting for the potential loss of funding associated with Measure C, the Draft PEIR contains substantial evidence supporting its analysis and conclusions, which is all CEQA requires (*Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 435–436 [a reviewing court does not reweigh conflicting evidence or determine which side has the better argument and may not

² Fresno County voters passed an extension to the Measure C sales tax program in November 2006, continuing a half-cent sales tax for transportation purposes. Much of the planning and implementation of the Measure C Program is done by the Fresno COG, while the agency responsible for overseeing the implementation of Measure C is the Fresno County Transportation Authority (FCTA). The current Measure C extension is set to expire on June 30, 2027, which would occur after the Fresno COG’s certification of the 2026 RTP/SCS PEIR.

set aside an agency's factual conclusion merely because the opposite conclusion would have been equally or more reasonable]]).

As described in Chapter 3.0, Project Description, of the Draft PEIR, the analysis presented in the Draft PEIR assumes, but does not guarantee, that Measure C would be renewed prior to its expiration (refer to Draft PEIR page 3-64). The Fresno COG does not have the legal authority to certify Measure C Renewal for the 2026 general election ballot; this decision is ultimately the responsibility of the Fresno County Board of Supervisors. Therefore, the Draft PEIR relies on reasonable assumptions based on substantial evidence, including historical trends (e.g., the fact that Measure C has already been extended once, in 2006) (refer to Draft PEIR page 3-64). Whether a project may have a significant effect on the environment must be "based on substantial evidence in light of the whole record" (*State CEQA Guidelines* Section 21082.2[a]). Substantial evidence includes facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts (*State CEQA Guidelines* Section 15064[b]). Further, Section 15151 of the *State CEQA Guidelines* states the following:

"An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure."

At the time the Draft PEIR was prepared, Measure C Renewal was reasonably feasible for several reasons. First, precedent has already been established in 2006 with the renewal of Measure C, which passed with roughly 78 percent affirmative votes. Second, the Fresno COG conducted an official poll in October 2025 to gauge current voter opinion regarding Measure C Renewal, which indicated that roughly 72 percent of County residents surveyed were in favor.³ Finally, the Fresno COG regularly conducts planning and implementation of the Measure C Program and therefore had detailed knowledge of the program to pull from when forming its assumptions. Therefore, Measure C funding was included in the list of assumptions utilized in the financial calculations provided in the 2026 RTP/SCS. State law requires that a financial element of an RTP summarizes the cost of plan implementation "...constrained by a realistic projection of available revenues" (California Government Code Section 65080[b][2][K][4][A]). Because the renewal of Measure C funding was reasonably feasible and therefore realistically projected, the proposed 2026 RTP/SCS is consistent with this requirement.

It is also worth noting that Measure C Renewal is not guaranteed to be passed by voters even if included on the 2026 general election ballot and therefore could not be definitively known at the time the Draft PEIR was prepared and still cannot be definitively known prior to certification of the Final PEIR. Similarly, funding sources at the federal, State, and local levels are constantly subject to changes

³ Fresno Council of Governments (Fresno COG). 2025. Measure C Steering Committee. November 6. Website: <https://agendas.fresnocog.org/wp-content/uploads/2025/11/Measure-C-Steering-Committee-Minutes-11-6-25.pdf> (accessed August 27, 2026).

based on fluctuating political and economic conditions. For this reason, the funding sources identified in Table 3.D, Regional Transportation Plan Funding by Source (refer to Draft PEIR page 3-65), were assumed rather than guaranteed. At the time the Draft PEIR was prepared, there was substantial evidence to formulate a reasonable assumption that such sources would be available. For the Draft PEIR to guarantee funding outcomes would be speculative, which does not constitute substantial evidence valid for use in CEQA analyses (*State CEQA Guidelines* Section 15064[a]). Based on this, the analysis and conclusions of the Draft PEIR remain valid because the document provides a sufficient degree of analysis, based on reasonable assumptions and substantial evidence, to provide decision makers with information that enables them to make a decision that intelligently takes account of environmental consequences.

It is important to clarify that, if the Measure C Renewal is not included on the November 2026 ballot, it will be put on the March 2028 ballot since the initiative has collected enough valid signatures and is qualified to be on the ballot. Given that the current Measure C extension is set to expire on June 30, 2027, this could result in a period of 1 to 2 years during which Measure C funding may not be available, assuming voters would approve the renewal in 2028 (which cannot be guaranteed). As described in Chapter 3.0, Project Description, the horizon year for the proposed 2026 RTP/SCS is 2049. Because the timeline for the proposed 2026 RTP/SCS is approximately 23 years, it would be speculative to determine how this temporary lapse of funding would affect implementation of the transportation projects identified in the proposed 2026 RTP/SCS. Ultimately, the allocation of regional transportation funds is a public process, and stakeholders like Fresno Building Healthy Communities and others who are interested in the successful implementation of regional transportation improvements will have an opportunity to review and monitor those expenditures as they are considered.

Lastly, it is worth noting that the Fresno COG is currently in the process of developing a regional-level VMT mitigation program. This program may represent a new funding source for transit and active transportation projects, including those listed in the proposed 2026 RTP/SCS. Therefore, regardless of Measure C Renewal, this program represents a potential future source of funding for the VMT-reducing (e.g., transit and bike/pedestrian) projects identified in the proposed 2026 RTP/SCS.

This comment does not provide evidence that the environmental analysis in the Draft PEIR is inadequate, that there would be any new significant impacts not addressed in the Draft PEIR, or that impacts would be substantially more severe than those identified in the Draft PEIR. No revisions are necessary, and no further response is required.

Response to Comment P-1-2

This comment summarizes recent events pertaining to Measure C Renewal, including the Fresno County Board of Supervisors' decision to require preparation of a fiscal impact report for the measure which the commenter believes may prevent Measure C Renewal from being included on the 2026 general election ballot. The commenter suggests this could lead to the expiration of Measure C in June 2027 and the potential loss of transportation revenue. The commenter speculates that transportation facilities in the County will deteriorate as a result.

As previously stated, the Fresno COG does not have the legal authority to certify Measure C Renewal for the 2026 general election ballot; this decision is ultimately the responsibility of the Fresno County Board of Supervisors.

As previously stated, if Measure C Renewal was not included on the 2026 general election ballot, it would be included on the March 2028 ballot. Assuming Measure C Renewal is passed by voters in 2028 (which, as previously stated, is not a guaranteed outcome), this could result in a period of 1 to 2 years during which Measure C funding would be unavailable. Under this possible scenario, the reduced overall RTP/SCS funding would only be in effect for approximately 1 to 2 years of a 23-year implementation timeline, which may not necessarily result in long-term adverse impacts to roadway facilities in the region.

Regardless of whether Measure C Renewal is passed by voters, and whether this action occurs in 2026 or 2028, the commenter's claim that the delay in renewal of Measure C would directly result in the deterioration of transportation facilities in the County is speculative in nature. The consequences of reduced funding (e.g., which transportation projects would move forward) associated with a delay or outright denial of Measure C Renewal cannot be definitively known. The proposed 2026 RTP/SCS sets forth an action plan of projects and programs to address identified needs, such as maintaining and improving the regional street system (refer to Draft PEIR page 3-45). It is likely that under a scenario of reduced funding, the Fresno COG, FCTA, and implementing agencies would coordinate to prioritize remaining funding sources for critical roadway improvement projects with mobility and/or safety implications over non-vital improvements. As previously stated, speculation does not constitute substantial evidence valid for use in CEQA analyses (*State CEQA Guidelines* Section 15064[a]). Therefore, the transportation facility deterioration discussed in this comment may not occur if Measure C funding is not renewed.

As described in Section 4.17, Transportation, of the Draft PEIR, the roadway improvement projects included in the proposed 2026 RTP/SCS were derived from submissions by local governments, transit operators, and Caltrans, and collectively represent the short- or long-term vision of the partner agencies' plans for their transportation system/services (refer to Draft PEIR page 4.17-26). At the local level, many projects on the constrained project list are part of the Capital Improvement Plan (CIP) of the local municipalities (such as the City of Fresno). The projects submitted by the local agencies are expected to be consistent with the circulation elements in their adopted general plans, which provide a long-term vision for the transportation system in their respective cities within the Fresno COG Region. As with the Fresno COG, each local agency has made funding assumptions related to its transportation vision, including the assumption that Measure C would be renewed. Therefore, the Draft PEIR's conclusion that the proposed project would result in less than significant impacts with respect to conflicts with a program, plan, ordinance, or policy addressing the circulation system (Threshold 4.17.1), remains valid (refer to Draft PEIR page 4.17-27). In addition, remaining impacts with respect to inconsistency with *CEQA Guidelines* Section 15064.3 subdivision (b) (Threshold 4.17.2); increased hazards due to a geometric design feature or incompatible uses (Threshold 4.17.3); and inadequate emergency access (Threshold 4.17.4) have already been identified as significant and unavoidable, the most severe impact conclusion under CEQA (refer to Draft PEIR pages 4.17-31, 4.17-33, and 4.17-34). Given that this is the most severe impact conclusion under CEQA, even if revisions to the transportation analysis presented in the Draft PEIR were to occur, these revisions would not

yield a more conservative result. Therefore, the analysis of the proposed project's transportation impacts presented in the Draft PEIR remains valid.

As previously described, at the time the Draft PEIR was prepared, Measure C Renewal was reasonably feasible based on historical precedent, interim polling results, and the Fresno COG's working knowledge of the program. Because the renewal of Measure C funding was reasonably feasible and therefore realistically projected, the proposed 2026 RTP/SCS and its associated Draft PEIR were prepared in a manner consistent with State law (see California Government Code Section 65080[b][2][K][4][A]) and CEQA requirements (see *State CEQA Guidelines* Section 15064[b]). Therefore, even if Measure C were to never be renewed and the associated funding were to become permanently unavailable, the Draft PEIR would remain legally valid because substantial evidence was available at the time the Draft PEIR was prepared to support the reasonable assumption that renewal would occur.

Further, as previously stated, the Fresno COG is currently in the process of developing a regional-level VMT mitigation program. This program may represent a new funding source for transit and active transportation projects, including those listed in the proposed 2026 RTP/SCS. Therefore, regardless of Measure C Renewal, this program represents a potential future source of funding for VMT-reducing (e.g., transit and bike/pedestrian) projects identified in the proposed 2026 RTP/SCS. Ultimately, the allocation of regional transportation funds is a public process, and stakeholders like Fresno Building Healthy Communities and others who are interested in the successful implementation of regional transportation improvements will have an opportunity to review and monitor those expenditures as they are considered.

This comment does not provide evidence that the environmental analysis in the Draft PEIR is inadequate, that there would be any new significant impacts not addressed in the Draft PEIR, or that impacts would be substantially more severe than those identified in the Draft PEIR. No revisions are necessary, and no further response is required.

Response to Comment P-1-3

This comment claims the expiration of Measure C and the subsequent loss of transportation funding may affect the Fresno COG's ability to achieve applicable VMT and greenhouse gas (GHG) reduction targets pursuant to Senate Bill (SB) 375 and other planning mandates.

As described in Section 4.8, Greenhouse Gas Emissions, SB 375 requires that the Fresno COG demonstrate in its SCS that State GHG emission reduction targets for cars and light trucks will be met for 2035. In order to comply with this requirement, the Fresno COG conducted modeling in accordance with the *Technical Methodology to Estimate Greenhouse Gas Emission Reduction for Fresno COG's 2026 RTP/SCS* (Technical Methodology), which is included in Appendix C to the proposed 2026 RTP/SCS. This Technical Methodology was also submitted to CARB consistent with Government Code § 65080(b)(2)(J)(i). As described under Threshold 4.8.1, modeling conducted by the Fresno COG determined that implementation of the proposed 2026 RTP/SCS is anticipated to result in a 13.56 percent reduction in carbon dioxide (CO₂) emissions from 2005 levels in 2035 (refer to Draft PEIR page 4.8-18). This reduction exceeds the target set by CARB of a 13 percent reduction of GHG emissions by 2035. Therefore, the proposed 2026 RTP/SCS would achieve the currently adopted SB 375 reduction goals, which extend through year 2035.

Because a delay in or permanent loss of Measure C funding was not a reasonably foreseeable outcome at the time the proposed 2026 RTP/SCS and associated Draft PEIR were prepared (refer to Response to Comment P-1-1), the GHG emissions modeling did not, and was not required to, account for these scenarios. Because it would be speculative to determine how a temporary or permanent lapse of funding would affect implementation of the transportation projects identified in the proposed 2026 RTP/SCS, the potential GHG emissions of such scenarios cannot accurately be modeled at this time.

As described in Section 4.17, Transportation, of the Draft PEIR, VMT per capita is anticipated to decrease by 3.72 percent over the planning period for the proposed 2026 RTP/SCS, which indicates that the land use and transportation strategies implemented under the proposed project are effective in reducing automobile travel by encouraging shorter trip lengths, shifting trips to alternative modes, or reducing overall travel demand (refer to Draft PEIR page 4.17-30). This would result in a reduction in per-capita VMT.

Because a delay in or permanent loss of Measure C funding was not a reasonably foreseeable outcome at the time the proposed 2026 RTP/SCS and associated Draft PEIR were prepared (refer to Response to Comment P-1-1), the VMT modeling did not, and was not required to, account for these scenarios. Because it would be speculative to determine how a temporary or permanent lapse of funding would affect implementation of the transportation projects identified in the proposed 2026 RTP/SCS, the potential VMT reductions/increases of such scenarios cannot accurately be modeled at this time.

It is possible that the lapse in funding could lead to the prioritization of transit or bike/pedestrian projects over capacity-increasing projects. As described in the Draft PEIR (refer to Draft PEIR page 4.17-29), it is generally believed that added travel capacity on general-purpose lanes induces additional vehicle travel that would otherwise not take place. Although debates about the local context and precondition of congestion on the roadway have been ongoing among practitioners with regard to the generation of induced VMT, the analysis of the induced VMT in the proposed 2026 RTP/SCS was conducted through a hybrid methodology that includes both short-term and long-term induced VMT from added capacity-increasing transportation improvement projects in the plan. The induced VMT quantification methodology is documented in the Technical Methodology Memorandum, which is included as Appendix C to the proposed 2026 RTP/SCS. Therefore, under a scenario where the temporary or permanent loss of Measure C funding prevents implementation of capacity-increasing projects identified in the proposed 2026 RTP/SCS, it is possible that VMT and associated GHG emissions reductions would occur to an even greater degree than analyzed in the Draft PEIR. Therefore, as with the proposed project, this scenario would achieve applicable VMT and GHG reduction targets pursuant to SB 375 and other planning mandates, contrary to the commenter's assertion.

As previously stated, it would be speculative to predict the outcome of the proposed land use growth and transportation improvement projects, and associated GHG and VMT reductions, contained in the 2026 RTP/SCS in the event of a lapse in Measure C funding. In accordance with the requirements of CEQA, the modeling conducted by the Fresno COG in support of the 2026 RTP/SCS relied on reasonable assumptions based on substantial evidence at the time the Draft PEIR was prepared, including historical precedent, interim polling results, and the Fresno COG's working knowledge. This comment does not provide any evidence that a lapse in Measure C funding would directly affect the modeling used to identify the GHG and VMT reductions associated with implementation of the

proposed 2026 RTP/SCS. As described above, the Draft PEIR is not required to speculate as to how the temporary or permanent loss of Measure C funding may affect the implementation of the transportation projects identified in the proposed 2026 RTP/SCS. Therefore, the Draft PEIR remains valid in its analysis of reasonably foreseeable environmental impacts with respect to GHG emissions and VMT. Ultimately, the allocation of regional transportation funds is a public process, and stakeholders like Fresno Building Healthy Communities and others who are interested in the successful implementation of regional transportation improvements will have an opportunity to review and monitor those expenditures as they are considered.

Further, the Draft PEIR identified significant and unavoidable impacts related to both GHG emissions (Thresholds 4.8.1 and 4.8.2; refer to Draft PEIR pages 4.8-19 and 4.8-24) and VMT (Threshold 4.17.2; refer to Draft PEIR page 4.17-31). Given the programmatic nature of the proposed project and the scale of the Fresno COG Region, it cannot be definitively known whether potential impacts would be mitigated to below levels of significance. The Draft PEIR acknowledges that the responsibility to approve future projects, evaluate the applicability and feasibility of project-specific mitigation prescribed in the PEIR, and ensure implementation of mitigation deemed applicable and feasible ultimately belongs to Caltrans, local jurisdictions, and other responsible agencies. Therefore, potential impacts associated with GHG and VMT have been conservatively identified as significant and unavoidable, the most severe impact conclusion under CEQA. Given that this is the most severe impact conclusion under CEQA, even if revisions to the GHG and VMT analyses presented in the Draft PEIR were to occur, these revisions would not yield a more conservative result. Therefore, the analysis of the proposed project's potential GHG and VMT impacts presented in the Draft PEIR remains valid.

Therefore, regardless of whether the Measure C Renewal is included on the 2026 general election ballot and is passed by voters, the analysis of project-related GHG and VMT reductions provided in the Draft PEIR remain valid. The document provides a sufficient degree of analysis based on the reasonable assumption that Measure C funding would be available, which was supported by substantial evidence including historical precedent, interim polling results, and the Fresno COG's working knowledge of the program (refer to Response to Comment P-1-1). This analysis complied with CEQA by adequately providing decision makers with information that enables them to make a decision that intelligently takes account of environmental consequences.

This comment does not provide evidence that the environmental analysis in the Draft PEIR is inadequate, that there would be any new significant impacts not addressed in the Draft PEIR, or that impacts would be substantially more severe than those identified in the Draft PEIR. No revisions are necessary, and no further response is required.

Response to Comment P-1-4

This comment claims the expiration of Measure C will threaten the legal adequacy of the Draft PEIR, particularly with respect to the PEIR's project description, transportation analysis, and alternatives analysis because they rely on the assumption that Measure C funds would be available.

