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memorandum

date July 20, 2010

to Vince Harris, StanCOG Executive Director
Jaylen French, Associate Planner

from Brian Grattidge, Project Manager
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subject Errata to StanCOG Regional Transportation Plan 2011 FEIR (dated July 2010)

The following errata to the StanCOG Regional Transportation Plan 2011 Final Environmental Impact Report (FEIR) has been prepared to address the discussions that StanCOG has had with the California Office of the Attorney General specific to air quality and climate change issues. None of the revisions to the EIR identified below raise any "significant new information" within the meaning of Public Resources Code Section 21092.1 or CEQA Guidelines Section 15088.5. The new information to the EIR is intended merely to clarify, amplify, and makes modifications and does not change the impact conclusions that were made in the Draft EIR.

Revisions to the Draft EIR

2. Introduction

The following information regarding the use of this EIR to facilitate future tiering the last paragraph under Section 2.2.7 "Subsequent Review Under CEQA" (page 2-6 of the Draft EIR) is modified as followed:

The program EIR provides a framework for future analysis. Some future projects may be found to be within the scope of this program EIR pursuant to CEQA Guidelines, Section 15168(c)(2). When an initial study or other analysis finds that a later project may cause a significant effect on the environment that was not adequately addressed in the program EIR, an EIR or negative declaration may be "tiered" off of the EIR, pursuant to CEQA Guidelines, Section 15152. The lead agency for a later project consistent with the program should limit the subsequent EIR or negative declaration to effects which: (1) were not examined as significant effects on the environment in the prior EIR; or (2) are susceptible to substantial reduction or avoidance by the choice of specific revisions in the project, by the imposition of conditions or means.

The 2011 RTP EIR air quality analysis has specific limitations in the air quality analysis that should be considered when making a determination that a project is within the scope of the program EIR or when tiering from it. The 2011 RTP EIR analyzes cumulative air emissions in the buildout scenario for 2035. This approach may underestimate the project-specific impacts of individual projects, particularly with regards to ozone precursors. In

addition, potential impacts related to toxic air contaminants (TACs), while discussed in Chapter 4.6, where not analyzed for individual projects, due to the site specific nature of TAC effects. An initial study or other analysis should be prepared for each project, as applicable, to determine the project's impact on ozone and TACs within the study area.

4.1 Energy and Climate Change

The following note is added to Table 4.1-3:

2035 emissions do not include reductions in vehicle operational emissions resulting from implementation of AB 1493 (2002, Pavley). Therefore, actual 2035 emissions are anticipated to be less than those shown in the table. Standards approved by the California Air Resources Board may result in up to a 30% reduction of emissions in the 2016 vehicle fleet compared to the 2002 fleet.

On page 4.1-29, page 1-4 (of the Executive Summary), and page A-2 of the Mitigation Monitoring Program (see Attachment A to this Errata), Mitigation Measure 4.1.5 is revised as follows:

Measure 4.1.5. StanCOG shall develop actions and policies to reduce regional GHG emissions from the transportation sector. ~~These actions and policies will support the development of a Sustainable Communities Strategy (SCS) and are intended to meet the regional GHG reductions targets established consistent with SB 375.~~ Specific actions and policies include the following:

- ~~Capitalize on the Regional Blueprint planning process to develop land use policies that encourage mixing of uses, higher densities, and more accessibility to transit.~~
- ~~Upgrade the available transportation modeling tools to ensure that they adequately capture the effects of smart growth policies and new land use patterns on travel behavior.~~
- ~~Facilitate regional funding efforts to assist local agencies in developing and implementing smart growth land use and transportation plans.~~
- ~~Prepare a set of principles for site design and street design that would support sustainable development patterns and that could be transferable between local jurisdictions.~~
- ~~Engage local, regional and State stakeholders and decision-makers in the SCS development process.~~

1. Develop a Sustainable Communities Strategy (SCS) in compliance with SB 375 prior to the adoption of the next RTP. Within one year from the adoption of the RTP, StanCOG will undertake the following: StanCOG will work with the local jurisdictions and transit operators with Stanislaus County to develop countywide land use scenarios that reflect different population distributions and land use (mix and density), and multimodal transportation strategies, utilizing the StanCOG regional travel demand model in coordination with a rapid fire tool similar to I-Places. Scenarios will be developed to identify the alternatives that demonstrate potential reductions in vehicle miles traveled (VMT) and total vehicle miles; GHG, conventional and toxic air pollutant emissions; long distance commute trips, and other such factors discussed in the RTP and EIR as the StanCOG Board thinks advisable consistent with state and federal law.