Specific concerns pertaining to the PEIR's project description, transportation analysis, and alternatives analysis were raised by the commenter in subsequent comments. Responses to those comments are described and addressed in further detail below. Because this specific comment does not contain any

substantive input or questions about the environmental analysis or conclusions contained in the Draft PEIR, no further response is required.

Response to Comment P-1-5

This comment describes CEQA requirements related to project descriptions and claims the project description provided in the Draft PEIR would fail to meet such requirements if Measure C is not renewed or replaced. The commenter suggests this failure would be related to the following: (1) the project description's financial calculations assume Measure C funds would be available, and (2) the project description would not provide an accurate description of the project's economic characteristics, which directly affect the ability for project components (e.g., transportation improvement projects) to be carried out and for related environmental effects to be analyzed.

Section 15124(c) of the *State CEQA Guidelines* requires that a project description include a "...general description of the project's technical, economic, and environmental characteristics". Chapter 3.0, Project Description, of the Draft PEIR satisfied this requirement by describing funding that, at the time the Draft PEIR was prepared, was reasonably available based on the revenue forecast. Specifically, the financially constrained project list identified programs for which funding had been identified or was reasonably expected to be available within the RTP's planning horizon, which included Measure C funding. The assumption that Measure C funding would be available was based on substantial evidence, including historical precedent, interim polling results, and the Fresno COG's working knowledge of the program (refer to Response to Comment P-1-1). Therefore, the project description relied on reasonable assumptions based on substantial evidence at the time the Draft PEIR was prepared, in accordance with the requirements of CEQA.

Further, the commenter's claim that the delay in renewal of Measure C would affect the ability for project components (e.g., transportation improvement projects) to be carried out is speculative in nature as the consequences of this outcome cannot be definitively known. As previously stated, speculation does not constitute substantial evidence valid for use in CEQA analyses (*State CEQA Guidelines* Section 15064[a]). Therefore, regardless of whether the Measure C Renewal is included on the 2026 general election ballot and is passed by voters, the project description remains valid because it provides a sufficient degree of analysis, based on reasonable assumptions and substantial evidence, to provide decision makers with information that enables them to make a decision that intelligently takes account of environmental consequences.

As previously stated, the Fresno COG is currently in the process of developing a regional-level VMT mitigation program. This program may represent a new funding source for transit and active transportation projects, including those listed in the proposed 2026 RTP/SCS. Therefore, regardless of Measure C Renewal, this program represents a potential future source of funding for VMT-reducing (e.g., transit and bike/pedestrian) projects identified in the proposed 2026 RTP/SCS.

This comment does not provide evidence that the environmental analysis in the Draft PEIR is inadequate, that there would be any new significant impacts not addressed in the Draft PEIR, or that impacts would be substantially more severe than those identified in the Draft PEIR. No revisions are necessary, and no further response is required.

Response to Comment P-1-6

This comment claims that, without Measure C funding, the Draft PEIR incorrectly concludes that the proposed project would have a less than significant impact with respect to conflicts with a program, plan, ordinance, or policy addressing the circulation system (Threshold 4.17.1). Specifically, the commenter notes fewer proposed transit programs and improvements would be implemented without renewal of Measure C funds. As a result, the proposed project would be inconsistent with local transit plans and programs, and that communities dependent on these programs throughout the County (including disadvantaged communities) could experience negative consequences.

As previously stated, speculation does not constitute substantial evidence valid for use in CEQA analyses (*State CEQA Guidelines* Section 15064[a]). The commenter's claim that the delay in renewal of Measure C would prevent proposed programs (e.g., transit programs) under the proposed 2026 RTP/SCS from being implemented, resulting in negative consequences for disadvantaged communities, is speculative in nature. As previously stated, if the Measure C Renewal is not included on the November 2026 ballot, it will be put on the March 2028 ballot since the initiative has collected enough valid signatures and is qualified to be on the ballot. Assuming Measure C renewal is passed by voters in 2028 (which, as previously stated, is not a guaranteed outcome), this could result in a period of 1-2 years during which Measure C funding would be unavailable. Under this possible scenario, the reduced overall RTP/SCS funding would only be in effect for approximately 1 to 2 years of a 23-year implementation timeline, which may not necessarily result in long-term consequences with respect to local transit plans and programs. Therefore, the negative consequences discussed in this comment may not occur.

Regardless of whether Measure C Renewal is passed by voters, and whether this action occurs in 2026 or 2028, the commenter's claim that the delay in renewal of Measure C would directly result in the negative community impacts is speculative in nature. The consequences of reduced funding (e.g., which transportation projects would move forward) associated with a delay or outright denial of Measure C Renewal cannot be definitively known. The proposed 2026 RTP/SCS sets forth an action plan of projects and programs to address identified needs, such as maintaining and improving the regional street system (refer to Draft PEIR page 3-45). It is likely that under a scenario of reduced funding, the Fresno COG, FCTA, and implementing agencies would coordinate to prioritize remaining funding sources for critical roadway improvement projects with mobility and/or safety implications over non-vital improvements. As previously stated, speculation does not constitute substantial evidence valid for use in CEQA analyses (*State CEQA Guidelines* Section 15064[a]). Therefore, the community impacts discussed in this comment may not occur if Measure C funding is not renewed.

The less than significant finding related to Threshold 4.17.1 was based on the proposed 2026 RTP/SCS being aligned with other regional programs, plans, and policies, as well as the general plans of each of the 15 incorporated cities and the County (refer to Draft PEIR page 4.17-27). This would remain true regardless of whether Measure C is renewed because the transportation improvement projects included in the proposed 2026 RTP/SCS were derived from submissions by local governments, transit operators, and Caltrans. These submissions collectively represent the short- or long-term vision of the partner agencies' plans for their transportation system/services. At the local level, many projects on the constrained project list are part of the CIPs of the local municipalities. The projects submitted by the local agencies would be consistent with the circulation elements in their adopted general plans,

which provide a long-term vision for the transportation system in their respective cities within the Fresno COG Region (refer to Draft PEIR page 4.17-26). As with the Fresno COG, each local agency has made funding assumptions related to its transportation vision, including the assumption that Measure C would be renewed. As a result, the financially constrained project list identified programs for which funding had been identified (or was reasonably expected to be available) within the RTP's planning horizon. Therefore, regardless of whether the Measure C Renewal is included on the 2026 general election ballot and is passed by voters, the Draft PEIR's analysis under Threshold 4.7.1 remains valid because it provides a sufficient degree of analysis, based on reasonable assumptions and substantial evidence, to provide decision makers with information that enables them to make a decision that intelligently takes account of environmental consequences.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft PEIR, or that impacts would be substantially more severe than those identified in the Draft PEIR. No revisions are necessary, and no further response is required.

Response to Comment P-1-7

This comment claims that, without Measure C funding, the proposed project would reduce only a fraction of the GHG emissions targeted to meet State goals under SB 375 and Assembly Bill (AB) 32 and therefore would be inconsistent with the CARB 2022 Climate Change Scoping Plan. The commenter suggests this inconsistency would invalidate the Draft PEIR's conclusion of less-than-significant impact with respect to conflicts with a program, plan, ordinance or policy addressing the circulation system (Threshold 4.17.1).

Refer to Response to Comment P-1-3 regarding the Fresno COG's ability to achieve applicable VMT and GHG reduction targets pursuant to SB 375 and other planning mandates. As described in the Response to Comment P-1-3, no evidence has been provided to demonstrate that a lapse in Measure C funding would directly affect the modeling used to identify the GHG and VMT reductions associated with implementation of the proposed 2026 RTP/SCS. Modeling used to estimate GHG and VMT reductions for the proposed project reflected reasonable assumptions based on substantial evidence at the time the Draft PEIR was prepared, in accordance with the requirements of CEQA. Further, the Draft PEIR conservatively identifies significant and unavoidable impacts related to both GHG emissions (Thresholds 4.8.1 and 4.8.2) and VMT (Threshold 4.17.2), which is the most severe impact classification under CEQA.

Refer to Response to Comment P-1-6 regarding the Draft PEIR's conclusion of less than significant impacts with respect to conflicts with a program, plan, ordinance or policy addressing the circulation system (Threshold 4.17.1). The Response to Comment P-1-6 states that, regardless of whether the Measure C Renewal is included on the 2026 general election ballot and is passed by voters, the Draft PEIR's analysis under Threshold 4.7.1 remains valid because it provides a sufficient degree of analysis, based on reasonable assumptions and substantial evidence, to provide decision makers with information that enables them to make a decision that intelligently takes account of environmental consequences.

This comment does not provide evidence that the environmental analysis in the Draft PEIR is inadequate, that there would be any new significant impacts not addressed in the Draft PEIR, or that

impacts would be substantially more severe than those identified in the Draft PEIR. No revisions are necessary, and no further response is required.

Response to Comment P-1-8

This comment describes CEQA requirements related to analysis of project alternatives. The commenter claims that, without Measure C funding, the Draft PEIR would fail to meet such requirements because all alternatives evaluated in the Draft PEIR (other than the No Project Alternative) assumed Measure C funding. The commenter suggests that, without Measure C funding, these alternatives would be infeasible, unreasonable, and ambiguous, and the Draft PEIR would have no evidence to support the identification of an environmentally superior alternative.

PRC Section 21100, subdivision (b)(4), requires an EIR to include a detailed statement addressing alternatives to the proposed project. Under the *State CEQA Guidelines*, however, the alternatives analysis is governed by a rule of reason. The EIR must evaluate a reasonable range of potentially feasible alternatives that could accomplish most of the project's basic objectives while avoiding or substantially lessening one or more of its significant environmental effects (*State CEQA Guidelines*, § 15126.6, subds. (a), (f)). It need not consider every conceivable alternative or every possible variation of the alternatives analyzed (*In re Bay-Delta Programmatic Environmental Impact Report Coordinated Proceedings* (2008) 43 Cal.4th 1143, 1163 [the rule of reason requires an EIR to analyze only those alternatives necessary to permit a reasoned choice]; *Marin Municipal Water District v. KG Land California Corp.* [1991] 235 Cal.App.3d 1652, 1665 [an EIR need not examine in detail every conceivable variation of the alternatives identified because both the range of alternatives and the level of analysis are governed by the rule of reason]). Accordingly, CEQA does not require the agency to rerun each alternative under every conceivable financial scenario—whether funding conditions are strained or unstrained—or under every possible set of technical assumptions, modeling inputs, or design variations. Indeed, an EIR need not include an economic or cost analysis of each alternative; it is sufficient that the EIR identifies and compares a reasonable range of potentially feasible alternatives and that any ultimate feasibility findings are supported by substantial evidence in the administrative record (*San Franciscans Upholding the Downtown Plan v. City & County of San Francisco* (2002) 102 Cal.App.4th 656, 690–692 [CEQA does not require an EIR to include evidence concerning the feasibility of each alternative, much less an economic or cost analysis of the alternatives and mitigation measures it identifies]). The analysis need only provide sufficient information to permit informed decision making and meaningful public participation; technical perfection and exhaustive analysis are not required (see e.g., *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 982, 988–989 [the analysis must be sufficiently specific to permit informed decision-making and public participation, but the requirement should not be construed unreasonably to defeat projects easily]).

As described in Chapter 5.0, Alternatives, of the Draft PEIR, all five SCS scenarios were developed through an open and engaging public process, and these ultimately were used to represent project alternatives for CEQA purposes (refer to Draft PEIR page 5-5). Each SCS scenario shows how future growth and development could be allocated to planned growth areas consistent with the general plans of the cities and the County. These alternatives represent a reasonable range of potential alternatives to the proposed project, which include the same set of strategies as the proposed project yet provide different priority structures for each strategy, therefore corresponding to a variety of outcomes. The Draft PEIR compared the potential environmental effects of the proposed project to

the potential effects of each alternative in relation to the environmental baseline and existing physical environmental setting.

Under CEQA, a Lead Agency may structure its alternatives analysis around a reasonable definition of a fundamental underlying purpose and need not study alternatives that cannot achieve that basic purpose. An EIR need not consider alternatives that are infeasible (*State CEQA Guidelines* Section 15126.6). Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site (or the site is already owned by the proponent) (*State CEQA Guidelines* Section 15126.6[f]). Chapter 5.0, Alternatives, of the Draft PEIR considered each of these factors, including economic viability, through reasonable assumptions based on substantial evidence, consistent with *State CEQA Guidelines* Section 21082.2(a).

CEQA establishes no legal imperative as to the scope of alternatives to be analyzed in an EIR, and there is no set number of alternatives that must be analyzed to fulfill the requirements of CEQA. Rather, as stated in *State CEQA Guidelines* Section 15126.6, the range of alternatives required in an EIR is governed by the “rule of reason,” which requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The Draft PEIR followed the requirements of CEQA in identifying a range of reasonable alternatives to the project that feasibly attain the project’s basic objectives while avoiding or substantially lessening significant adverse environmental effects of the project for consideration by decision makers.

The alternatives analysis presented in the Draft PEIR relies in part on outputs from simulation models that forecast future land use, travel patterns, and economic conditions through 2035. The Fresno COG developed an updated activity-based model (ABM) used for the proposed 2026 RTP/SCS (refer to Draft PEIR page 3.54). The ABM uses micro-zones, which are based on census blocks, as the fundamental spatial unit for generating travel demand. Additional details regarding this modeling process are provided in the Transportation and Land Use Appendix (Appendix C) of the proposed 2026 RTP/SCS. At the time the Draft PEIR was prepared, Measure C Renewal was reasonably feasible (as described in Response to Comment P-1-1), and therefore was assumed for all project alternatives. At that time, there was no greater substantial evidence to support the inclusion of an alternative assuming the absence of Measure C funding than the absence of any other funding source identified in Table 3.D, Regional Transportation Plan Funding by Source (refer to Draft PEIR page 3-65).

To develop an alternative assuming the absence of Measure C funding would be speculative, which does not constitute substantial evidence valid for use in CEQA analyses (*State CEQA Guidelines* Section 15064[a]). Further, such an alternative would not necessarily achieve the purpose of alternatives analysis under CEQA of substantially lessening significant adverse environmental effects of the project for consideration by decision makers.

Based on this, the analysis and conclusions of the Draft PEIR remain valid because the document provides a sufficient degree of analysis, based on reasonable assumptions and substantial evidence, to provide decision makers with information that enables them to make a decision that intelligently takes account of environmental consequences. This comment does not provide evidence that the

environmental analysis in the Draft PEIR is inadequate, that there would be any new significant impacts not addressed in the Draft PEIR, or that impacts would be substantially more severe than those identified in the Draft PEIR. No revisions are necessary, and no further response is required.

Response to Comment P-1-9

This comment provides concluding remarks and urges the Fresno COG to advocate for the Fresno County Board of Supervisors to reconsider their decision to require preparation of a fiscal impact report for Measure C Renewal. The comment requests that, in the event that renewal is delayed past 2027, the Fresno COG revise and recirculate the Draft PEIR to reflect this condition.

CEQA requires recirculation of a Draft EIR or components of a Draft EIR only when “significant new information” is added to a Draft EIR after public notice of the availability of the Draft EIR has occurred but before the Final EIR is certified (PRC Section 21092.1; *State CEQA Guidelines* Section 15088.5). Section 15088.5 of the *State CEQA Guidelines* specifically states: “New information added to an EIR is not ‘significant’ unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement.” It further states:

- (a) A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice of its availability. “Significant new information” requiring recirculation includes, for example, a disclosure showing that:
 - (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
 - (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
 - (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project’s proponents decline to adopt it.
 - (4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.
- (b) Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in the adequate EIR.
- (c) If the revision is limited to a few chapters or portions of the EIR, the lead agency need only recirculate the chapters or portions that have been modified.

- (d) Recirculation of an EIR requires notice pursuant to Section 15087, and consultation pursuant to Section 15086.
- (e) A decision not to recirculate an EIR must be supported by substantial evidence in the administrative record.

(State CEQA Guidelines Section 15088.5.)

Ultimately, the potential delay or denial of Measure C Renewal would not deprive the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the proposed project or a feasible way to mitigate or avoid such an effect. As described in earlier responses, the analysis and conclusions of the Draft PEIR remain valid regardless of Measure C Renewal, because the document provides a sufficient degree of analysis, based on reasonable assumptions and substantial evidence (refer to Response to Comment P-1-1), to provide decision makers with information that enables them to make a decision that intelligently takes account of environmental consequences.

In this case, there has been no significant new information, changes to the project, or changed circumstances that will result in: (1) new significant impacts; (2) a substantial increase in the severity of an environmental impact; or (3) the availability of new, considerably different feasible alternatives or mitigation measures that the project sponsor declines to adopt. Specifically, no new or substantially increased significant impacts would occur because the Draft PEIR has already identified significant and unavoidable impacts, representing the most severe impact conclusion under CEQA, for all but two thresholds of significance (refer to Draft PEIR pages 1-6 and 1-7). Further, as described in Response to Comment P-1-2, the Draft PEIR's conclusion that the proposed project would result in less than significant impacts with respect to conflicts with a program, plan, ordinance, or policy addressing the circulation system (Threshold 4.17.1) remains valid (refer to Draft PEIR page 4.17-27). Lastly, this comment letter does not present a new, considerably different feasible alternative or mitigation measure. Therefore, this comment does not contain significant new information requiring recirculation of the Draft PEIR. No revisions are necessary, and no further response is required.

Response to Comment P-1-10

This exhibit to Comments P-1-1 through P-1-9 provides an economic analysis of the proposed Measure C Renewal.

This comment, which does not raise concerns regarding the adequacy of the information or analysis provided in the Draft PEIR, is noted. No further response is required.

Response to Comment P-1-11

This exhibit to Comments P-1-1 through P-1-9 provides the current SB 375 regional GHG emissions reduction targets applicable to the Fresno COG Region.

This comment, which does not raise concerns regarding the adequacy of the information or analysis provided in the Draft PEIR, is noted. No further response is required.

Transportation Action/Discussion Item A: 2026 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) Documents and Public Hearing (Paul Herman) [PUBLIC HEARING]

July 29, 2026 at 5:30 p.m.