   Coordination with local agencies currently in the development process of local climate action plans or general plan updates are important for consistency purposes. The schedule identified to develop alternative scenarios should be flexible to allow incorporation of these planning efforts into the regional scenario development effort.

Public participation in this process is important to StanCOG and will be incorporated into the scenario development process identified above.

2. Upon completion of the scenario development exercise above, StanCOG will use the data from this exercise as well as public input to develop a multimodal transportation strategy that when combined with land use demonstrates the most potential to meet the following goals: reductions in vehicle miles traveled (VMT) and total vehicle miles; GHG, conventional and toxic air pollutant emissions; long distance commute trips and other such factors discussed in the RTP and EIR as the COG Board thinks advisable consistent with state and federal law. This strategy may be one of the scenarios developed in 1 above or may be a hybrid scenario.
3. The resulting multimodal transportation strategy from 2 above will be presented to the StanCOG Board as an update to the 2011 RTP, for approval or disapproval by the Board subject to all applicable federal and state laws.

4.6 Air Quality

The following background information regarding ozone is inserted following the last paragraph on page 4.6-2:

The most severe air quality problem in the Air Basin is the high level of ozone. Ozone occurs in two layers of the atmosphere. The layer surrounding the earth's surface is the troposphere. Here, ground level, or "bad" ozone, is an air pollutant that damages human health, vegetation, and many common materials. It is a key ingredient of urban smog. The troposphere extends to a level about 10 miles up, where it meets the second layer, the stratosphere. The stratospheric, or "good" ozone layer, extends upward from about 10 to 30 miles and protects life on earth from the sun's harmful ultraviolet rays.

"Bad" ozone is what is known as a photochemical pollutant. It needs reactive organic gases (ROG), NOx, and sunlight. ROG and NOx are emitted from various sources throughout Stanislaus County. In order to reduce ozone concentrations, it is necessary to control the emissions of these ozone precursors.

Significant ozone formation generally requires an adequate amount of precursors in the atmosphere and several hours in a stable atmosphere with strong sunlight. High ozone concentrations can form over large regions when emissions from motor vehicles and stationary sources are carried hundreds of miles from their origins.

Ozone is a regional air pollutant. It is generated over a large area and is transported and spread by wind. Ozone, the primary constituent of smog, is the most complex, difficult to control, and pervasive of the criteria pollutants. Unlike other pollutants, ozone is not emitted directly into the air by specific sources. Ozone is created by sunlight acting on other air pollutants (called precursors), specifically NOx and ROG. Sources of precursor gases to the photochemical reaction that form ozone number in the thousands. Common sources include consumer products, gasoline vapors, chemical solvents, and combustion products of various fuels. Originating from gas stations, motor vehicles, large industrial facilities, and small businesses such as bakeries and dry cleaners, the ozone-forming chemical reactions often take place in another location, catalyzed by sunlight and heat. High ozone concentrations can form over large regions when emissions from motor vehicles and stationary sources are carried hundreds of miles from their origins. Approximately 50 million people lived in counties with air quality levels above the EPA's health-based national air quality standard in 1994. The highest levels of ozone were recorded in Los Angeles, closely followed by the San Joaquin Valley. High levels also persist in other heavily populated areas, including the Texas Gulf Coast and much of the Northeast.

While the ozone in the upper atmosphere absorbs harmful ultraviolet light, ground-level ozone is damaging to the tissues of plants, animals, and humans, as well as to a wide variety of inanimate materials such as plastics, metals, fabrics, rubber, and paints. Societal costs from ozone damage include increased medical costs, the loss of human and animal life, accelerated replacement of industrial equipment, and reduced crop yields.