Transcript of Public Comment by: Sandra Celedon (on behalf of Fresno Building Healthy Communities)

259

00:32:43.640 --> 00:32:44.750

Sandra Celedon: Good evening.

260

00:32:44.920 --> 00:32:54.200

Sandra Celedon: My name is Sandra Celedon, and I'm here on behalf of Fresno Building Healthy Communities. Today, Fresno BHC submitted a comment letter, which I believe was referenced earlier.

261

00:32:54.250 --> 00:33:05.189

Sandra Celedon: on the draft environmental impact report for the 2026 Regional Transportation Plan, to bring to your attention serious concerns about the legal adequacy of the project's EIR.

262

00:33:05.220 --> 00:33:14.960

Sandra Celedon: I'm gonna summarize those comments today, but I would highly encourage you to read the letter that's dated July 29th, 2026, for further detailed information.

263

00:33:15.040 --> 00:33:22.829

Sandra Celedon: As you know, on July 14th, the County Board of Supervisors voted 3-2 to delay the Fresno County Transportation Improvement Act.

264

00:33:22.950 --> 00:33:31.590

Sandra Celedon: The only viable replacement measure that would prevent the expiration of Measure C without a successive measure in place

265

00:33:31.790 --> 00:33:48.279

Sandra Celedon: Instead of placing it directly on this November's ballot. Because of the required deadlines, county staff now have until August 7th to complete their fiscal report, which was requested by the Board of Supervisors, and staff have indicated that they may not meet it.

P-2-1

266

00:33:48.640 --> 00:34:04.689

Sandra Celedon: If the replacement measure is not placed on this year's ballot in November, as was previously mentioned, the current Measure C sales tax expires in June of 2027, creating a serious funding gap that directly undermines the EIR.

267

00:34:04.910 --> 00:34:13.670

Sandra Celedon: The EIR's project description explicitly assumes that Measure C will be renewed or replaced before it expires.

268

00:34:13.670 --> 00:34:26.219

Sandra Celedon: It's baked into the financial tables, the financially constrained project list, which is required under federal law, and the assumption that local funding grows as a share of the plan over time.

269

00:34:26.550 --> 00:34:37.910

Sandra Celedon: If that assumption fails, then the project description becomes factually inaccurate, which courts have called the fundamental building block of a legally adequate EIR.

270

00:34:38.239 --> 00:34:54.549

Sandra Celedon: This ripples into three more areas of the EIR. First, the finding that the project has no significant conflict with local transit plans, even though jurisdictions and transit agencies will be forced to cut services without Measure C funds.

271

00:34:54.780 --> 00:35:04.529

Sandra Celedon: Second, the region's ability to meet its SB375 greenhouse gas reduction targets depends on the availability of this funding.

272

00:35:04.580 --> 00:35:22.509

Sandra Celedon: And third, the EIR's alternatives analysis, since four of the 5 alternatives considered also rely on Measure C renewal or replacement funds. Their feasibility and the environmental comparisons would become speculative or impossible to evaluate.

273

00:35:22.610 --> 00:35:38.329

Sandra Celedon: In light of this, Fresno BHC requests that this policy board urge the County Board of Supervisors to call a special meeting on or before August 7th, and place the Fresno County Transportation Improvement Act, better known as the Better Roads, Safe Streets Initiative.

P-2-1
cont.

274

00:35:38.330 --> 00:35:54.069

Sandra Celedon: on the November ballot, and if those efforts are not fruitful, then the COG must withhold certification of this EIR and recirculate a revised version that honestly analyzes a non-renewal scenario.

P-2-1
cont.

275

00:35:54.150 --> 00:36:09.739

Sandra Celedon: We ask that this board take this letter and the ripple effects of not placing the only viable and qualified transportation measure on this November's ballot seriously, both for the sake of Fresno County's transportation future, and for the sake of each of your cities.

276

00:36:09.740 --> 00:36:18.459

Sandra Celedon: Because this will effectively make each of your cities ineligible for state and federal funding, and will expose this plan to legal challenge.

P-2-2

277

00:36:18.550 --> 00:36:19.439

Sandra Celedon: Thank you.

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2.3.2 Sandra Celedon (on behalf of Fresno Building Healthy Communities)

Comment Code: P-2

Date: July 29, 2026

Response to Comment P-2-1

This comment provides introductory remarks and summarizes the letter prepared by Shute, Mihaly & Weinberger, LLP on behalf of Fresno Building Healthy Communities, which is included in this Final PEIR as Comment P-1.

The points raised in the letter referenced in this comment have been addressed in Responses to Comments P-1-1 through P-1-11 above. No further response is required.

Response to Comment P-2-2

This comment requests that the letter (Comment P-1) be taken seriously and claims that the non-renewal of Measure C would make each Fresno COG member agency ineligible for State and federal funding and would expose the proposed 2026 RTP/SCS to legal challenges.

State CEQA Guidelines Section 15131(a) states “Economic or social effects of a project shall not be treated as significant effects on the environment...The focus on the analysis [in the EIR] shall be on the physical changes.” Therefore, the PEIR is not the appropriate venue to address the commenter’s concerns regarding the eligibility of Fresno COG member agencies for State and federal funding. Further, it would be speculative to attempt to determine whether each Fresno COG member agency would be eligible for State and federal funding. As previously discussed, funding sources at the federal, State, and local levels are constantly subject to changes based on fluctuating political and economic conditions. For this reason, the funding sources identified in Table 3.D, Regional Transportation Plan Funding by Source (refer to Draft PEIR page 3-65), were assumed rather than guaranteed. At the time the Draft PEIR was prepared, there was substantial evidence to formulate a reasonable assumption that such sources would be available (refer to Response to Comment P-1-1). Specifically, as described in Appendix B to the proposed 2026 RTP/SCS, revenues identified in the financial projection are those that have been provided for the construction, operation, and maintenance of the current roadway and systems in Fresno County. Baseline revenues included existing local, State, and federal transportation funding sources, many of which could automatically be considered applicable as they are long-term, ongoing programs. However, because funding at the federal, State, and local levels are constantly subject to changes based on fluctuating political and economic conditions, the funding sources identified in Table 3.D, Regional Transportation Plan Funding by Source (refer to Draft PEIR page 3-65), were assumed rather than guaranteed. Ultimately, the allocation of regional transportation funds is a public process, and stakeholders like Fresno Building Healthy Communities and others who are interested in the successful implementation of regional transportation improvements will have an opportunity to review and monitor those expenditures as they are considered. As described in Response to Comment P-1-1, at the time the Draft PEIR was prepared, Measure C Renewal was reasonably feasible based on historical precedent, interim polling results, and the Fresno COG’s working knowledge of the program. As with the other funding sources, Measure C funding was assumed but not guaranteed.

In summary, the Draft PEIR followed the requirements of CEQA by providing a sufficient degree of analysis, based on reasonable assumptions and substantial evidence (refer to Response to Comment P-1-1) to provide decision makers with information that enables them to make a decision that intelligently takes account of environmental consequences. Therefore, no basis for a legal challenge under CEQA exists.

There has been no significant new information, changes to the project, or changed circumstances that will result in: (1) new significant impacts; (2) a substantial increase in the severity of an environmental impact; or (3) the availability of new, considerably different feasible alternatives or mitigation measures that the project sponsor declines to adopt. Specifically, no new or substantially increased significant impacts would occur because the Draft PEIR has already identified significant and unavoidable impacts, representing the most severe impact conclusion under CEQA, for all but two thresholds of significance (refer to Draft PEIR pages 1-6 and 1-7). Further, as described in Response to Comment P-1-2, the Draft PEIR's conclusion that the proposed project would result in less than significant impacts with respect to conflicts with a program, plan, ordinance, or policy addressing the circulation system (Threshold 4.17.1) remains valid (refer to Draft PEIR page 4.17-27). Lastly, this comment letter does not present a new, considerably different feasible alternative or mitigation measure. This comment does not contain significant new information requiring recirculation of the Draft PEIR. No revisions are necessary, and no further response is required.

Transportation Action/Discussion Item A: 2026 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) Documents and Public Hearing (Paul Herman) [PUBLIC HEARING]

July 29, 2026 at 5:30 p.m.

Transcript of Public Comment by: Artie Panilla

279

00:36:25.600 --> 00:36:32.610

Artie Panilla: Good evening, everyone. My name is Artie Panilla, I am a resident of Fresno Assembly, and... refund.

280

00:36:33.240 --> 00:36:37.700

Artie Panilla: I've been doing community development work throughout the urban and rural areas of Fresno County

281

00:36:38.760 --> 00:36:43.420

Artie Panilla: I love what I do, and I'm honored to serve my community and be a part of a large group of people

282

00:36:43.810 --> 00:36:51.899

Artie Panilla: We're thinking about and working for our future, and trying to Oh, sorry. Sorry.

283

00:36:52.160 --> 00:37:08.589

Artie Panilla: I'm honored to serve my community and be a part of a larger group of people who are thinking about and working for our future and trying to ensure our communities are resourced to make sure things are better in Fresno County decades from now, and not worse. Given our county's enormous needs, and how hard our families work.

284

00:37:08.590 --> 00:37:18.370

Artie Panilla: I would hope to be here tonight to say that the conditions in our county, especially in our small cities and disinvested neighborhoods, are improving. Sadly, that is not the case.

285

00:37:18.640 --> 00:37:24.740

Artie Panilla: Road conditions are worsening, families are struggling, and basic infrastructure and services are minimal.

286

00:37:24.970 --> 00:37:37.690

P-3-1

P-3-2

Artie Panilla: That is why it's been so... I've been so grateful to work alongside so many community members who have been involved in renewing our half-cent sales tax for local streets and roads and essential services, like public transportation.

287

00:37:38.080 --> 00:37:55.979

Artie Panilla: Like many of you, I was disheartened at the county's decision to delay our opportunity to vote to renew our own sales tax measure. Hopefully, there's still a way to figure this out, because if we delay our vote, and delay our measure, then the regional transportation plan your staff is working on is out of whack.

P-3-2
cont.

288

00:37:56.110 --> 00:37:58.559

Artie Panilla: It assumes revenues that are not there.

289

00:37:58.800 --> 00:38:15.249

Artie Panilla: I would humbly request that you give your staff the direction to be honest and direct about the consequences of delaying this sales tax measure, even for 2 years, as well as what will happen to every jurisdiction's access to state and federal funding if we do not have these local dollars.

290

00:38:15.340 --> 00:38:19.740

Artie Panilla: With all that factored in, our regional transportation plan will need to totally change.

291

00:38:19.900 --> 00:38:32.190

Artie Panilla: Without proper documentation in our RTP, your work will likely be legally challenged. I know that legal challenges were a big concern expressed by Supervisor MagSig a couple of weeks ago at the county board meeting.

P-3-3

292

00:38:32.310 --> 00:38:42.570

Artie Panilla: By blocking an immediate vote on the citizen's petition and denying these local transportation dollars, this agency has now become more vulnerable to lawsuits. Thank you.

2.3.3 Artie Panilla

Comment Code: P-3

Date: July 29, 2026

Response to Comment P-3-1

This commenter describes their background conducting community development work in the County and provides introductory remarks.

This comment, which does not raise concerns regarding the adequacy of the information or analysis provided in the Draft PEIR, is noted. No further response is required.

Response to Comment P-3-2

This comment claims that road conditions in the County are worsening and expresses disappointment with the Fresno County Board of Supervisors' decision to delay Measure C Renewal, claiming that the delay would render the proposed 2026 RTP/SCS inaccurate as it assumes revenues that are not there.

As described in Response to Comment P-1-2, the Fresno COG does not have the legal authority to certify Measure C Renewal for the 2026 general election ballot; this decision is ultimately the responsibility of the Fresno County Board of Supervisors. Further, Measure C Renewal is not guaranteed to be passed by voters even if included on the 2026 general election ballot. Further, if the Measure C Renewal is not included on the November 2026 ballot, it will be put on the March 2028 ballot since the initiative has collected enough valid signatures and is qualified to be on the ballot. Given that the current Measure C extension is set to expire on June 30, 2027, this could result in a period of 1 to 2 years during which Measure C funding may not be available, assuming voters would approve the renewal in 2028 (which cannot be guaranteed). Given the overall timeline for the proposed 2026 RTP/SCS of approximately 23 years, it would be speculative to determine how this temporary lapse of funding would affect long-term implementation of the transportation projects identified in the proposed 2026 RTP/SCS. Ultimately, the allocation of regional transportation funds is a public process, and stakeholders like Fresno Building Healthy Communities and others who are interested in the successful implementation of regional transportation improvements will have an opportunity to review and monitor those expenditures as they are considered.

Funding sources at the federal, State, and local levels are constantly subject to changes based on fluctuating political and economic conditions. For this reason, the funding sources identified in Table 3.D, Regional Transportation Plan Funding by Source (refer to Draft PEIR page 3-65), including Measure C, were assumed rather than guaranteed. Further, program EIRs for long-range planning documents such as RTPs may appropriately evaluate proposed transportation improvements before all funding necessary for their implementation has been secured (*Sustainable Transportation Advocates of Santa Barbara v. Santa Barbara County Assn. of Governments* (2009) 179 Cal.App.4th 113, 121–123 [recognizing that implementation of proposed transportation projects was conditioned on substantial funding from other sources and that the absence of assured funding did not preclude the agency from identifying and planning for those projects]). Even accounting for the potential loss of funding associated with Measure C, the Draft PEIR contains substantial evidence supporting its analysis and conclusions, which is all CEQA requires (*Vineyard Area Citizens for Responsible Growth,*

Inc. v. City of Rancho Cordova (2007) 40 Cal.4th 412, 435–436 [a reviewing court does not reweigh conflicting evidence or determine which side has the better argument and may not set aside an agency’s factual conclusion merely because the opposite conclusion would have been equally or more reasonable]]. Therefore, the proposed 2026 RTP/SCS and Draft PEIR appropriately evaluated proposed transportation improvements based on reasonable assumptions of available funding based on substantial evidence available at the time (refer to Response to Comment P-1-1).

This comment does not provide evidence that the environmental analysis in the Draft PEIR is inadequate, that there would be any new significant impacts not addressed in the Draft PEIR, or that impacts would be substantially more severe than those identified in the Draft PEIR. No revisions are necessary, and no further response is required.

Response to Comment P-3-3

This comment requests transparency regarding the consequences of delaying Measure C Renewal, including consequences from reduced access to federal and State funding for Fresno COG member agencies. The commenter raises the proposed project’s potential vulnerability to lawsuits should these consequences not be considered.

The Fresno COG has complied with all applicable CEQA requirements pertaining to transparency and public disclosure. Refer to Response to Comment P-2-2 regarding speculation related to federal and State funding as well as the potential for litigation. No further response is required.

Transportation Action/Discussion Item A: 2026 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) Documents and Public Hearing (Paul Herman) [PUBLIC HEARING]

July 29, 2026 at 5:30 p.m.

Transcript of Public Comment by: Kay Burtkin

294

00:38:47.240 --> 00:39:03.639

Kay Burtkin: Good evening. My name is Kay Burtkin. I'm the co-president of the Fresno League of Women Voters. I had the very great pleasure of sitting, in the steering committee, among the members of the steering committee developing this, ballot measure proposal.

295

00:39:03.650 --> 00:39:11.469

Kay Burtkin: To extend the Measure C, taxing, to benefit the, the county.

296

00:39:11.670 --> 00:39:18.149

Kay Burtkin: I was impressed looking at the work that's gone into this RTP.

297

00:39:18.420 --> 00:39:37.809

Kay Burtkin: But basic assumptions of it are now false. I'll quote it for you. It is reasonable to assume that taxpayers will vote to extend the half-cent sales tax after 2027, extending through the RTP's planning horizon. That is no longer the case, given what happened at the Board of Supervisors last week.

298

00:39:38.260 --> 00:39:47.949

Kay Burtkin: An unfortunate decision that's really going to undermine the financing of any transportation, effort over the next

299

00:39:48.660 --> 00:40:04.339

Kay Burtkin: the horizon of your RTP, not only is the local tax, measures money not coming in, but it also puts in jeopardy any matching funds. There are no matching funds to apply for

300

00:40:04.350 --> 00:40:07.919

Kay Burtkin: For other available transportation funds.

301

00:40:07.930 --> 00:40:25.329

P-4-1

P-4-2

Kay Burtkin: It puts at risk, the investment decline in public transit and active transportation that would ensure that we meet our GHG emission reductions, so eligibility for that money would go away.

302

00:40:25.330 --> 00:40:32.389

Kay Burtkin: We've lost our local... we would lose our local partnership funds for a self-help county.

303

00:40:32.390 --> 00:40:38.599

Kay Burtkin: There is so much funding for transportation in the county that's been put in jeopardy.

304

00:40:38.600 --> 00:40:54.719

Kay Burtkin: on the basis of this vote, it is only to be hoped that there, is some reconsideration by the Board of Supervisors of this misguided effort. And I certainly hope the COG encourages the Board of Supervisors to reconsider

305

00:40:54.720 --> 00:41:03.880

Kay Burtkin: call a special meeting, and let the voters decide whether this transportation measure, in fact, meets their needs. Thank you.

P-4-2
cont.

P-4-3

2.3.4 Kay Burtkin

Comment Code: P-4

Date: July 29, 2026

Response to Comment P-4-1

This commenter describes their role in the preparation of the Measure C Renewal ballot measure and provides introductory remarks.

This comment, which does not raise concerns regarding the adequacy of the information or analysis provided in the Draft PEIR, is noted. No further response is required.

Response to Comment P-4-2

This comment claims the PEIR's assumption that Measure C would be renewed is false and that the delay in Measure C Renewal would undermine the financing of transportation improvement projects by threatening local funds, matching funds, and funds related to GHG emission reductions.

Refer to Response to Comment P-1-1 for an explanation as to why, at the time the Draft PEIR was prepared, Measure C Renewal was reasonably feasible and therefore is defensible from a CEQA standpoint. Refer to Response to Comment P-2-2 regarding speculation related to funding eligibility. Refer to Response to Comment P-1-3 regarding the Fresno COG's ability to achieve applicable GHG emissions reduction targets. No further response is required.

Response to Comment P-4-3

This comment requests that the Fresno COG Policy Board encourage the Fresno County Board of Supervisors to reconsider their earlier decision and/or to call a special meeting related to Measure C.

The Fresno COG does not have the legal authority to certify Measure C Renewal for the 2026 general election ballot; this decision is ultimately the responsibility of the Fresno County Board of Supervisors. Similarly, the Fresno COG does not have the authority to call a special meeting or facilitate a vote on Measure C Renewal.

This comment, which does not raise concerns regarding the adequacy of the information or analysis provided in the Draft PEIR, is noted. No further response is required.

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Transportation Action/Discussion Item A: 2026 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) Documents and Public Hearing (Paul Herman) [PUBLIC HEARING]

July 29, 2026 at 5:30 p.m.

Transcript of Public Comment by: Veronica Garibay

308

00:41:07.280 --> 00:41:30.259

Veronica Garibay: Good evening, Chair and members. My name is Veronica Garibay with Leadership Council, and I know that the letter, it's not very long, it's 10 pages, and I know it was submitted today, but take away the language around the California Environmental Quality Act and the EIR and conformity requirements. What it boils down to is the decision by the Fresno County Board of Supervisors to not place the only viable option and measure available

309

00:41:30.260 --> 00:41:31.720

Veronica Garibay: For voters, too.

310

00:41:31.720 --> 00:41:39.940

Veronica Garibay: vote on in November puts each and one of your cities at risk of accessing state and federal funding, period. That's the reality. That means

311

00:41:39.940 --> 00:41:42.649

Veronica Garibay: That you will not be able to access

312

00:41:42.650 --> 00:42:01.709

Veronica Garibay: state and federal funding, you don't have a local match to apply, and in some cases, you won't even be eligible to apply because you will not meet or comply with state-required greenhouse gas emission reduction targets that every county... I'm sorry, that every metropolitan planning organization, is required to meet under state law.

313

00:42:01.710 --> 00:42:09.000

Veronica Garibay: So the consideration for you here is how much are you willing to allow your own cities

314

00:42:09.120 --> 00:42:15.770

Veronica Garibay: To lose because of a decision by 3 supervisors, and put your communities at risk.

P-5-1

P-5-2

315

00:42:15.770 --> 00:42:29.840

Veronica Garibay: Over the course of the last couple of years, I've had the pleasure of getting to know and really read your active transportation plans, your Safe Routes to School plans, your short- and long-range transportation plans, all of which was used to help develop and shape

316

00:42:29.840 --> 00:42:39.790

Veronica Garibay: the Better Road Safe Streets Initiative, and including public input from members of your own communities to provide that. So, I would urge you

317

00:42:39.790 --> 00:42:59.710

Veronica Garibay: to ask the supervisors to reconsider their options so you don't lose access to state and federal funding, and that you're able to bring down dollars so that we don't suffer the devastating impacts of losing public transit service, active transportation investments, mobility-type projects that are used by your staff, by the COG staff.

318

00:42:59.710 --> 00:43:06.710

Veronica Garibay: to model to reduce greenhouse gas emission reduction targets that then is reported to the state.

319

00:43:06.840 --> 00:43:24.159

Veronica Garibay: short of that, you will have a plan that is not compliant, potentially, with both state and federal law, and subject to litigation on this matter, which would make it even worse. We are now just understanding the cascading impact and the ripple effects of last week's decision, and what it means for each of your cities. So, the county itself.

320

00:43:24.210 --> 00:43:35.509

Veronica Garibay: is not only at risk, every single one of your cities is at risk. That, I hope to make that clear. Thank you for your time and consideration of this matter. Thank you.

P-5-2
cont.

P-5-3

2.3.5 Veronica Garibay

Comment Code: P-5

Date: July 29, 2026

Response to Comment P-5-1

This commenter references the letter prepared by Shute, Mihaly & Weinberger, LLP on behalf of Fresno Building Healthy Communities (included in this Final PEIR as Comment P-1) and claims the delay of Measure C Renewal puts State and federal funding access at risk.

The points raised in the letter referenced in this comment have been addressed in Responses to Comments P-1-1 through P-1-11. In addition, refer to Response to Comment P-2-2 regarding speculation related to funding eligibility. No further response is required.

Response to Comment P-5-2

This comment references other plans prepared by the Fresno COG and urges the Fresno COG to ask the Fresno County Board of Supervisors to reconsider their decision in order to avoid the loss of funding, transit service, active transportation investments, and mobility projects used to determine GHG emissions reductions.

As previously stated, if the Measure C Renewal is not included on the November 2026 ballot, it will be put on the March 2028 ballot since the initiative has collected enough valid signatures and is qualified to be on the ballot. Assuming Measure C Renewal is passed by voters in 2028 (which, as previously stated, cannot be guaranteed), this could result in a period of 1 to 2 years during which Measure C funding would be unavailable. Under this possible scenario, the reduced overall RTP/SCS funding would only be in effect for approximately 1 to 2 years of a 23-year implementation timeline. Therefore, the commenter's claim that the delay in renewal of Measure C would directly result in the loss of funding, transit service, active transportation investments, and mobility projects used to determine GHG emissions reductions is speculative as these outcomes cannot be definitively known at this time. As previously stated, speculation does not constitute substantial evidence valid for use in CEQA analyses (*State CEQA Guidelines* Section 15064[a]). Ultimately, the allocation of regional transportation funds is a public process, and stakeholders interested in the successful implementation of regional transportation improvements will have an opportunity to review and monitor those expenditures as they are considered.

Regardless of whether Measure C Renewal is passed by voters and whether this action occurs in 2026 or 2028, the commenter's claim that the delay in renewal of Measure C would directly result in the loss of funding, transit service, active transportation investments, and mobility projects used to determine GHG emissions reductions is speculative in nature. The consequences of reduced funding (e.g., which transportation projects would move forward) associated with a delay or outright denial of Measure C Renewal cannot be definitively known.

It is possible that the lapse in funding could lead to the prioritization of transit or other projects that would contribute to reduced GHG emissions over capacity-increasing projects or other projects. Therefore, under a scenario where the temporary or permanent loss of Measure C funding prevents

implementation of capacity-increasing projects identified in the proposed 2026 RTP/SCS, it is possible that VMT and associated GHG emissions reductions would occur to an even greater degree than analyzed in the Draft PEIR. Therefore, as with the proposed project, this scenario would achieve applicable GHG reduction targets consistent with SB 375.

Further, the Draft PEIR identified significant and unavoidable impacts related to GHG emissions (Thresholds 4.8.1 and 4.8.2). Given the programmatic nature of the proposed project and the scale of the Fresno COG Region, it cannot be definitively known whether potential impacts would be mitigated to below levels of significance. The Draft PEIR acknowledges that the responsibility to approve future projects, evaluate the applicability and feasibility of project-specific mitigation prescribed in the PEIR, and ensure implementation of mitigation deemed applicable and feasible ultimately belongs to Caltrans, local jurisdictions, and other responsible agencies. Therefore, despite the proposed project achieving the applicable regional emissions reductions targets, potential impacts associated with GHG have been conservatively identified as significant and unavoidable, the most severe impact conclusion under CEQA (refer to Draft PEIR pages 4.8-19 and 4.8-24). Given that this is the most severe impact conclusion under CEQA, even if revisions to the GHG analysis presented in the Draft PEIR were to occur, these revisions would not yield a more conservative result. Therefore, the analysis of the proposed project's potential GHG impacts presented in the Draft PEIR remains valid.

Further, as described in Response to Comment P-1-1, the Fresno COG is currently in the process of developing a regional-level VMT mitigation program. This program may represent a new funding source for transit and active transportation projects, including those listed in the proposed 2026 RTP/SCS. Therefore, regardless of Measure C Renewal, this program represents a potential future source of funding for VMT-reducing (e.g., transit and bike/pedestrian) projects identified in the proposed 2026 RTP/SCS.

Therefore, the losses discussed in this comment may not occur if Measure C funding is not renewed. Further, refer to Response to Comment P-1-3 regarding the Fresno COG's ability to achieve applicable GHG emissions reduction targets. No further response is required.

Response to Comment P-5-3

This comment claims that if Measure C is not renewed, the proposed 2026 RTP/SCS would not comply with federal and State law and would place the Fresno COG and its member agencies at risk of litigation.

The Draft PEIR was prepared in a manner consistent with applicable CEQA requirements and other legal regulations. Refer to Response to Comment P-2-2 regarding the potential for litigation. No further response is required.

3.0 ERRATA

This chapter presents specific changes to the text of the Draft PEIR that are being made to clarify and supplement materials in the Draft PEIR. In no case do these revisions result in a greater number of impacts or impacts of a greater severity than those set forth in the Draft PEIR. Where revisions to the main text are called for, the page and section are set forth, followed by the appropriate revision. Added text is indicated with double underlined text. Text deleted is shown in ~~strikeout~~.

Pursuant to *State CEQA Guidelines* Section 15088.5(a):

A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. As used in this section, the term “information” can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not “significant” unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement. “Significant new information” requiring recirculation include, for example, a disclosure showing that:

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

Pursuant to *State CEQA Guidelines* Section 15088.5(b):

Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.

This document provides additional project details and supplemental analysis in response to comments. The modifications and additions clarify, amplify, or make other minor modifications to analyses in an otherwise adequate Draft PEIR and do not result in adverse environmental impacts or identify mitigations measures the applicant declines to adopt. Accordingly, the modifications and additions do not constitute significant new information and recirculation of the Draft PEIR is not required.

1. Section 4.10, Hydrology and Water Quality

The following text has been added to Page 4.10-20 of Section 4.10, Hydrology and Water Quality, of the Draft PEIR:

Central Valley Flood Protection Board Permit. The Central Valley Flood Protection Board (CVFPB) is the State's regulatory agency responsible for enforcing appropriate standards for the construction, maintenance, and operation of the flood control system that protects life, property, and habitat in California's Central Valley. The Board serves as the State coordinator between local flood management agencies and the federal government, with the goal of providing the highest level of flood protection possible to California's Central Valley. Per CCR Title 23, Division 1, Section 6, approval by the CVFPB is required for all proposed work or uses, including the alteration of levees within any area for which there is an Adopted Plan of Flood Control within CVFPB jurisdiction. In addition, permits from CVFPB are required for all proposed encroachments within a floodway, on adjacent levees, and within any Regulated Stream as identified in Title 23. Specifically, CVFPB jurisdiction includes the levee section, the waterward area between project levees, a minimum 10-foot-wide strip adjacent to the landward levee toe, the area within 30 feet from the top of bank(s) of Regulated Streams, and inside CVFPB Designated Floodways. Activities outside of these limits which could adversely affect Federal-State flood control facilities, as determined by the CVFPB, are also under the CVFPB's jurisdiction. Permits may also be required from CVFPB for existing unpermitted encroachments or where it is necessary to establish the conditions normally imposed by permitting, including where responsibility for the encroachment has not been clearly established or ownership or uses have been changed.

In addition, the text in Section 4.10, Page 4.10-38, has been revised as follows:

Flooding. As described in Section 4.10.4, certain regulations apply specifically to watercourses such as streams, rivers, and creeks. As applicable, future transportation improvement projects and land use developments located in the vicinity of a watercourse or multiple watercourses would be required to obtain all permits and authorizations (e.g., a Section 1602 Lake and Streambed Alteration Agreement) from agencies responsible for regulation of the affected watercourse(s), which may include the USACE, the CVFPB, the Central Valley RWQCB, CDFW, the California Coastal Commission, and local jurisdictions, and would be required to comply with all conditions issued by applicable agencies.

4.0 MITIGATION MONITORING AND REPORTING PROGRAM

4.1 MITIGATION MONITORING REQUIREMENTS

This Mitigation Monitoring and Reporting Program (MMRP) is designed to comply with California Public Resources Code (PRC) Section 21081.6, which mandates that a public agency adopt a reporting or monitoring program for changes made to the project or conditions of project approval to mitigate or avoid significant effects on the environment. The reporting or monitoring program must be designed to ensure compliance during project implementation, and mitigation measures must be enforceable through permit conditions, agreements, or other measures. Conditions of project approval may be set forth in referenced documents that address required mitigation measures or, in the case of the adoption of a plan, policy, regulation, or other project, by incorporating the mitigation measures into the plan, policy, regulation, or project design.

The monitoring program contains the following elements:

1. The mitigation measures are recorded with the action and procedure necessary to ensure compliance. In some instances, one action may be used to verify implementation of several mitigation measures.
2. A procedure for compliance and verification has been outlined for each action necessary. This procedure designates who will take action, what action will be taken and when, and to whom and when compliance will be reported.
3. The program has been designed to be flexible. As monitoring progresses, changes to compliance procedures may be necessary based upon recommendations by those responsible for the program. As changes are made, new monitoring compliance procedures and records will be developed and incorporated into the program.

Table B lists each of the Project-Specific Mitigation Measures (PMMs) and Fresno Council of Governments (Fresno COG) Mitigation Measures (FMMs). PMMs are project-specific measures developed to reduce or avoid environmental impacts associated with implementation of the proposed project. FMMs are Fresno COG measures that provide guidance and recommendations for member agencies and implementing agencies to consider during planning, review, and implementation of future projects. Table B also identifies the party or parties responsible for implementation and monitoring of each measure.

4.2 MITIGATION MONITORING PROCEDURES

The MMRP has been prepared in compliance with PRC Section 21081.6. It describes the requirements and procedures to be followed by the Fresno COG to ensure that all mitigation measures adopted as part of the proposed 2026 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) (proposed project) will be carried out as described in the Final EIR.

Table B lists each of the PMMs and FMMs specified in the Draft EIR and identifies the party or parties responsible for implementation and monitoring of each measure.

Table B: Mitigation Monitoring and Reporting Program

Project-Specific Mitigation Measures (PMMs) and Fresno COG Mitigation Measures (FMMs)	Timing	Responsible Party	Monitoring Agency	Date Completed and Initials
4.1: Aesthetics				
PMM AES-1: Implementing agencies shall consider mitigation measures to address potential aesthetic impacts that substantially degrade scenic vistas and visual character, as applicable and feasible: - During construction of individual Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) projects, the following measures shall be incorporated to minimize temporary and visual impacts: - Pre-construction clearing shall be limited to that necessary for construction. - Where feasible, existing vegetation, particularly vegetation along the edge of construction areas, shall be preserved to help screen views. - Existing trees shall be protected, where feasible, or replaced where removed to minimize visual impacts associated with clear-cutting. - After construction, areas disturbed by construction, staging, and storage shall be restored to original contours and revegetated with plant material similar in quantities and types to that which was removed and in compliance with local jurisdictional requirements. - To the extent feasible, construction staging shall not be located within the immediate foreground distance (~500 feet) of existing residential neighborhoods, recreational areas, or other land uses that include highly sensitive viewers. Where unavoidable, staging sites shall be screened from viewers using appropriate solid screening materials such as temporary fencing and walls. Fencing and walls shall be maintained, including removal of any graffiti. - Project design shall minimize contrasts in scale and massing between project elements and surrounding natural forms. This includes proposed grading that matches surrounding terrain in accordance with county and city hillside ordinances, where applicable. - During design and operation of individual RTP/SCS projects, the following measures shall be incorporated to minimize permanent visual impacts: - New development shall 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. - During project design, comparable range of colors and textures for building materials shall be used. Projects shall specify graffiti-resistant materials and finishes, where feasible and appropriate. - Landscaping shall be replaced and renewed where existing vegetation is removed. Project design shall incorporate plant species that complement the surrounding landscape and proposed development.	During project construction, design, and operation	Project Sponsor/ Construction Contractor	Implementing Agency/ Construction Contractor	

Table B: Mitigation Monitoring and Reporting Program

Project-Specific Mitigation Measures (PMMs) and Fresno COG Mitigation Measures (FMMs)	Timing	Responsible Party	Monitoring Agency	Date Completed and Initials
- Project design shall incorporate see-through safety barrier designs (e.g., railings rather than walls), as appropriate. - Project design shall incorporate landscaping along highway corridors to introduce natural elements and visual interest that soften the hard-edged, linear character of the transportation corridors, while following local design guidelines (where feasible), to ensure visual compatibility with the existing setting and minimize changes in visual quality or character. Local design guidelines may include setback buffers, landscaping, color, texture, signage, and lighting criteria. - Where sound walls are proposed, visual impacts shall be accounted for during sound wall design and construction, as follows: - Transparent panels shall be used, if feasible, to preserve views where proposed sound walls would block views from residences. - Landscaped earth berms, or a combination of wall and berm, shall be used, if feasible, to minimize the apparent sound wall height. - Sound walls of materials shall be designed with color and texture that complements the surrounding landscape and develops visual interest. - Landscaping shall be incorporated near proposed sound walls to screen the wall, where feasible. Native vegetation shall be used where feasible.				
PMM AES-2: Implementing agencies shall consider mitigation measures to address potential aesthetic impacts from light and glare, as applicable and feasible: - During construction, light and glare during construction shall be minimized through the implementation of temporary lighting controls and construction best management practices (BMPs). These practices include: - Limiting nighttime construction lighting to the minimum necessary for safety and security; - Shielding and directing temporary lighting downward and away from sensitive receptors and roadways; - Positioning lighting to avoid glare to motorists; - Using non-reflective materials on temporary structures and equipment, where feasible; - Installing temporary screening where construction occurs adjacent to light-sensitive uses. - Glare from transportation projects shall be minimized through the adoption of project design features that reduce glare. These features include: - Planting trees along transportation corridors to reduce glare from the sun; - Landscaping off-street parking areas, loading areas, and service areas; - Shielding transportation lighting fixtures to minimize off-site light trespass;	During project design and construction	Project Sponsor/ Construction Contractor	Implementing Agency/ Construction Contractor	