Health Effects of Ozone

While ozone in the upper atmosphere protects the earth from harmful ultraviolet radiation, high concentrations of ground-level ozone can adversely affect the human respiratory system. Many respiratory ailments, as well as cardiovascular disease, are aggravated by exposure to high ozone levels. Ozone also damages natural ecosystems, such as: forests and foothill communities; agricultural crops; and some man-made materials, such as rubber, paint, and plastic. High levels of ozone may negatively affect immune systems, making people more susceptible to respiratory illnesses, including bronchitis and pneumonia. Ozone accelerates aging and exacerbates pre-existing asthma and bronchitis and, in cases with high concentrations, can lead to the development of asthma in active children. Active people, both children and adults, appear to be more at risk from ozone exposure than those with a low level of activity. Additionally, the elderly and those with respiratory disease are also considered sensitive populations for ozone.

People who work or play outdoors are at a greater risk for harmful health effects from ozone. Children and adolescents are also at greater risk because they are more likely than adults to spend time engaged in vigorous activities. Research indicates that children under 12 years of age spend nearly twice as much time outdoors daily than adults. Teenagers spend at least twice as much time as adults in active sports and outdoor activities. In addition, children inhale more air per pound of body weight than adults, and they breathe more rapidly than adults. Children are less likely than adults to notice their own symptoms and avoid harmful exposures.

Ozone is a powerful oxidant—it can be compared to household bleach, which can kill living cells (such as germs or human skin cells) upon contact. Ozone can damage the respiratory tract, causing inflammation and irritation, and it can induce symptoms such as coughing, chest tightness, shortness of breath, and worsening of asthmatic symptoms. Ozone in sufficient doses increases the permeability of lung cells, rendering them more susceptible to toxins and microorganisms. Exposure to levels of ozone above the current ambient air quality standard leads to lung inflammation and lung tissue damage and a reduction in the amount of air inhaled into the lungs.

The standards for Ozone are not currently being met in the SJVAB for federal and state standards.

The following text regarding conformance with State air quality standards is inserted following the second paragraph (from top of page) on page 4.6-9:

The SJVAPCD is one of 35 air quality management districts that have prepared air quality management plans to accomplish a five percent annual reduction in emissions documenting progress toward achievement of the state ambient air quality standards. The SJVAPCD air quality management plans document required emissions reductions from all emissions sources, mobile and stationary. For this analysis, only on-road mobile source emissions are considered, as the 2011 RTP does not impact the implementation of any SJVAPCD regulations or incentives on other emissions source categories. As such, this analysis will not show the entire five percent reductions required by each of the SJVAPCD plans (for each applicable pollutant), but, will show the on-road mobile source share of the five percent per year reductions resulting from each of the SJVAPCD Plans . Required reductions from all other emissions sources can be found in the applicable SJVAPCD Plan.

The 2011 RTP demonstrates compliance with the list of comprehensive regulatory and incentive based measures contained in each plan by demonstrating that motor vehicle emissions resulting from the 2011 RTP are less than specified motor vehicle emissions "budgets" contained in the applicable SJVAPCD plan (2007 PM10 Maintenance Plan, which relies on the 2003 PM10 Plan for emissions reductions measures) on-road mobile source ozone precursor emissions [reactive organic gas (ROG) and Nitrogen Oxide (NOx)]. To document compliance with the state air quality standards, each of these SJVAPCD plans identifies specific years in which progress toward attainment of the standard must be measured.

Each of the SJVAPCD plans (2007 PM10 Maintenance Plan, which relies on the 2003 PM10 Plan for emissions reductions measures) identifies a "budget" for measuring progress toward achieving attainment of the national and state air quality standard. A "budget" is, in effect, an emissions "threshold" or "not to exceed value" for specific years in which progress toward attainment of the standard must be measured. These specific years can also be described as "budget years" and are established to ensure achievement of the "budget" to demonstrate continued progress toward attainment of the national air quality standard. The term "base year" also reflects a "threshold" or "not to exceed" value against which future emissions from the 2011 RTP are measured.

The conformity regulation (Section 93.118[b] and [d]) requires documentation of the "budget years" for which consistency with motor vehicle emission "budgets" must be shown. In addition, any interpolation performed to meet tests for "budget years" in which specific analysis is not required need to be documented. For the selection of the analysis years, the conformity regulation requires: (1) that if the attainment year is in the time span of the transportation plan, it must be modeled; (2) the last year forecast in the transportation plan must be an analysis year; and (3) analysis years may not be more than ten years apart. In addition, the conformity regulation requires that conformity must be demonstrated for each "budget year." It is important to note, that although the conformity regulation requires modeling of several analysis years in addition to the "budget years," those additional analysis years must demonstrate that emissions in those years are less than the applicable motor vehicle emissions "budget." For example the 2011 RTP this analysis models PM10 motor vehicle emissions from the 2011 RTP in the years 2020, 2025, and 2035. As Table 1 below shows, 2020, is the year of attainment as well as a "budget year" and 2025 and 2035 are analysis years. As described above, PM10 emissions for the 2025 and 2035 analysis years must be less than or equal to the 2020 "budget" to demonstrate compliance with the SJVAPCD 2007 PM10 Plan.

Section 93.118(b)(2) clarifies that when a maintenance plan has been submitted, conformity must be demonstrated for the last year of the maintenance plan and any other years for which the maintenance plan establishes budgets in the time frame of the transportation plan. Section 93.118(d)(2) indicates that a regional emissions analysis may be performed for any years, the attainment year, and the last year of the plan's forecast. Other years may be determined by interpolating between the years for which the regional emissions analysis is performed.

TABLE 1. EMISSIONS BUDGET YEARS BY POLLUTANT

Pollutant	Budget Years[1]	Attainment/ Maintenance Year	Intermediate Years	RTP Horizon Year
PM-10	2020	2020	2025	2035

Source: San Joaquin Valley Air Pollution Control District, 2007

[1] Budget years that are not in the time frame of the transportation plan are not included as analysis years (e.g.,PM-10 2005,), although they may be used to demonstrate conformity.

Section 93.118(d)(2) indicates that the regional emissions analysis may be performed for any years in the time frame of the transportation plan provided they are not more than ten years apart and provided the analysis is performed for the attainment year (if it is in the time frame of the transportation plan) and the last year of the plan's forecast period. Emissions in years for which consistency with motor vehicle emissions budgets must be demonstrated, as required in paragraph (b) of this section (i.e., each budget year), may be determined by interpolating between the years for which the regional emissions analysis is performed.

Particulate Matter

The SJVAPCD 2007 PM10 Maintenance Plan which relies on the 2003 PM10 Plan for emissions reductions measures allows trading from the motor vehicle emissions "budget" for the PM-10 precursor NOx to the motor vehicle emissions budget for primary PM10 using a 1.5 to 1 ratio. The trading mechanism allows the agencies responsible for demonstrating transportation conformity in the San Joaquin Valley to supplement the 2020 budget for PM-10 with a portion of the 2020 budget for NOx, and use these adjusted motor vehicle emissions budgets for PM-10 and NOx to demonstrate transportation conformity with the PM-10 Maintenance Plan for analysis years after 2005. The approved PM10 trading mechanism recognizes NOx precursor emissions result in the formation of PM10 emissions at a rate of 1 ton of PM10 for every 1.5 tons of NOx.

The trading mechanism is approved for analysis years after 2005. To ensure that the trading mechanism does not impact the ability to meet the NOx "budget" contained in the PM10 Maintenance Plan, the NOx emission reductions available to supplement the PM-10 motor vehicle emissions "budget" shall only be those remaining after the NOx motor vehicle emissions "budget" has been met.