Table B: Mitigation Monitoring and Reporting Program

Project-Specific Mitigation Measures (PMMs) and Fresno COG Mitigation Measures (FMMs)	Timing	Responsible Party	Monitoring Agency	Date Completed and Initials
- Requiring lighting that illuminates parking areas to be hooded and arranged so as not to cause a nuisance to highway traffic or sensitive receptors. - Glare from land use projects shall be minimized through the adoption of project design features that reduce glare. These features include: - Limit the use of reflective materials, such as metal to the extent feasible. - Use non-reflective glass (or glass treated with a non-reflective coating) for all exterior windows and glass used on building surfaces. - Provide structural and/or vegetative screening from light-sensitive uses. - Direct architectural lighting onto building surfaces with low reflectivity to minimize glare, limit spillover onto adjacent properties, and reduce skyglow into the nighttime sky, thereby avoiding incidental light impacts on nearby private properties and undeveloped open space.				
4.2: Agricultural and Forestry Resources				
FMM AG-1: The Fresno Council of Governments (COG) shall encourage member agencies to pursue infill development in place of development in rural and environmentally sensitive areas. The Fresno COG shall encourage member agencies to seek funding to prepare specific plans and related environmental documents to facilitate mixed-use development, and to allow these areas to serve as receiver sites for transfer of development rights away from environmentally sensitive lands and rural areas outside established urban growth boundaries. The Fresno COG shall encourage member agencies to consider agricultural resources in all projects and avoid or minimize impacts on these areas.	Ongoing	Fresno COG	Fresno COG	N/A
PMM AG-1: Implementing agencies shall consider measures to reduce or mitigate substantial adverse effects related to the conversion of agricultural land to a non-agricultural use and/or lands under a Williamson Act or Farmland Security Zone (FSZ) contract, as applicable and feasible: - During design, consider project relocation or corridor realignment to avoid active agricultural lands and land under a Williamson Act or FSZ contract. - Establish off-site conservation easements on farmland of equal acreage and quality consistent with the recommendations of the California Department of Conservation (DOC); establish 20-year Farmland Security Zone contracts (Government Code Section 51296 et seq.) or 10-year Williamson Act contracts (Government Code Section 51200 et seq.) on farmland of equal acreage and quality; or use other conservation tools available from the DOC Division of Land Resource Protection.	During project design	Implementing Agency	Implementing Agency	

Table B: Mitigation Monitoring and Reporting Program

Project-Specific Mitigation Measures (PMMs) and Fresno COG Mitigation Measures (FMMs)	Timing	Responsible Party	Monitoring Agency	Date Completed and Initials
Should the appropriate implementing agency require mitigation as described above, the project sponsor shall provide proof for verification by the implementing agency that the measure has been fulfilled.				
4.3: Air Quality				
PMM AQ-1: Implementing agencies shall consider mitigation measures to address potential air quality impacts that would conflict with or obstruct implementation of the applicable air quality plan, as applicable and feasible: Prior to approval of individual RTP/SCS projects, each individual project shall conduct a project-level air quality analysis consistent with the requirements of the California Environmental Quality Act (CEQA) and applicable guidance from the San Joaquin Valley Air Pollution Control District (SJVAPCD) for review and approval by the appropriate member agency. The analysis shall quantify construction and operational emissions of criteria air pollutants and precursors and evaluate those emissions against the applicable thresholds of significance adopted by the SJVAPCD. If analysis demonstrates that project emissions would exceed one or more applicable thresholds of significance, the implementing agency shall require that all feasible mitigation measures to reduce emissions to the maximum extent practicable be identified and implemented. Such measures may include, but are not limited to, the following: Construction Measures: • All off-road diesel-powered construction equipment ≥50 horsepower shall meet or exceed Tier 4 Final emission standards. • For projects where electrical grid power is available, construction shall minimize the use of diesel generators. • Low-volatile-organic-compound (VOC) architectural coatings, paints, adhesives, and sealants shall be used to the extent feasible. Operational Measures: • Projects shall be designed to minimize or eliminate the use of natural gas in buildings, prioritizing all-electric building systems where feasible. • Electric vehicle (EV) charging infrastructure shall be installed consistent with, or exceed, applicable code requirements to support zero-emission vehicle use. • Zero-emission landscaping equipment or the requirement for electric-powered maintenance equipment shall be incorporated into project design where feasible.	Prior to project approval	Project Sponsor/ Construction Contractor	San Joaquin Valley Air Pollution Control District (SJVAPCD)	

Table B: Mitigation Monitoring and Reporting Program

Project-Specific Mitigation Measures (PMMs) and Fresno COG Mitigation Measures (FMMs)	Timing	Responsible Party	Monitoring Agency	Date Completed and Initials
PMM AQ-2: Implementing agencies shall consider mitigation measures to address potential air quality impacts that would expose sensitive receptors to substantial pollutant concentrations, as applicable and feasible: - For projects proposed within 500 feet of existing sensitive receptors, the implementing agency shall require the preparation of a Construction Health Risk Assessment (HRA) prior to project approval. The HRA shall: - Estimate emissions of toxic air contaminants (TACs), including diesel particulate matter (DPM), from construction equipment and activities. - Model pollutant dispersion to determine project-specific concentrations at nearby sensitive receptor locations. - Evaluate potential cancer and non-cancer hazards in comparison to the SJVAPCD's adopted health risk thresholds. - If it is determined that the unmitigated health risk would exceed applicable thresholds, measures to reduce TAC exposure may include, but are not limited to, the following: - The project shall use Tier 4, or cleaner, off-road equipment during construction. - For projects where electrical grid power is available, construction shall minimize the use of diesel generators to the extent feasible. - Construction shall be phased to reduce simultaneous heavy equipment activity near sensitive receptors, where feasible.	Prior to project approval and during construction	Implementing Agency	Implementing Agency/SJVAPCD's	
4.4: Biological Resources				
PMM-BIO-1: Implementing agencies for a project shall consider mitigation measures to reduce substantial adverse effects related to threatened and endangered species, as applicable and feasible: - Occupied habitat and potentially suitable habitat for threatened, endangered, or rare species, as well as designated critical habitat in project design, shall be avoided during project design wherever practicable and feasible. - Where projects impact suitable habitat for special-status species and/or listed or sensitive species that have specific field survey protocols/guidelines outlined by the United States Fish and Wildlife Service (USFWS), the California Department of Fish and Wildlife (CDFW), or other local agency, focused species surveys shall be conducted prior to construction. If appropriate, surveys shall follow applicable protocols and guidelines and be conducted by qualified personnel. If sensitive plants or wildlife are present, qualified staff shall identify species-specific measures to avoid, minimize, and/or mitigate for potential impacts in consultation with the USFWS or CDFW.	During project design and construction	Implementing Agency, Qualified Biologist	Implementing Agency/United States Fish and Wildlife Service (USFWS)/California Department of Fish and Wildlife (CDFW)	

Table B: Mitigation Monitoring and Reporting Program

Project-Specific Mitigation Measures (PMMs) and Fresno COG Mitigation Measures (FMMs)	Timing	Responsible Party	Monitoring Agency	Date Completed and Initials
- Where avoidance is infeasible for species protected under the federal Endangered Species Act (FESA), the California Endangered Species Act (CESA), or local/regional ordinances and policies, conservation measures to mitigate the loss of habitat and fulfill the requirements of the applicable authorization for incidental take pursuant to Section 7 or 10(a) of FESA, Section 2081 of CESA to support issuance of an incidental take permit, and/or as identified in local/regional plans shall be implemented. Conservation strategies to protect the survival and recovery of federally and State-listed endangered and local special-status species may include: - Impact minimization strategies - Contribution of in-lieu fees - Use of in-kind mitigation bank credits - Habitat restoration, creation, rehabilitation, and/or enhancement - Establishment of conservation easements - Temporary access roads and staging areas shall not be located within areas containing sensitive plants, wildlife species, or native habitat wherever feasible. - A worker environmental awareness program (environmental education) shall be implemented during construction to inform project workers of their responsibilities and avoid/minimize impacts on sensitive biological resources. - A qualified botanist shall evaluate the project area during design to document the presence or absence of special status plant species. - A qualified biologist shall monitor construction activities within or adjacent to occupied special-status species habitat to facilitate the avoidance of resources not permitted for impact. - Highly visible markers and/or temporary fencing shall be installed prior to the start of construction to keep project activities within the cleared disturbance footprint. - Construction shall be temporarily halted if protected wildlife enter work areas to allow wildlife to move through the work area unharmed. - If special status-species or sensitive habits are identified, a qualified biologist shall be used to monitor implementation of mitigation measures during construction. - Construction activities shall be scheduled to avoid sensitive time periods for biological resources (e.g., steelhead spawning periods during the winter and spring, the nesting bird season). - An invasive species control plan shall be developed for areas of high-quality native habitat disturbed by project construction. - Appropriate sound attenuation measures and other BMPs shall be implemented where needed to protect sensitive wildlife species.				

Table B: Mitigation Monitoring and Reporting Program

Project-Specific Mitigation Measures (PMMs) and Fresno COG Mitigation Measures (FMMs)	Timing	Responsible Party	Monitoring Agency	Date Completed and Initials
- Pre-construction surveys shall be conducted prior to construction by a qualified biologist to delineate sensitive species habitat to facilitate avoidance. - During design, existing habitat on both sides of the proposed project shall be considered and design features included to retain/improve wildlife connectivity where feasible.				
PMM BIO-2: Implementing agencies shall consider mitigation measures to reduce substantial adverse effects related to riparian habitats and other sensitive natural communities, as applicable and feasible: - During project design, implementing agencies shall consult with the USFWS and/or National Marine Fisheries Service (NMFS) where riparian or sensitive habitats provide potential for occupied habitat for federally listed rare, threatened, and endangered species afforded protection pursuant to FESA. - During project design, implementing agencies shall consult with the United States Forest Service (USFS) where sensitive or riparian habitats provide potential for occupied habitat for Forest Sensitive Species for the four national forests in the Fresno COG Region. - During project design, implementing agencies shall consult with the CDFW where such State-designated sensitive or riparian habitats provide potential for occupied habitat for State-listed rare, threatened, and endangered species afforded protection pursuant to CESA, or Fully Protected Species afforded protection pursuant to the California Fish and Game Code. - During project design, implementing agencies shall consult with the CDFW pursuant to the provisions of Section 1600 of the State Fish and Game Code as they relate to impacts to lakes and streambeds. - During project design, implementing agencies shall consult with the USFWS, USFS, and CDFW, as appropriate, where State-designated sensitive or riparian habitats are occupied by birds afforded protection pursuant to the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code during the breeding season. - Sensitive natural communities and riparian habitats shall be avoided, wherever practicable and feasible, during project design. Where practicable and feasible, upland buffers shall be included in the project to minimize impacts to riparian corridors. - Where avoidance is infeasible, sufficient conservation measures shall be developed through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW), as appropriate, to protect sensitive natural communities and riparian habitats and develop appropriate compensatory mitigation where required. - A qualified biologist shall monitor construction activities that may occur in or adjacent to, sensitive and riparian habitats and implementation of mitigation measures.	During project design and construction	Implementing Agency/ Qualified Biologist	Implementing Agency/USFWS/ CDFW/ National Marine Fisheries Service (NMFS)	

Table B: Mitigation Monitoring and Reporting Program

Project-Specific Mitigation Measures (PMMs) and Fresno COG Mitigation Measures (FMMs)	Timing	Responsible Party	Monitoring Agency	Date Completed and Initials
- When construction activities require stream crossings, work shall be scheduled during dry conditions and use rubber-wheeled vehicles, when feasible. A qualified wetland scientist or regulatory specialist shall determine if potential project impacts require regulatory permits from the United States Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), and/or CDFW prior to construction. - Temporary construction fencing, or other suitable markings, shall be installed around the perimeter of sensitive and riparian habitat prior to construction. - Topsoil (the surface material from 6 to 12 inches deep) and perennial native plants, when recommended by a qualified ecologist/biologist, shall be salvaged and stockpiled for use in restoring native vegetation to areas of temporary disturbance within the project area. Salvage of soils containing invasive species, seeds, and/or rhizomes shall be avoided as identified by a qualified ecologist/biologist. - Appropriate, locally native vegetation shall be installed following the completion of construction activities, as identified by the qualified ecologist/biologist. - BMPs shall be used at construction sites to minimize erosion and sediment transport from the area. BMPs include encouraging growth of native vegetation in disturbed areas, using straw bales or other silt-catching devices, and using settling basins to minimize soil transport.				
PMM BIO-3: Implementing agencies shall consider mitigation measures to reduce substantial adverse effects related to aquatic resources, as applicable and feasible: - An aquatic resources delineation shall be completed by a qualified biologist or regulatory specialist during project design to identify and map the extent of State and federally protected aquatic resources. Impacts to these aquatic resources shall be avoided or minimized in project design, consistent with the provisions of Sections 404 and 401 of the Clean Water Act (CWA), the Porter-Cologne Water Quality Control Act, and/or Section 1600 of Fish and Game Code. - Where avoidance of aquatic resources is infeasible and authorizations from the USACE, RWQCB, and/or CDFW are required, sufficient conservation measures and/or mitigation shall be developed to fulfill the requirements of those authorizations.	During project design	Implementing Agency/ Qualified Biologist	Implementing Agency/ CDFW/United States Army Corps of Engineers (USACE)/ Regional Water Quality Control Board (RWQCB)	
PMM BIO-4: Implementing agencies for a project shall consider mitigation measures to reduce substantial adverse effects related to wildlife movement, as applicable and feasible: During project design, implementing agencies shall consult with the USFS where impacts to migratory wildlife corridors may occur in an area afforded protection by an adopted Forest Land Management Plan or Resource Management Plan for the four national forests in the region.	During project design and construction	Implementing Agency/ Qualified Biologist/ Construction Contractor	Implementing Agency/ CDFW/USACE/ Regional Water Quality Control Board (RWQCB)	

Table B: Mitigation Monitoring and Reporting Program

Project-Specific Mitigation Measures (PMMs) and Fresno COG Mitigation Measures (FMMs)	Timing	Responsible Party	Monitoring Agency	Date Completed and Initials
- During project design, consult with counties, cities, and/or other local organizations, as appropriate, when impacts may occur to open space areas that have been designated as important for wildlife movement related to local ordinances or conservation plans. - A qualified biologist shall conduct surveys to identify active migratory/native bird nests no more than 7 days before the start of construction at project sites from February 1 through August 31. - Construction activities shall be prohibited within 250 feet of active raptor nests and 50 feet of active non-raptor nests. - When feasible and practicable during project design, impacts shall be minimized to wildlife movement and existing functional wildlife corridors shall be preserved. Site-specific analyses of opportunities to preserve or improve habitat linkages shall be conducted during project design, if appropriate. - Long, linear projects with the possibility of impacting wildlife movement shall analyze habitat linkages/wildlife movement corridors on a broad scale to avoid critical choke points that could reduce the function of recognized movement corridors. - Construction drawings and habitat connectivity mapping shall be reviewed by a qualified biologist during design to determine the risk of habitat fragmentation. - When practicable and feasible, projects shall be designed to promote wildlife corridor redundancy by including multiple connections between habitat patches. - During project design, the potential for overpasses, underpasses, and culverts shall be evaluated to create wildlife crossings where a project may interrupt the movement of species. Wildlife crossings shall be provided in accordance with proven standards, such as the Federal Highway Administration's (FHWA) <i>Critter Crossings</i>, and in consultation with wildlife corridor authorities. - Directional wildlife fencing shall be installed, where appropriate, to minimize wildlife injury due to direct interaction between wildlife and roads or construction. - Where avoidance is infeasible, sufficient conservation measures shall be designed through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) and in accordance with the respective County and cities' general plans to mitigate for the temporal or permanent loss of fish and wildlife movement corridors and/or wildlife nursery sites. The consideration of conservation measures may include the following measures where applicable: - Wildlife movement buffer zones - Corridor realignment - Appropriately spaced breaks in center barriers				

Table B: Mitigation Monitoring and Reporting Program

Project-Specific Mitigation Measures (PMMs) and Fresno COG Mitigation Measures (FMMs)	Timing	Responsible Party	Monitoring Agency	Date Completed and Initials
○ Stream rerouting ○ Culverts ○ Creation of artificial movement corridors such as freeway under- or overpasses ○ Acquisition of contiguous adjacent land parcels to be protected in perpetuity from encroachment and development ○ Other comparable measures ● Applicable and appropriate guidance (e.g., FHWA HEP 16 059), as well as BMPs, shall be incorporated into project design to benefit pollinators, with a focus on native plants. ● During design, berms and sound/sight barriers at wildlife crossings shall be evaluated to encourage wildlife to utilize crossings. Sound and lighting shall be minimized, particularly in areas adjacent to natural habitats. ● Lighting impacts on sensitive species shall be reduced through implementation of mitigation measures, such as, but not limited to: ○ High-pressure sodium and/or cut-off fixtures shall be incorporated into project design instead of typical mercury-vapor fixtures for outdoor lighting. ○ Exterior lighting shall be designed to confine illumination to the project site. Structural and/or vegetative screening shall be provided for light-sensitive uses where feasible. ○ Non-reflective glass, or glass treated with a non-reflective coating, shall be specified for all exterior windows and glass used on building surfaces. ○ Architectural lighting onto building surfaces shall be directed to minimize glare and limit light intrusion onto adjacent properties. ● Noise impacts to sensitive species shall be minimized through implementation of mitigation measures. Some measures from PMM NOI-1 (see Section 4.13, Noise) may also be applicable where they support these objectives, including, but not limited to: ○ Temporary noise barriers shall be installed around sensitive habitat during construction. ○ Where feasible, structural and/or vegetative screening shall be provided for noise sensitive habitats. ○ Construction equipment shall be properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices. ○ Hydraulically or electrically powered tools shall be used during construction to avoid noise associated with compressed air exhaust from pneumatic tools. Where pneumatic tools are unavoidable, exhaust mufflers and tool jackets shall be used to reduce noise. ○ Quieter procedures (e.g., drills rather than impact equipment) shall be used during construction, when feasible.				