For example in 2020, PM10 raw emissions resulting from the 2011 RTP equal 6.9 tons per day and NOx emissions equal 10.5 tons per day. Because 2020 NOx emissions are less than the 2020 NOx emissions "budget" (10.8 tons per day) from the SJVAPCD 2007 PM10 Maintenance Plan, emissions trading as approved in the PM10 plan is allowable. Trading between the PM10 emissions budget and the NOx emissions budget occurs utilizing the difference between the applicable NOx budget, which in this case is the 2020 "budget", and the actual NOx emissions resulting from the 2011 RTP. In 2020, the difference between the 2020 NOx budget and the 2020 NOx emissions is 0.3 tons per day. Emission trading as approved in the PM10 Plan utilizes a 1.5 ton of NOx for every 1 ton of PM10 emissions remaining between the applicable NOx budget and the actual NOx emissions. Because the analysis demonstrates that PM10 precursor NOx emissions are less than the emissions budgets, it is likely, PM10 emissions resulting from the presence of the NOx precursor will not form in 2020. As displayed in Table 2, the PM10 emissions resulting from the 2011 RTP are greater in 2020 than the 2020 "budget" by .2 tons per day, but the 2020 NOx emissions resulting from the 2011 RTP are less than the 2020 emissions budget by .3 tons per day. Because the PM 10 emissions resulting from the 2011 RTP in 2020 are greater than the 2020 budget, trading between the 2020 PM10 and NOx budgets must be utilized. For every 1.5 tons of NOx reduced 1 ton of PM10 does not develop in the atmosphere. To determine the necessary NOx emissions needed to trade the difference between the 2020 PM10 budget and the 2020 PM10 emissions resulting from the2011 RTP. In this case that difference is 0.2 tons per day. This means the difference between the 2020 NOx budget and the 2020 NOx emissions resulting from the 2020 RTP will need to be greater than or equal to 0.3 tons per day. As documented in the table below the difference between the 2020 NOx "budget" and the 2020 NOx emissions resulting from the 2011 RTP is 0.3 tons per day.

TABLE 2. PM10 EMISSIONS TRADING		
	PM10	**NOx**
2020 PM10 Emissions "Budgets"	**6.7**	**10.8**
2020	6.9	10.5
Difference	-0.2	0.3
1.5 (Adjustment to NOx Budget): Equals 1.5 times 0.2	0.3	

Documentation of this can be found in the 2011 Conformity Analysis for the 2011 RTP and the 2011 FTIP which was released for public comment concurrent to the 2011 RTP and 2011 RTP EIR.

The term "budget" after scenario year represents a not to exceed value. The term base year after a scenario year in the tables below also reflects a not to exceed value against which future emissions from the 2011 RTP are measured.

For this analysis, only on-road mobile sources are considered as the 2011 RTP does not impact the implementation of any SJVAPCD regulations or incentives on other emissions source categories.

Results of the Analysis for State Air Quality Standards

As shown in Tables 3 through 8, the total emissions in each scenario year for each pollutant is less than the emissions "budget" as established in the applicable SJVAPCD Plan. As previously noted, the emissions "budget" for each criteria pollutant is a "threshold" or "not to exceed" value for emissions. These tables demonstrate that the 2011 RTP contributes to positive progress toward the attainment of state ambient air quality standards. These tables also demonstrate that the 2011 RTP is consistent with the SJVAPCD plans, including their regulations and incentives relative to motor vehicle emissions budgets.

TABLE 3. OZONE

	Emissions (Tons/Day)		**%Below Budget**		**% Reduction/Year**	
	ROG	**NOX**	**ROG**	**NOX**	**ROG**	**NOX**
2011 Budget	**9.0**	**22.3**	**N/A**	**N/A**	**N/A**	**N/A**
2011	8.8	21.9	2.67%	1.75%	-	-
2014 Budget	**7.5**	**17.2**	**N/A**	**N/A**	**N/A**	**N/A**
2014	7.2	16.6	3.87%	3.37%	5.90%	8.05%
2017 Budget	**6.5**	**13.4**	**N/A**	**N/A**	**N/A**	**N/A**
2017	6.3	13.0	3.23%	2.76%	4.25%	7.20%
2023	5.0	8.5	23.85%	36.94%	3.55%	5.86%
2025	4.6	7.6	28.62%	43.06%	3.13%	4.85%
2035	3.7	6.3	43.69%	53.28%	2.11%	1.80%