Table B: Mitigation Monitoring and Reporting Program

Project-Specific Mitigation Measures (PMMs) and Fresno COG Mitigation Measures (FMMs)	Timing	Responsible Party	Monitoring Agency	Date Completed and Initials
- Equipment and trucks with the best available noise control techniques shall be used during construction. - Where feasible, include buffers as large as possible between sensitive habitats and freeways in project design. - To the extent practicable, construction at night and during dawn and dusk, when wildlife activity is highest, shall be avoided.				
PMM BIO-5: Implementing agencies shall consider mitigation measures to reduce conflicts with local policies and ordinances protecting biological resources, such as trees, as applicable and feasible: - During design, implementing agencies shall consult with the appropriate local agency responsible for the administration of the policy or ordinance protecting biological resources. - Existing trees shall be retained on site consistent with local regulations. Adequate protection during construction shall be provided for any trees that are to remain, as recommended by an International Society of Arboriculture (ISA) Certified Arborist. - During design, if specific project area trees are designated as “Protected Trees,” “Landmark Trees,” or “Heritage Trees,” approval for encroachment or removals shall be obtained through the appropriate entity. Appropriate mitigation measures shall be developed to ensure that the trees are replaced. Mitigation trees shall be locally sourced native species, as directed by a certified arborist. - An ISA-Certified Arborist shall monitor construction activities that may occur in areas with trees designated as “Protected Trees,” “Landmark Trees,” or “Heritage Trees” to facilitate avoidance of resources not permitted for impact. Before the start of any clearing, excavation, construction, or other work on the site, fencing shall be installed for every protected tree deemed to be potentially endangered by said site work. Fences shall be left in place for the duration of all such work. All trees to be removed shall be clearly marked. - The removal and disposal of logs, brush, earth, and other debris shall be planned to avoid injury to any protected tree. Where proposed development or other site work could encroach upon the dripline of any protected tree, special measures to allow the roots to breathe and obtain water and nutrients shall be implemented. Excavation, cutting, filling, or compaction of the existing ground surface shall be minimized within the dripline. No change in existing ground level shall occur from the base of any protected tree. No burning or use of equipment with an open flame shall occur near or within the protected perimeter of any protected tree. - No storage or dumping of oil, gas, chemicals, or other substances that may be harmful to trees shall occur within the dripline of any protected trees or any other location on the site from which such substances might enter the protected perimeter. No heavy construction	During project design and construction	Implementing Agency/ ISA-Certified Arborist/ Construction Contractor	Implementing Agency	

Table B: Mitigation Monitoring and Reporting Program

Project-Specific Mitigation Measures (PMMs) and Fresno COG Mitigation Measures (FMMs)	Timing	Responsible Party	Monitoring Agency	Date Completed and Initials
equipment or construction materials shall be operated or stored within the dripline of any protected trees. Wires, ropes, or other devices shall not be attached to any protected tree, except as needed for support of the tree. • The leaves of protected trees shall be periodically sprayed with water during construction to prevent buildup of dust and other pollution that would inhibit leaf transpiration, as directed by the certified arborist. • If any damage to a protected tree occurs during construction, the appropriate local agency shall be immediately notified of such damage. If the damaged tree cannot be preserved in a healthy state, as determined by the certified arborist, the tree shall be replaced with another tree or trees on the same site as deemed adequate by the local agency to compensate for the loss of the tree that is removed. • Where avoidance is infeasible, sufficient conservation measures shall be developed to fulfill the requirements of the applicable policy or ordinance, such as to support issuance of a tree removal permit. The consideration of conservation measures may include: ○ Avoidance strategies ○ Contribution of in-lieu fees ○ Planting of replacement trees ○ Re-landscaping areas with native vegetation post-construction ○ Other comparable measures developed in consultation with the local agency and certified arborist.				
4.5: Cultural Resources				
PMM CUL-1: Implementing agencies shall consider mitigation measures to reduce substantial adverse changes in the significance of a historical resource, as applicable and feasible: As part of the appropriate environmental review of individual projects, a record search at the Southern San Joaquin Valley Information Center (SSJVIC) at California State University, Bakersfield, shall be conducted to determine whether the project area has been previously surveyed and whether resources were identified.	During CEQA environmental review	Implementing Agency	Implementing Agency	
PMM CUL-2: Implementing agencies shall consider mitigation measures to reduce substantial adverse changes in the significance of an archaeological resource. Such measures may include the following or other comparable measures identified by implementing agencies: If SSJVIC recommends a survey of an individual project site, the implementing agency shall obtain a qualified architectural historian to conduct historic architectural surveys of affected buildings, structures, or objects to determine their individual or potential collective eligibility for listing in the California Register of Historical Resources (CRHR) and/or National Register of Historic Places (NRHP).	During CEQA environmental review	Implementing Agency/Qualified Architectural Historian	Implementing Agency/San Joaquin Valley Information Center (SSJVIC)	

Table B: Mitigation Monitoring and Reporting Program

Project-Specific Mitigation Measures (PMMs) and Fresno COG Mitigation Measures (FMMs)	Timing	Responsible Party	Monitoring Agency	Date Completed and Initials
Based on the results of the surveys, the implementing agency shall develop measures to mitigate potential impacts to historical resources, including maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation, relocation, or reconstruction of any impacted historic resource, which shall be conducted in a manner consistent with the Secretary of the Interior's Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings, as set forth in State California Environmental Quality Act (CEQA) Guidelines Section 15064.5(b)(3). When the above measures are not feasible or possible, the implementing agency shall secure a qualified architectural historian, or other such qualified person, to document any significant historical resource(s) by way of historic narrative, photographs, or architectural drawings, as mitigation for the effects of demolition of a historic resource. This work shall follow the general guidelines as described in the Historic American Building Survey (HABS), Historic American Engineering Record (HAER), or the Historical American Landscapes Survey (HALS). The appropriate level of recordation shall be established by the implementing agency based on the resource(s) that may be adversely affected by each project, including the number of copies to prepare and a list of designated recipients identified (e.g., local historical societies, museums, library branch, local government agency or department, and the SSJVIC). The report preparer shall contact the organizations identified and inquire whether (1) they are interested in receiving a copy of the documentation and, (2) if so, what format they prefer (e.g., a bound hard copy, a copy saved electronically and stored on a thumbdrive, or both). The implementing agency shall coordinate with the documentation preparer(s) and determine when the documentation package is finalized and deemed complete. A set number of copies and distribution or hosting the information on a website shall occur. The development of project-specific mitigation plans based on site and resource characteristics shall reduce potential impacts to the extent feasible.				
PMM CUL-3: Implementing agencies shall consider mitigation measures to reduce potential impacts related to the disturbance human remains, including those interred outside of formal cemeteries, as applicable and feasible: • Prior to issuance of grading permits for projects that contain known archaeological resources (or could potentially contain archaeological resources according to SSJVIC records), a Secretary of the Interior's Standards qualified and certified Registered Professional Archaeologist (RPA) (project archaeologist) shall be contracted to oversee archaeological monitoring of ground-disturbing. Ground-disturbing activities may include, but are not limited to, pavement removal, potholing or auguring, grubbing, boring, grading, excavation, drilling, and trenching. The project archaeologist, in consultation with the developer, shall develop an	Prior to issuance of grading permits and disturbing activities	Implementing Agency/Secretary of the Interior's Standards qualified and certified Registered Professional Archaeologist (RPA)	Implementing Agency	

Table B: Mitigation Monitoring and Reporting Program

Project-Specific Mitigation Measures (PMMs) and Fresno COG Mitigation Measures (FMMs)	Timing	Responsible Party	Monitoring Agency	Date Completed and Initials
Archaeological Monitoring Plan to address the details, timing, and responsibility of all archaeological and cultural activities that will occur on the project site. Details in the plan shall include: ○ Project grading and development scheduling. ○ Cultural resources sensitivity training requirement for all earthwork-related construction personnel ○ If applicable, the development of a rotating or simultaneous schedule in coordination with the project sponsor and the project archaeologist for designated Native American Tribal monitors, if any, during grading, excavation, and ground-disturbing activities on the site. ○ The safety requirements, duties, scope of work, and Native American Tribal monitors' authority to stop and redirect grading activities in coordination with all project archaeologists. ○ The protocols and stipulations that the developer, Tribes, and project archaeologist must follow in the event of inadvertent cultural resources discoveries, including any newly discovered cultural resource deposits that shall be subject to a cultural resources evaluation. ● The archaeological monitor shall maintain a daily log documenting, at a minimum, the identity of the monitor, the work monitored, and any cultural materials identified or other actions taken by the monitor. The monitoring logs shall be provided to the implementing agency upon request and may be shared with interested parties at the implementing agency's discretion. ● On-site monitoring shall end when the project site grading and excavation activities are completed, or when the monitor has indicated that the site has a low potential for archaeological resources.				
PMM CUL-4: Implementing agencies shall consider mitigation measures to reduce substantial adverse effects to prehistoric or historic-era subsurface archaeological features or deposits, as applicable and feasible: ● In the event that evidence of any prehistoric or historic-era subsurface archaeological features or deposits (e.g., ceramic shards, trash scatters, lithic scatters) are discovered during construction, all ground-disturbing activity within 50 meters (165 feet) of the discovery shall be halted until an RPA (project 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 project archaeologist determines that the find does not meet the Center for Regional Heritage Research standards of significance for cultural resources, construction may proceed. If the project 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	During construction and in the event that evidence of any prehistoric or historic-era subsurface archaeological features or deposits are found.	Implementing Agency/Project Sponsor/ Secretary of the Interior's Standards qualified and certified Registered Professional Archaeologist (RPA)	Implementing Agency	

Table B: Mitigation Monitoring and Reporting Program

Project-Specific Mitigation Measures (PMMs) and Fresno COG Mitigation Measures (FMMs)	Timing	Responsible Party	Monitoring Agency	Date Completed and Initials
significant by the project archaeologist (i.e., because the find is determined to constitute either a historical resource or a unique archaeological resource), the project 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 Department of Parks and Recreation (DPR) Primary Record forms (Form DPR 523) and location information to the appropriate California Historical Resources Information System office for the project area.				
4.6: Energy				
FMM EN-1: The Fresno COG shall encourage member agencies to increase the number of alternative fuel vehicles (i.e., vehicles not powered strictly by gasoline or diesel fuel) both in publicly owned vehicles, as well as those owned by franchisees of these agencies, such as trash haulers, green waste haulers, street sweepers, and curbside recyclable haulers.	Ongoing	Fresno COG	Fresno COG	N/A
FMM EN-2: The Fresno COG shall encourage member agencies to alter zoning to improve the jobs/housing balance, create communities where people live closer to work, and offer alternatives to personal automobile travel (bike, walk, and transit).	Ongoing	Fresno COG	Fresno COG	N/A
FMM EN-3: The Fresno COG shall encourage member agencies to streamline permitting and provide public information to facilitate accelerated construction of solar and wind power.	Ongoing	Fresno COG	Fresno COG	N/A
FMM EN-4: The Fresno COG shall encourage member agencies to adopt a "Green Building Program" to promote green building standards that go beyond minimum mandatory requirements, such as achieving California Green Building Standards Code (CALGreen) Tier 1 or Tier 2 measures. Green building standards include energy efficiency, usage of renewable resources, and reduced waste generation.	Ongoing	Fresno COG	Fresno COG	N/A
PMM EN-1: Implementing agencies shall consider mitigation measures to reduce impacts to the wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation, as applicable and feasible, as follows: ● Expanding light-duty vehicle retirement programs; ● Increasing commercial vehicle fleet modernization; ● Implementing driver training modules on fuel consumption; ● Replacing gasoline-powered mowers with electric mowers; ● Reducing idling from construction equipment; ● Incentivizing alternative fuel vehicles and equipment; ● Developing infrastructure for alternative-fueled vehicles; ● Implementing truck idling rules, devices, and truck-stop electrification;	During project construction and operation	Implementing Agency	Implementing Agency	

Table B: Mitigation Monitoring and Reporting Program

Project-Specific Mitigation Measures (PMMs) and Fresno COG Mitigation Measures (FMMs)	Timing	Responsible Party	Monitoring Agency	Date Completed and Initials
- Requiring electric truck refrigerator units; - Reducing locomotives' fuel use; - Modernizing older off-road engines and equipment; - Encouraging freight mode shift; - Limiting use of and developing fleet rules for construction equipment; and - Requiring zero-emission forklifts.				
PMM EN-2: Implementing agencies shall consider mitigation measures to reduce impacts to the wasteful, inefficient, or unnecessary consumption of energy resources, during construction bid solicitations, as applicable and feasible: Include the use of alternative formulations of cement and asphalt to the extent they are available at a reasonable cost in the marketplace. Solicitations shall include the recycling of construction waste and debris.	Prior to construction	Implementing Agency	Implementing Agency	
PMM EN-3: Implementing agencies shall consider mitigation measures to reduce impacts to the wasteful, inefficient, or unnecessary consumption of energy resources, during the design and approval, as applicable and feasible: - Lighting fixtures shall achieve energy reductions beyond an estimated baseline energy use for such lighting. - Light-emitting diode (LED) technology shall be used for all new or replaced traffic lights, rail signals, and other new development lighting features compatible with LED technology.	During project design	Implementing Agency	Implementing Agency	
4.7: Geology and Soils				
Refer to PMMs HYD-1 and HYD-2 as detailed in 4.10 Hydrology and Water Quality				
PMM GEO-1: Implementing agencies shall consider mitigation measures to reduce substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as applicable and feasible: - During project design and prior to construction of individual RTP/SCS projects, a qualified geologist shall be retained by the implementing agency to prepare a geotechnical investigation to establish site-specific geotechnical conditions, identify seismic and other geologic hazards, and develop appropriate project-specific recommendations to address those hazards. - The implementing agency shall incorporate the recommendations of the geotechnical investigation into project design and construction, as applicable.	Prior to project construction	Implementing Agency/ Qualified Geologist	Implementing Agency	
PMM GEO-2: Implementing agencies shall consider mitigation measures to reduce substantial adverse effects, including the risk of loss, injury, or death involving landslides, as applicable and feasible:	Prior to project construction	Implementing Agency/ Qualified Geologist	Implementing Agency	

Table B: Mitigation Monitoring and Reporting Program

Project-Specific Mitigation Measures (PMMs) and Fresno COG Mitigation Measures (FMMs)	Timing	Responsible Party	Monitoring Agency	Date Completed and Initials
Prior to construction of individual RTP/SCS projects, the implementing agency shall confirm that adequate slope drainage and appropriate landscaping are incorporated into project design to minimize the potential for slope instability and erosion.				
PMM GEO-3: Implementing agencies shall consider mitigation measures to reduce impacts related to the destruction of unique paleontological resources or unique geologic features, as applicable and feasible: - During environmental review, an implementing agency or designee shall conduct a project-specific records search at the appropriate Information Center to determine whether the project site has been previously evaluated for paleontological resources and whether any such resources have been identified. - If determined to be necessary based on the records search, implementing agencies shall retain a qualified paleontologist to conduct a field survey of the project site to assess potential impacts to paleontological resources. As part of this assessment, the qualified paleontologist shall identify and recommend appropriate avoidance, minimization, and/or mitigation measures.	During CEQA environmental review	Implementing Agency/Qualified Paleontologist	Implementing Agency	
4.8: Greenhouse Gas Emissions				
Refer to FMM EN-1 through EN-4 and PMMs EN-1 and EN-2 as detailed in 4.6 Energy.				
FMMs GHG-1: The Fresno Council of Governments (COG), in partnership with local air districts, shall continue to work with local jurisdictions to adopt qualified greenhouse gas (GHG) reduction plans (e.g., Climate Action Plans), develop GHG-reducing planning policies, and support local implementation of climate initiatives.	Ongoing	Fresno COG	Fresno COG	N/A
PMM GHG-1: Implementing agencies shall consider mitigation measures to reduce impacts related to the generation of greenhouse gas (GHG) emissions, as applicable and feasible: - Prior to approval of individual Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) projects, the project sponsor shall prepare and submit a technical assessment evaluating potential project-related GHG impacts. The evaluation shall be prepared in conformance with the San Joaquin Valley Air Pollution Control District (SJVAPCD) methodology. - If the Fresno Council of Governments (COG), Fresno COG member agencies, or SJVAPCD establish numeric thresholds of significance for evaluating the GHG emissions impact of a proposed project (i.e., California Environmental Quality Act [CEQA] qualified Greenhouse Gas Reduction Plan/Climate Action Plan or SJVAPCD project-specific GHG thresholds), the evaluation of project-related GHG emissions shall demonstrate consistency with those thresholds of significance.	Prior to project approval	Implementing Agency or Project Sponsor	Implementing Agency/ SJVAPCD/ Fresno COG	

Table B: Mitigation Monitoring and Reporting Program

Project-Specific Mitigation Measures (PMMs) and Fresno COG Mitigation Measures (FMMs)	Timing	Responsible Party	Monitoring Agency	Date Completed and Initials
- In the absence of project-specific GHG thresholds, projects shall demonstrate compliance with the newest version of the Scoping Plan's GHG requirements, consistent with State GHG emissions reduction and equity prioritization goals, by implementing the following design elements where feasible: - Projects shall not include natural gas appliances or natural gas plumbing. - Projects shall achieve a reduction in project-generated vehicle miles traveled (VMT) below the regional average consistent with the newest version of the Scoping Plan. - Projects shall not result in any wasteful, inefficient, or unnecessary electrical usage, as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the State CEQA Guidelines. - Projects shall comply with electric vehicle (EV) requirements in the most recently adopted version of California Green Building Standards Code (CALGreen) Tier 2. - Should a proposed project exceed established thresholds of significance, GHG emission reduction measures shall be implemented to reduce emissions below applicable thresholds or to a level commensurate with implementing the recommended project-design features outlined above. Such mitigation measures could include, but are not limited to, energy efficiency measures, water conservation and efficiency measures, solid waste measures, and transportation and motor vehicles measures. The identified measures shall be included as part of the conditions of approval.				
4.9: Hazards and Hazardous Materials				
Refer to PMM HYD-1 and HYD-2 as detailed in Section 4.10, Hydrology and Water Quality.				
Refer to PMM WILD-2 as described in Section 4.20, Wildfire.				
FMM HAZ-1: The Fresno Council of Governments (COG) shall work with the California Department of Transportation (Caltrans) and the California Highway Patrol to reduce risks associated with the transport of hazardous materials in the Fresno COG Region through its consultation role assisting in the development of routes designated for hazardous materials.	Ongoing	Fresno COG	Fresno COG	N/A
PMM HAZ-1: Implementing agencies shall consider the following mitigation measures to reduce substantial adverse effects related to the routine transport, use, or disposal of hazardous materials and hazardous materials releases, as applicable and feasible: - Prior to construction, a project-specific hazardous materials management plan shall be prepared to identify the types, quantities, storage locations, and handling procedures for hazardous materials used during construction. These plans would be implemented by the Construction Contractor during construction. - Prior to construction, coordination shall be conducted with local emergency response agencies (e.g., fire departments, emergency operations centers) to ensure adequate	Prior to project construction	Implementing Agency/ Construction Contractor	Implementing Agency	