TABLE 4. PM-10

	Emissions (Tons/Day)		**%Below Budget**		**% Reduction/Year**	
	PM-10	**NOX**	**PM-10**	**NOX**	**PM-10**	**NOX**
2020 Budget	**6.9**	**10.5**	**N/A**	**N/A**	**N/A**	**N/A**
2020	6.9	10.5	0.0%	0.0%	-	-
Adjusted 2020 Budget	**7.2**	**10.1**	**N/A**	**N/A**	**N/A**	**N/A**
2025	7.2	7.8	0.0%	22.8%	-0.9%	5.1%

Adjusted 2020 Budget	**7.9**	**9.0**	**N/A**	**N/A**	**N/A**	**N/A**
2035	7.9	6.4	0.0%	28.9%	-1.0%	1.8%

TABLE 5.
PM-2.5 ASSUMES ADEQUATE CONFORMITY BUDGETS: 1997 PM2.5 24-HOUR & ANNUAL STANDARDS AND 2006 24-HOUR STANDARD

	Emissions (Tons/Day)		%Below Budget		% Reduction/Year	
	PM-2.5	**NOX**	**PM-2.5**	**NOX**	**PM-2.5**	**NOX**
2012 Budget	**0.9**	**20.8**	**N/A**	**N/A**	**N/A**	**N/A**
2012	0.8	20.0	11.11%	3.85%	-	-
2014	0.7	16.8	22.22%	19.23%	6.25%	8.00%
2017	0.6	13.1	33.33%	37.02%	4.76%	7.34%
2025	0.6	7.6	33.33%	63.46%	0.00%	5.25%
2035	0.6	6.2	33.33%	70.19%	0.00%	1.84%

TABLE 6.
PM-2.5 ASSUMES NO EPA ACTION ON CONFORMITY BUDGETS: 1997 PM2.5 24-HOUR STANDARDS

	Emissions (Tons/Day)		%Below Budget		% Reduction/Year	
	PM-2.5	**NOX**	**PM-2.5**	**NOX**	**PM-2.5**	**NOX**
2002 Base Year	**1.0**	**30.2**	**N/A**	**N/A**	**N/A**	**N/A**
2014	0.7	17.1	30.00%	43.38%	2.50%	3.61%
2017	0.6	13.5	40.00%	55.30%	4.76%	7.02%
2025	0.6	7.8	40.00%	74.17%	0.00%	5.28%
2035	0.6	6.4	40.00%	78.81%	0.00%	1.79%

TABLE 7.
PM-2.5 ASSUMES NO EPA ACTION ON CONFORMITY BUDGETS: 1997 PM2.5 ANNUAL STANDARDS

	Emissions (Tons/Day)		%Below Base Year		% Reduction/Year	
	PM-2.5	**NOX**	**PM-2.5**	**NOX**	**PM-2.5**	**NOX**
2002 Base Year	**365**	**11023**	**N/A**	**N/A**	**N/A**	**N/A**
2014	256	6242	30.00%	43.38%	2.50%	3.61%
2017	219	4928	40.00%	55.30%	4.76%	7.02%
2025	219	2847	40.00%	74.17%	0.00%	5.28%
2035	219	2336	40.00%	78.81%	0.00%	1.79%

TABLE 8.
PM-2.5 ASSUMES NO EPA ACTION ON CONFORMITY BUDGETS: 2006 PM2.5 24-HOUR STANDARDS

	Emissions (Tons/Day)		%Below Base Year		% Reduction/Year	
	PM-2.5	**NOX**	**PM-2.5**	**NOX**	**PM-2.5**	**NOX**
2008 Base Year	**1.0**	**28.4**	**N/A**	**N/A**	**N/A**	**N/A**
2014	0.7	17.1	30.00%	39.79%	5.00%	6.63%
2017	0.6	13.5	40.00%	52.46%	4.76%	7.02%
2025	0.6	7.8	40.00%	72.54%	0.00%	5.28%
2035	0.6	6.4	40.00%	77.46%	0.00%	1.79%

While Table 9 documents that PM10 emissions grow in 2025 and 2035, it should be noted that PM10 NOx emissions continue to decrease. As documented in the SJVAPCD 2007PM10 Plan, PM10 precursor emissions, such as NOx, are emissions sources that have the highest potential to form PM10. By reducing the PM10 precursor emissions, the 2011 RTP will reduce the potential for the formation of PM10. Additionally, it should be noted that PM10 emissions in 2025 and 2035 still remain below the motor vehicle emissions thresholds (i.e. "budget year" and "base year"), therefore the emissions comply with the SJVAPCD plan to reduce PM10 emissions. Collectively, this demonstrates compliance with the state ambient air quality standards for PM10.

TABLE 9.
PM-10 EMISSIONS (ANNUAL TONS PER DAY)

	Emissions (Tons/Day)		%Below Budget		% Reduction/Year	
	PM-10	**NOX**	**PM-10**	**NOX**	**PM-10**	**NOX**
2020 Budget	**6.9**	**10.5**	**N/A**	**N/A**	**N/A**	**N/A**
2020	6.9	10.5	0.0%	0.0%	-	-
Adjusted 2020 Budget	**7.2**	**10.1**	**N/A**	**N/A**	**N/A**	**N/A**
2025	7.2	7.8	0.0%	22.8%	-0.9%	5.1%
Adjusted 2020 Budget	**7.9**	**9.0**	**N/A**	**N/A**	**N/A**	**N/A**
2035	7.9	6.4	0.0%	28.9%	-1.0%	1.8%

Conclusion

The SJVAPCD 2007 PM10 Maintenance Plan documents the SJVAPCD's plan to achieve the state ambient air quality standards, and as such, compliance with the regulations and incentives contained in the SJVAPCD plan results in compliance with the state ambient air quality standards. Based on the air quality analysis, the 2011 RTP conforms to the applicable SJVAPCD plans (PM10 Maintenance Plan) and demonstrates progress toward attainment with the state ambient air quality standards for PM10. Implementation of the 2011 RTP would result in a less than significant impact to PM10.

TABLE A-1
MITIGATION MONITORING PROGRAM
STANCOG 2011 REGIONAL TRANSPORTATION PLAN

Mitigation Measure	Implementing Responsibility	Monitoring Responsibility	Monitoring Timing	Monitoring Sign-Off
Energy and Climate Change				
Measure 4.1.5. StanCOG shall develop actions and policies to reduce regional GHG emissions from the transportation sector. Specific actions and policies include the following:	StanCOG	StanCOG	Annual Report	
1. Develop a Sustainable Communities Strategy (SCS) in compliance with SB 375 prior to the adoption of the next RTP. Within one year from the adoption of the RTP, StanCOG will undertake the following: StanCOG will work with the local jurisdictions and transit operators with Stanislaus County to develop countywide land use scenarios that reflect different population distributions and land use (mix and density), and multimodal transportation strategies, utilizing the StanCOG regional travel demand model in coordination with a rapid fire tool similar to I-Places. Scenarios will be developed to identify the alternatives that demonstrate potential reductions in vehicle miles traveled (VMT) and total vehicle miles; GHG, conventional and toxic air pollutant emissions; long distance commute trips, and other such factors discussed in the RTP and EIR as the StanCOG Board thinks advisable consistent with state and federal law. Coordination with local agencies currently in the development process of local climate action plans or general plan updates are important for consistency purposes. The schedule identified to develop alternative scenarios should be flexible to allow incorporation of these planning efforts into the regional scenario development effort. Public participation in this process is important to StanCOG and will be incorporated into the scenario development process identified above.			Commence within one year of RTP adoption.	
2. Upon completion of the scenario development exercise above, StanCOG will use the data from this exercise as well as public input to develop a multimodal transportation strategy that when combined with land use demonstrates the most potential to meet the following goals: reductions in vehicle miles traveled (VMT) and total vehicle miles; GHG, conventional and toxic air pollutant emissions; long distance co9mmute trips and other such factors discussed in the RT and EIR as the COG Board thinks advisable consistent with state and federal law. This strategy may be one of the scenarios developed in 1 above or may be a hybrid scenario.				
3. The resulting multimodal transportation strategy from 2 above will be presented to the StanCOG Board as an update to the 2011 RTP, for approval or disapproval by the Board subject to all applicable federal and state laws.				
Land Use				