Table B: Mitigation Monitoring and Reporting Program

Project-Specific Mitigation Measures (PMMs) and Fresno COG Mitigation Measures (FMMs)	Timing	Responsible Party	Monitoring Agency	Date Completed and Initials
emergency access, response planning, and integration of the project into existing emergency response plans. For projects involving substantial transport of hazardous materials (e.g., rail or highway corridors), coordination shall be conducted with local jurisdictions and emergency response providers prior to construction regarding the nature of materials transported and emergency contact procedures, consistent with applicable federal regulations (e.g., 49 Code of Federal Regulations Part 15).				
PMM HAZ-2: Implementing agencies shall consider the following mitigation measures to reduce significant hazards to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, as applicable and feasible: • A records review shall be performed during the environmental review of a project to determine whether there is existing permitted use of hazardous materials, or documented evidence of hazardous waste contamination, within the project site. • A Phase I Environmental Site Assessment (Phase I ESA) shall be completed during a project's environmental review when it includes any site with the potential for residual hazardous materials as a result of historical land uses or release. The Phase I ESA shall be prepared in conformance with the ASTM E1527-21 standard and shall include the following: ○ A review of federal, State, and local regulatory agency databases for hazardous materials sites; ○ A review of historical sources, including aerial photographs, fire insurance maps, and prior land use records; ○ A site reconnaissance to identify evidence of hazardous materials use, storage, or disposal; ○ Interviews with current and past owners, operators, or other knowledgeable persons, as available; ○ Identification of recognized environmental conditions (RECs), historical RECs, and controlled RECs; ○ Conclusions and recommendations regarding the need for further investigation, if applicable. • If recommended by the Phase I ESA a Phase II ESA report shall be prepared for the project prior to construction. The Phase II ESA shall make recommendations for remedial action, if appropriate, and be signed by a professional geologist or professional engineer. Recommendations provided in the Phase II ESA shall be implemented. • During design, the appropriate local, State, and federal environmental regulatory agencies shall be consulted to ensure sufficient minimization of risk to human health and	During project design and construction	Implementing Agency/California Occupational Safety and Health Administration (Cal/OSHA) Certified Asbestos Inspector/ Assessor/Cal/ OSHA-Certified Lead Inspector/ Assessor or certified Lead Supervisor/ Professional Geologist or Professional Engineer	Implementing Agency/California Department of Toxic Substances Control (DTSC), Regional Water Quality Control Board (RWQCB)/ SJVAPCD/ Environmental Protection Agency (EPA)/Fresno County Health Division/Certified Unified Program Agency (CUPA)/ Cal/OSHA	

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Project-Specific Mitigation Measures (PMMs) and Fresno COG Mitigation Measures (FMMs)	Timing	Responsible Party	Monitoring Agency	Date Completed and Initials
environmental resources has been implemented. Coordination shall include construction and post-construction considerations, and consider risk posed by soil contamination, groundwater contamination (including dewatering effluent), or other surface hazards such as underground storage tanks, fuel distribution lines, waste pits, and sumps. • During construction, work shall be stopped if soil, groundwater (including dewatering effluent), or other environmental medium with suspected contamination is encountered unexpectedly. Contamination could be identified by odor or visual staining, or if any underground storage tanks, abandoned drums, or other hazardous materials or wastes are encountered. The Construction Contractor shall secure the area and take all appropriate measures to protect human health and the environment, including, but not limited to, notification of regulatory agencies and identification of the nature and extent of contamination. Construction in the affected area shall be halted until appropriate measures have been implemented, consistent with the guidance of applicable regulatory authorities. • Soil generated by construction activities shall be stockpiled on site in a secure and safe manner. All contaminated soils determined to be hazardous or non-hazardous waste shall be adequately sampled by the Construction Contractor prior to acceptable reuse or disposal at an appropriate off-site location. Sampling, handling, and transport procedures for reuse or disposal shall be followed in accordance with applicable local, State, and federal laws and policies. • Groundwater (including dewatering effluent) pumped from the subsurface shall be evaluated for the presence of contaminants prior to discharge or disposal. If contamination is suspected or identified, groundwater shall be characterized in accordance with applicable State and federal hazardous waste regulations to determine appropriate handling, treatment, and disposal requirements. Groundwater pumped from the subsurface shall be contained on site in a secure and controlled manner to prevent releases to the environment and exposure to construction workers and the public. Contaminated groundwater, if identified, shall be managed, treated, and/or disposed of in accordance with applicable California Department of Toxic Substances Control (DTSC), RWQCB, and other regulatory agency requirements, including hazardous waste regulations, as appropriate. Engineering controls, including impermeable or vapor barriers, shall be installed to prevent groundwater-related contaminant movement and vapor intrusion into structures. • Prior to issuance of any demolition, grading, or building permit, the implementing agency (or other appropriate government agency) shall obtain written verification that the appropriate federal, State, and/or local oversight authorities have granted all required clearances and				

Table B: Mitigation Monitoring and Reporting Program

Project-Specific Mitigation Measures (PMMs) and Fresno COG Mitigation Measures (FMMs)	Timing	Responsible Party	Monitoring Agency	Date Completed and Initials
confirmed that all applicable standards, regulations, and conditions have been met for previous contamination at the site. - During construction, the Construction Contractor shall develop, train, and implement appropriate worker awareness and protective measures to ensure that worker and public exposure are minimized to an acceptable level and to prevent any further environmental contamination as a result of construction. - During project design, potential presence asbestos-containing materials (ACMs), lead-based paint (LBP), and any other building materials classified as hazardous waste by State or federal law shall be assessed for projects that include the demolition or modification of structures constructed prior to 1978. - If ACMs are present in building materials, the implementing agency shall retain a California Occupational Safety and Health Administration (Cal/OSHA) certified Asbestos Inspector/Assessor to prepare specifications for the removal, encapsulation, or enclosure of ACMs. These specifications shall be signed by the certified Inspector/Assessor and submitted to the implementing agency and any applicable local regulatory agencies prior to issuance of demolition or renovation permits and prior to commencement of construction activities that could disturb ACMs. The Construction Contractor shall implement the specifications during demolition or renovation. All ACM removal, encapsulation, or enclosure activities shall be conducted in accordance with applicable federal, State, and local laws and regulations, including, but not limited to: California Code of Regulations (CCR), Title 8 (Section 1529); California Business and Professions Code (BPC) Division 3, (Sections 7058.5, 7180-7189.6, and 7028.1); California Health and Safety Code Sections 25915–25919.7; and any other local regulations. In addition, a completed San Joaquin Valley Air Pollution Control District (SJVAPCD) Asbestos Notification Form shall be submitted at least 10 working days in advance, and all ACMs shall be removed and disposed of by an accredited contractor in accordance with SJVAPCD Rule 8021 (Asbestos NESHAP), the United States Environmental Protection Agency (EPA), Cal/OSHA, and other applicable federal, State, and local standards. - Where the remediation of LBP is required, the project sponsor shall retain Cal/OSHA-certified Lead Inspector/Assessor or certified Lead Supervisor, Project Monitor, or Project Designer to prepare specifications for the stabilization and/or removal of identified LBP. These specifications shall be submitted to the implementing agency and the appropriate local regulatory agency (e.g., Fresno County Environmental Health Division/Certified Unified Program Agency [CUPA]) prior to issuance of demolition or renovation permits and prior to commencement of construction activities that could disturb LBP. The Construction Contractor shall implement these specifications during demolition or renovation. All stabilization and/or				

Table B: Mitigation Monitoring and Reporting Program

Project-Specific Mitigation Measures (PMMs) and Fresno COG Mitigation Measures (FMMs)	Timing	Responsible Party	Monitoring Agency	Date Completed and Initials
removal activities shall be conducted in accordance with applicable laws and regulations, including, but not limited to: Cal/OSHA's Construction Lead Standard (CCR Title 8, Section 1532.1) and Department of Health Services regulations (17 CCR Sections 35001–36100), as may be amended. If other materials classified as hazardous waste by State or federal law are present, the project sponsor shall submit written confirmation to the appropriate local agency that all State and federal laws and regulations are being followed when profiling, handling, treating, transporting, and/or disposing of such materials.				
PMM HAZ-3: A project proposed within 0.25 mile of schools shall avoid the transport of hazardous materials when schools are in session, wherever feasible. When not feasible, notifications of the anticipated schedule of transport of such materials shall be provided to schools prior to construction.	During project design and construction	Implementing Agency	Implementing Agency	
PMM HAZ-4: Implementing agencies shall consider mitigation measures to reduce impacts to an adopted emergency response plan or emergency evacuation plan, as applicable and feasible: • Prior to construction, all necessary local and State road and railroad encroachment permits shall be obtained. All applicable conditions of approval shall be compiled and tracked for reference during project construction. If required as a permit condition, the Construction Contractor shall prepare a traffic control plan in accordance with professional engineering standards prior to construction. Traffic control plans shall include the following requirements: ○ Identification of all roadway locations where special construction techniques (e.g., directional drilling or nighttime construction) would be used to minimize impacts to traffic flow. ○ Development of circulation and detour plans to minimize impacts to traffic circulation. This may include the use of signing and flagging to guide vehicles through and/or around the construction zone. ○ Scheduling of truck trips outside of peak morning and evening commute hours to the maximum extent feasible. ○ Limiting lane closures during peak hours to the maximum extent feasible. ○ Use of designated haul routes to minimize truck traffic on local roadways to the maximum extent feasible. ○ Inclusion of detours for bicycles and pedestrians in all areas potentially affected by project construction. ○ Development of access plans for highly sensitive land uses such as police and fire stations, transit stations, hospitals, and schools prior to construction. The access plans will include input from the facility owner or administrator. To minimize disruption to emergency	Prior to construction	Implementing Agency/ Construction Contractor	Implementing Agency	

Table B: Mitigation Monitoring and Reporting Program

Project-Specific Mitigation Measures (PMMs) and Fresno COG Mitigation Measures (FMMs)	Timing	Responsible Party	Monitoring Agency	Date Completed and Initials
vehicles, the plans shall consider the timing, location, and duration of construction activities including detours and lane closures. Storage of construction materials only in designated areas.				
4.10: Hydrology and Water Quality				
PMM HYD-1: Implementing agencies shall consider mitigation measures to reduce project impacts that may violate water quality standards or waste discharge requirements, or otherwise substantially degrade surface water or groundwater quality, as applicable and feasible: - Prior to construction, the implementing agency shall require the project sponsor to retain a qualified civil engineer to prepare an erosion and sedimentation control plan for review and approval by the appropriate regulatory agency. Applicable BMPs shall include, but are not limited to, the following: - On sloped properties, the downhill end of the construction area shall be protected with perimeter control measures (e.g., silt fence, sandbags, filter fabric, silt curtains) and measures (e.g. hay bales) oriented parallel to the contours of the slope at a constant elevation to prevent erosion and limit sediment from entering streets, gutters, and storm drains. - In accordance with an approved erosion control plan, the Construction Contractor shall use mechanical and vegetative measures to reduce erosion and sedimentation, including appropriate seasonal maintenance. One hundred percent degradable erosion control fabric shall be installed on all graded slopes to protect and stabilize the slopes during construction and before permanent vegetation is established. All graded areas shall be temporarily protected from erosion by seeding with fast-growing annual species. All bare slopes shall be covered with staked tarps when rain is occurring or is expected. - The removal of natural vegetation or ground cover from the site shall be minimized during project design and construction to reduce the potential for erosion. Disturbed areas shall be stabilized with native vegetation as soon as possible. - During construction, filter materials shall be installed at storm drain inlets prior to the start of the wet weather season, site dewatering activities, street washing activities, and saw cutting asphalt or concrete. Filter materials shall be maintained and/or replaced, as necessary, to ensure effectiveness and prevent street flooding. - During construction, concrete/granite supply trucks or concrete/plaster finishing operations shall not be allowed to discharge wash water into watercourses, street gutters, or storm drains. - Tool and equipment cleaning locations shall be selected so that wash water does not discharge into the street, gutters, or storm drains.	Prior to construction	Implementing Agency/ Construction Contractor	Implementing Agency/RWQCB	

Table B: Mitigation Monitoring and Reporting Program

Project-Specific Mitigation Measures (PMMs) and Fresno COG Mitigation Measures (FMMs)	Timing	Responsible Party	Monitoring Agency	Date Completed and Initials
- The Construction Contractor shall provide a contained and covered area for storage of bags of cement, paints, flammables, oils, fertilizers, pesticides, or any other materials that could be discharged to a storm drain system by the wind or in the event of a material spill. - Construction debris shall be gathered on a regular basis and placed in a dumpster or other container that is emptied or removed on regular basis (interval approved by the implementing agency). When appropriate, tarps shall be used to collect fallen debris or splatters that could contribute to stormwater pollution. - During and following construction, dirt, gravel, refuse, and green waste shall be removed from sidewalks, street pavement, and storm drain systems within and near the project. - As appropriate, the Construction Contractor shall sweep street pavement adjacent to the project on a daily basis. Caked-on mud or dirt shall be scraped from these areas prior to sweeping. At the end of each workday, the entire site shall be cleaned and secured against potential erosion, dumping, or discharge to the street, gutter, and/or storm drains. - All erosion and sedimentation control measures installed during construction shall be in accordance with the control standards listed in the latest edition of the Erosion and Sediment Control Field Manual published by the Central Valley RWQCB. - During construction, all erosion and sedimentation control measures shall be monitored regularly by the Construction Contractor. If measures are insufficient to control sedimentation and erosion, the Construction Contractor, in coordination with the project sponsor, shall develop and implement additional and more effective measures immediately.				
PMM HYD-2: Implementing agencies shall consider mitigation measures to reduce project impacts that may violate water quality standards or waste discharge requirements, or otherwise substantially degrade surface water or groundwater quality, as applicable and feasible: - During project design, the implementing agency shall incorporate low impact development (LID) BMPs, infiltration BMPs, and hydromodification measures to mimic the natural hydrology of the site. These would maintain pre-project flow velocities/rates/volumes and retain/treat pollutants in stormwater runoff prior to discharge. Design elements may include, but are not limited to, the following: - New drainage channels/culverts; - Detention/retention basins; - Oil and grease traps; - Filter systems; - Vegetated buffers/median strips;	During project design	Implementing Agency/ Construction Contractor	Implementing Agency	

Table B: Mitigation Monitoring and Reporting Program

Project-Specific Mitigation Measures (PMMs) and Fresno COG Mitigation Measures (FMMs)	Timing	Responsible Party	Monitoring Agency	Date Completed and Initials
○ Incorporation of natural spaces; and ○ Wetland/riparian area restoration.				
4.11: Land Use and Planning				
PMM LU-1: The Fresno COG shall facilitate the exchange of information (e.g., geographic information system [GIS] shapefiles, demographic information, policy updates) that may be useful for member jurisdictions' reference for their planning documents and funding programs in timely updates.	Ongoing	Fresno COG	Fresno COG	N/A
FMM LU-1: Implementing agencies shall consider mitigation measures to reduce project impacts that may conflict with an applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, as applicable and feasible: During project design, each implementing agency shall protect access to existing community facilities and minimize existing and proposed barriers to pedestrians and bicyclists. Community facilities shall be identified, and public access shall be considered. New or expanded pedestrian and bicycle routes connecting to community facilities shall be considered to improve community connectivity.	Ongoing	Fresno COG	Fresno COG	N/A
4.12: Mineral Resources				
PMM MIN-1: Implementing agencies shall consider mitigation measures to reduce the loss of availability of a known mineral resource, as applicable and feasible: ● During construction, the Construction Contractor shall recycle and reuse building materials resulting from demolition, particularly aggregate and asphalt materials, to the maximum extent practicable. ● During construction, the Construction Contractor shall identify and use recycled building materials, particularly aggregate materials, from other construction sites within a reasonable hauling distance of the project, where feasible. ● During project design, the implementing agency shall evaluate the use of buffer zones or screening to reduce potential conflicts with adjacent or nearby mineral resource extraction areas. ● During project planning and design, the implementing agency shall evaluate and select project sites and design features (e.g., buffers) to avoid or minimize impacts on known mineral resources and mineral resource recovery sites. To the extent feasible, projects shall be sited to maintain portions of Mineral Resource Zone 2 (MRZ-2) in open space or other general plan land use designations and zoning that allow for mineral resource extraction.	During project construction	Implementing Agency/ Construction Contractor	Implementing Agency	

Table B: Mitigation Monitoring and Reporting Program

Project-Specific Mitigation Measures (PMMs) and Fresno COG Mitigation Measures (FMMs)	Timing	Responsible Party	Monitoring Agency	Date Completed and Initials
4.13: Noise				
PMM NOI-1: Implementing agencies shall consider mitigation measures to reduce construction noise impacts to levels at or below those established in the General Plan Noise Ordinance or other applicable standards (such as the Federal Transit Administration [FTA] construction noise criteria), as applicable and feasible: • The Construction Contractor shall limit project construction activities to the permitted hours of construction in accordance with local jurisdiction regulations in the applicable general plan noise element or noise ordinance. • The Construction Contractor shall erect a minimum 10-foot-high temporary construction barrier between project construction activities and noise-sensitive land uses when construction noise is predicted to exceed local or project-specific noise thresholds or during high-noise activities. The barrier shall be continuous with no gaps or holes and may be constructed of any material with a minimum Sound Transmission Class (STC) rating of 28. • To the extent feasible, the Construction Contractor shall schedule heavy construction activities generating high noise levels, such as the use of bulldozers, scrapers, graders, and pile driving, to the least noise-sensitive hour of the day. • To the extent feasible, the Construction Contractor shall implement pile driving alternatives to minimize construction noise impacts. These include, but are not limited to, pre-drilling and cast-in-drill-hole (CIDH). • The Construction Contractor shall stage all stationary construction equipment as far from noise-sensitive receptors as feasible. • To the extent feasible, construction-related traffic shall be routed away from streets with noise-sensitive land uses, including residences, or to streets with the fewest noise-sensitive land uses. • The Construction Contractor shall ensure that all construction equipment is properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds, whenever feasible). All intake and exhaust ports on power equipment shall be muffled or shielded. • To the extent feasible, the Construction Contractor shall use hydraulically or electrically powered tools (e.g., jack hammers, pavement breakers, and rock drills). • The Construction Contractor shall post the construction schedule, noise complaint procedures, and project contact information in a publicly accessible location for reference in the event of a noise disturbance.	During project construction	Implementing Agency/ Construction Contractor	Implementing Agency	

Table B: Mitigation Monitoring and Reporting Program

Project-Specific Mitigation Measures (PMMs) and Fresno COG Mitigation Measures (FMMs)	Timing	Responsible Party	Monitoring Agency	Date Completed and Initials
PMM NOI-2: Implementing agencies shall consider mitigation measures to reduce potential stationary noise impacts, as applicable and feasible: - During project design of individual RTP/SCS projects, the implementing agency shall require the project sponsor to retain a qualified acoustical consultant to prepare a project-level noise study to assess potential stationary noise impacts from transportation and land development projects. The study shall be prepared in accordance with the applicable guidelines, procedures, and requirements. It shall determine whether project noise levels would result in a substantial permanent increase in ambient noise levels exceeding standards established in the local general plan or noise ordinance, or applicable standards of other agencies. Further, the study shall recommend avoidance, minimization, and/or mitigation measures to reduce noise levels to the extent feasible. Noise reduction measures may include, but are not limited to: - Locating stationary noise sources on the site to be shielded by structures (e.g., buildings, enclosures, or soundwalls); and - Using equipment with lower noise emission ratings.	During project design	Implementing Agency/ Qualified Acoustical Consultant	Implementing Agency	
PMM NOI-3: Implementing agencies shall consider mitigation measures to reduce to reduce excessive groundborne vibration or groundborne noise levels during construction, as applicable and feasible: - Heavy construction (e.g., pile driving, blasting, large bulldozers, and loaded trucks) shall be restricted or the use of light construction equipment (e.g., pre-drilling, CIDH, small bulldozers and trucks) shall be required at a distance from off-site building structures that avoids potential damage and minimizes annoyance to the extent feasible. - Loaded trucks shall be routed away from residential streets or select streets with the fewest homes to the extent feasible.	During project construction	Implementing Agency/ Construction Contractor	Implementing Agency	
PMM NOI-4: Implementing agencies shall consider mitigation measures to reduce operational vibration levels, as applicable and feasible: The implementing agency shall ensure implementation of applicable mitigation procedures provided in Table 4.13.N of this Program Environmental Impact Report (PEIR) to reduce operational vibration levels. Mitigation may occur at the source, along the propagation path, or at the receiver. If the mitigation procedures listed in Table 4.13.N are not feasible at certain properties, the implementing agency shall attempt to negotiate a vibration easement with affected property owners or, where feasible, consider relocation of sensitive receptors outside the area subject to significant vibration impacts.	During project operation	Implementing Agency/ Construction Contractor	Implementing Agency	

Table B: Mitigation Monitoring and Reporting Program

Project-Specific Mitigation Measures (PMMs) and Fresno COG Mitigation Measures (FMMs)	Timing	Responsible Party	Monitoring Agency	Date Completed and Initials
Table 4.13.N: Potential Vibration Mitigation Procedures and Descriptions				
Mitigation Procedure	Location of Mitigation	Description		
Maintenance	Source	Rail condition monitoring systems with rail grinding on a regular basis. Wheel truing to re-contour the wheel, provide a smooth running surface, and remove wheel flats. Reconditioning vehicles. Installing wheel condition monitoring systems.		
Location and Design of Special Trackwork	Source	Careful review of crossover and turnout locations during the preliminary engineering stage. When feasible, relocate special trackwork to a less vibration-sensitive area. Installation of spring frogs eliminates gaps at crossovers and helps reduce vibration levels.		
Vehicle Suspension	Source	Rail vehicle should have a low unsprung weight, soft primary suspension, minimum metal-on-metal contact between moving parts of the truck, and smooth wheels that are perfectly round.		
Special Track Support Systems	Source	Floating slabs, resiliently supported ties, high-resilience fasteners, resilient sub-roadbed materials, and ballast mats all help reduce vibration levels from the track support system.		
Building Modifications	Receiver	For existing buildings, if vibration-sensitive equipment is affected by train vibration, the floor upon which the vibration-sensitive equipment is located could be stiffened and isolated from the remainder of the building. For new buildings, the building foundation should be supported by elastomer pads that are similar to bridge-bearing pads.		

Table B: Mitigation Monitoring and Reporting Program

Project-Specific Mitigation Measures (PMMs) and Fresno COG Mitigation Measures (FMMs)				Timing	Responsible Party	Monitoring Agency	Date Completed and Initials
	Trenches	Along Vibration Propagation Path	A trench can be an effective vibration barrier if it changes the propagation characteristics of the soil. It can be open or solid. Open trenches can be filled with Styrofoam. Solid barriers can be constructed with sheet piling. Rows of drilled shafts can be filled with either concrete or a mixture of soil and lime, or concrete poured into a trench.				
	Operational Changes	Source	Reduce vehicle speed. Adjust nighttime schedules to minimize train movements during sensitive hours. Operating restrictions require continuous monitoring and may not be practical.				
	Buffer Zones	Receiver	Negotiate a vibration easement from the affected property owners or expand the rail right-of-way.				
Source: Federal Railroad Administration. 2012. <i>High-Speed Ground Transportation Noise and Vibration Assessment</i> .							
4.14: Population and Housing							
FMM POP-1: Implementing agencies shall consider mitigation measures to reduce impacts related to the displacement of a substantial number of people, as applicable and feasible: During construction of individual RTP/SCS projects, the implementing agency shall require the Construction Contractor to prepare a construction schedule designed to minimize potential neighborhood disruption associated with prolonged construction activity. The schedule shall be submitted to the implementing agency or designated reviewing authority for review and approval.				Ongoing	Fresno COG	Fresno COG	N/A
PMM POP-1: The implementing agencies for each individual future transportation improvement and land use development project facilitated by the proposed project shall require that a construction schedule be developed that minimizes potential neighborhood deterioration from protracted waiting periods.				During project design	Implementing Agency	Implementing Agency	

Table B: Mitigation Monitoring and Reporting Program

Project-Specific Mitigation Measures (PMMs) and Fresno COG Mitigation Measures (FMMs)	Timing	Responsible Party	Monitoring Agency	Date Completed and Initials
PMM POP-2: Implementing agencies shall consider mitigation measures to reduce impacts related to the displacement of a substantial number of people, as applicable and feasible: Individual RTP/SCS projects with the potential to displace homes and businesses shall require implementing agencies to evaluate alternative alignments and transportation facility designs early in the design process to minimize displacement.	During project design	Implementing Agency	Implementing Agency	
4.15: Public Services				
Refer to PMM LU-1 as detailed in Section 4.11, Land Use and Planning.				
4.16: Recreation				
No mitigation measures are applicable.				
4.17: Transportation and Traffic				
FMM TRAN-1: Fresno COG will continue to engage State agencies in developing such policies/program while implementing the following regional/local implementation measures: - Fresno COG will continue to secure funding for active transportation projects to fund more bike/pedestrian projects in the Fresno County region. - Fresno COG will encourage and support the local jurisdictions to grow more sustainably by building more infill, compact and mixed uses development. - Fresno COG will work with transit agencies in Fresno County to secure funding to expand transit services and improve the efficiency of the transit system. - Fresno COG will continue to support and encourage transit-oriented development through various funding programs. - Fresno COG will continue to support grant applications to state-wide funding programs such as the Affordable Housing and Sustainable Communities (AHSC), the Transit-Oriented Development (TOD) Housing Program, etc. - Fresno COG will continue to work with the transit agencies and the local governments to implement micro transit, mobility hubs, and micro-grid system in Fresno County. - Fresno COG will encourage transit agencies and local governments to implement first mile/last mile strategies to provide connection to the transit service. - Fresno COG will encourage local to explore the Missing Middle Housing issue, and develop mechanisms to fill the gap of such housing types to meet the affordable housing needs. - Fresno COG will continue to incentivize carpooling and vanpooling to reduce total VMT in the region. - Fresno COG will continue to support safe route to school programs/projects. - Fresno COG will continue to work with the San Joaquin Valley Air Pollution Control District (the Air District) to implement Rule 9410, which requires major employers in the region to provide employees with alternative to private automobiles as commute method.	Ongoing	Fresno COG	Fresno COG	N/A

Table B: Mitigation Monitoring and Reporting Program

Project-Specific Mitigation Measures (PMMs) and Fresno COG Mitigation Measures (FMMs)	Timing	Responsible Party	Monitoring Agency	Date Completed and Initials
- Fresno COG will continue to provide support for the implementation of SB 743 by providing technical support for local agencies and the private sector. - Fresno COG will explore the implementation of a regional VMT mitigation program. - Fresno COG will explore the feasibility of managed lanes in the region. - Fresno COG will work with the transit agencies and local governments to provide more efficient demand-response services. - Fresno COG will encourage local governments to develop and implement Complete Street policies to facilitate more bike and walk trips. - Fresno COG will continue to support efforts to provide shades to transit riders and pedestrians by building more bus shelters and planting more trees along sidewalks.				
PMM TRAN-1: Prior to approval of individual RTP/SCS projects, the project sponsor shall consider preparation of a safety analysis as needed for locations where sight lines could be impeded or other potential safety hazards are present. If prepared, the safety analysis shall be prepared according to the jurisdiction's applicable Municipal Code requirements and the Caltrans Highway Design Manual (HCM) standards and guidelines. Depending on the outcome of the safety analysis, the implementing agency shall consider safety improvements to reduce substantial adverse effects, as applicable and feasible, such as the following: - Limited use areas (e.g., low-height landscaping); - On-street parking restrictions (e.g., red curb); and - Turning restrictions (e.g., right in/right-out).	Prior to approval of individual RTP/SCS projects	Project Sponsor	Implementing Agency	
4.18: Tribal Cultural Resources				
Refer to PMMs CUL-1, CUL-3, and CUL-4 as detailed in Section 4.5, Cultural Resources.				
4.19: Utilities and Service Systems				
Refer to PMM HYD-1 and HYD-2 as detailed in Section 4.10, Hydrology and Water Quality.				
PMM UTIL-1: Implementing agencies for a project shall consider mitigation measures to ensure adequate capacity and availability of utility and service systems, as applicable and feasible. Such utilities and services include, but are not limited to, water supply, wastewater treatment, stormwater drainage, electric power, natural gas, and telecommunications systems, as applicable and feasible: During the environmental review for individual RTP/SCS projects, implementing agencies shall ensure the provision of adequate utilities, including water supply, wastewater treatment, stormwater drainage, electric power, natural gas, and telecommunication systems, to avoid or reduce significant environmental impacts associated with the construction or expansion of such facilities. Projects requiring wastewater service, solid waste collection, or potable water service shall coordinate with the relevant local agencies to confirm that existing public services and	During the CEQA review	Implementing Agency	Implementing Agency	

Table B: Mitigation Monitoring and Reporting Program

Project-Specific Mitigation Measures (PMMs) and Fresno COG Mitigation Measures (FMMs)	Timing	Responsible Party	Monitoring Agency	Date Completed and Initials
utilities can accommodate the anticipated demand. If the current infrastructure serving an individual RTP/SCS project is inadequate, necessary infrastructure improvements shall be identified in the CEQA documentation for that individual project. Environmental impacts associated with the construction or expansion of utility infrastructure shall be avoided or minimized by adopting conditions of approval that must be followed by those responsible for construction or expansion activities.				
PMM UTIL-2: Implementing agencies for a project shall consider mitigation measures to ensure sufficient water supplies, as applicable and feasible: • During design individual RTP/SCS projects, coordination shall be conducted with relevant water service providers to ensure existing water supplies can accommodate the increase in demand. If any water service provider servicing the project site has inadequate water supply, improvements and/or mitigation measures shall be identified in each project's CEQA documentation. • Projects shall reduce the use of potable water for landscape irrigation. Project design shall include drought-tolerant plantings for landscaping, water-efficient irrigation systems, and rainwater capture infrastructure, where feasible. • Project design shall specify drip or other water-conserving or weather-based irrigation systems for landscaping. • Project design shall incorporate elements that reduce the use of potable water, including water-conserving fixtures such as low-flow toilets, water-efficient clothes washers, reduced-flow faucets, and EnergyStar-rated appliances. • Project design shall incorporate the use of reclaimed water for non-potable uses, such as landscape irrigation, ornamental water features, concrete mixing, and dust control, when located in an area with existing reclaimed water conveyance infrastructure. For projects areas with planned reclaimed water service, design shall specify dual plumbing systems in anticipation of future reclaimed water use.	During project design	Implementing Agency	Implementing Agency/ Applicable water service providers	
PMM UTIL-3: The implementing agency for a project shall consider mitigation measures to reduce the generation of solid waste, as applicable and feasible: • Maintenance or reuse of existing building structures and materials associated with proposed building renovations and redevelopment shall be incorporated into the project to the extent feasible. • Construction waste shall be diverted from landfills, where feasible, through the following measures: ○ A construction waste management plan shall be implemented that identifies materials to be diverted from disposal.	During project construction	Implementing Agency	Implementing Agency/ Applicable solid waste service providers	

Table B: Mitigation Monitoring and Reporting Program

Project-Specific Mitigation Measures (PMMs) and Fresno COG Mitigation Measures (FMMs)	Timing	Responsible Party	Monitoring Agency	Date Completed and Initials
- Salvaged, refurbished, or reused materials shall be used, where practicable, to divert such items from landfills. - Diversion targets for construction waste shall be established and met.				
4.20: Wildfire				
Refer to PMM HAZ-4 as detailed in Section 4.9, Hazards and Hazardous Materials.				
FMM WILD-1: The Fresno COG shall continue to provide a regional forum for collaboration in planning, communication, and information sharing on best practices around wildfire resilience.	Ongoing	Fresno COG	Fresno COG	N/A
PMM WILD-1: Implementing agencies shall consider the following mitigation measures to reduce wildfire risk, as applicable and feasible: - Structures proposed in high-fire-hazard areas shall be designed and constructed in accordance with applicable State and federal fire safety standards to improve survivability and allow for shelter-in-place, where appropriate. - During project design, improvements to roadway access and circulation shall be considered to support emergency response and safe evacuation. - During project design, defensible space requirements shall be incorporated to reduce flammable vegetation, debris, and combustible materials near structures. - Fire protection features, such as exterior sprinkler systems with independent water sources, shall be incorporated during project design. - Where feasible, distributed energy resources (e.g., solar with battery storage) shall be incorporated during project design to reduce reliance on overhead electrical infrastructure. - Project design shall comply with any existing fire protection plans in high-fire-hazard areas. - Fire-resistant features shall be incorporated into the design of development project proposed in fire-prone areas, including ember-resistant vents and fire-resistant roofing materials.	During project design	Implementing Agency/ Construction Contractor	Implementing Agency	
PMM WILD-2: Implementing agencies shall consider the following mitigation measures to reduce fire risk related to the installation or maintenance of associated infrastructure, as applicable and feasible: Individual RTP/SCS projects located within Very High Hazard Severity Zones or State Responsibility Areas (SRAs) shall prepare a Construction Fire Prevention Plan prior to initiation of construction. A draft copy of the plan shall be provided to the California Public Utilities Commission (CPUC) and State and local fire agencies at least 90 days before the start of any construction activities in areas designated as Very High or High Fire Hazard Severity Zones. The plan shall also include federal, State, or local agencies with jurisdiction over areas where the project is located. The final plan shall be approved by the CPUC at least 30 days prior to the initiation of construction activities. The plan shall be fully implemented throughout the construction period and include the following:	During project design and construction	Implementing Agency/ Construction Contractor/Fire Marshal or similar qualified position	Implementing Agency/California Public Utilities Commission (CPUC)/ Fire Marshal or similar qualified position	

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Project-Specific Mitigation Measures (PMMs) and Fresno COG Mitigation Measures (FMMs)	Timing	Responsible Party	Monitoring Agency	Date Completed and Initials
• The purpose and applicability of the plan. • Responsibilities and duties. • Preparedness training and drills. • Procedures for fire reporting, response, and prevention that include: ○ Identification of daily site-specific risk conditions ○ The tools and equipment needed on vehicles and to be on hand at sites ○ Reiteration of fire prevention and safety considerations during tailboard meetings ○ Daily monitoring of the red-flag warning system with appropriate restrictions on types and levels of permissible activity ○ Coordination procedures with federal and local fire officials ○ Crew training, including fire safety practices and restrictions ○ Method(s) for verifying that all plan protocols and requirements are being followed • A project Fire Marshal or similar qualified position shall be established to enforce all provisions of the Construction Fire Prevention Plan as well as to perform other duties related to fire detection, prevention, and suppression for the project. Construction activities shall be monitored to ensure implementation and effectiveness of the plan.				

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5.0 REFERENCES

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