

**2016 Addendum to the
Programmatic Environmental Impact Report
for the
Regional Transportation Plan
Del Norte Local Transportation Commission**



November, 2016

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ADDENDUM TO THE 2002 SUPPLEMENTAL PROGRAM ENVIRONMENTAL IMPACT REPORT

DRAFT

for the

DEL NORTE COUNTY 2016 REGIONAL TRANSPORTATION PLAN

Report Prepared for:

DEL NORTE COUNTY LOCAL TRANSPORTATION COMMISSION

1301 B Northcrest Drive #16
Crescent City, CA 95531

Prepared by:

gallaway
ENTERPRISES

117 Meyers Street, Suite 120
Chico, CA 95928
(530) 895-1109

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Addendum to the 2002 Supplemental Program Environmental Impact Report

for the

2016 Regional Transportation Plan

Del Norte  **Local Transportation Commission**

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Draft

ADDENDUM TO THE 2002 SUPPLEMENTAL REGIONAL TRANSPORTATION PLAN PROGRAM ENVIRONMENTAL IMPACT REPORT (PEIR) FOR THE 2016 REGIONAL TRANSPORTATION PLAN (RTP)

INTRODUCTION

The Del Norte Local Transportation Commission (DNLTC) proposed to amend the 2002 Supplemental PEIR (SCH # 1991023088) to reflect minor updates and revisions to projects contained in the project lists incorporated into the Action Element of the 2016 RTP.

A Program Environmental Impact Report (PEIR) for the Del Norte County Regional Transportation Plan (RTP) was prepared and adopted in February 1990 for the 1990 RTP. The 1992, 1994, 1996 and 2000 updates of the RTP identified no significant changes from the 1990 RTP and the activities described in the 1992, 1994, 1996 and 2000 RTPs were within the scope of the 1990 PEIR. For the 2002 RTP a Supplemental PEIR was prepared in which it was determined that the 2002 RTP would not have a significant effect on the environment, mitigation measures were not made a condition of the approval and a statement of overriding considerations was not adopted for the project. For the 2007 and 2011 RTPs, addendums to the 2002 Supplemental PEIR were prepared.

BASIS FOR THE ADDENDUM

An Addendum to the 2002 RTP Supplemental PEIR is appropriate to address proposed changes to the 2011 RTP contained in the 2016 RTP. The 2016 RTP contains a list of all currently proposed projects. The changes proposed to the 2016 RTP project list generally consist of the following:

- Removal of projects that have been completed since the 2011 RTP.
- Movement of projects from the long term to the short term implementation period.
- Movement of projects from the short term to the long term implementation period due to unanticipated funding shortfalls.
- Addition of projects focused on the maintenance and repair of existing facilities and infrastructure as well as pedestrian, bicycle, and complete streets projects.

Further detail on the proposed 2016 RTP is provided below under the subheading "Project Description." When an EIR has been certified and the project is modified or otherwise changed after certification, additional CEQA review may be necessary. The key considerations in determining the need for the appropriate type of additional CEQA review are outlined in Section 21166 of the Public Resources Code (CEQA) and *CEQA Guidelines* Sections 15162, 15163 and 15164.

Section 21166 of CEQA specifically provides that no Subsequent or Supplemental PEIR shall be required unless the following occurs:

1. Substantial changes are proposed in the project which will require major revisions of the EIR.
2. Substantial changes occur with respect to the circumstances under which the project is being undertaken which will require major revisions in the EIR.
3. New information of substantial importance, which was not known and could not have been known at the time the EIR was certified as complete, becomes available.

The CEQA Guidelines further refine the circumstances under which a supplemental or subsequent EIR may be required. Guidelines Section 15162 provides as follows:

- “(a) When an EIR has been certified or negative declaration adopted for the project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:
1. Substantial changes are proposed in the project which will require major revisions in the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
 2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
 3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence, at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:
 - A. The project will have one or more significant effects not discussed in the previous EIR;
 - B. Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - C. Mitigation measures or alternative previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
 - D. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.”

The proposed changes to the RTP project list are not substantial and would not result in one or more significance effects not discussed in the 2002 Supplemental PEIR, nor result in impacts that are substantially more severe than shown in the 2002 Supplemental PEIR. Moreover, no changes to the mitigation measures contained in the 2002 Supplemental PEIR are being proposed that could trigger additional review regarding such measures.

If some changes or additions are necessary, but none of the conditions have occurred requiring preparation of a Subsequent EIR (Section 15164(a)), the lead agency may prepare an Addendum. An Addendum must include a brief explanation of the agency’s decision not to prepare a Subsequent EIR and be supported by substantial evidence in the record as a whole (Section 15164(e)). The Addendum to the EIR need not be circulated for public review but it may be included in or attached to the Final EIR (Section 15164(c)). The decision-making body must consider the Addendum to the EIR prior to making a decision on the project (15164(d)).

DNLTC has assessed the proposed projects at the programmatic level, and finds that the projects identified in the 2016 RTP are consistent with the analysis, mitigation measures, and Findings of Fact contained in the 2002 Supplemental PEIR. Further, the DNLTC finds that the proposed changes to the 2016 RTP project list would not result in a substantial change to the region-wide impacts programatically addressed in the 2002 Supplemental PEIR.

As discussed in the 2002 Supplemental PEIR, the level of detail for individual projects on the RTP project list is generally insufficient to reliably analyze local effects. Such analysis is more appropriately undertaken in Tier 2, project-specific environmental documents undertaken by the individual agencies proposing each project. Proposed changes to the RTP project list do not result in any of the conditions described in CEQA section 15162(a).

For the reasons set forth in this Addendum, the DNLTC has determined that an Addendum to the 2002 Supplemental PEIR is the appropriate CEQA document because the proposed revisions to the 2016 RTP project list **do not meet** the requirements of Section 15162(a) for preparation of a Subsequent EIR.

PROJECT DESCRIPTION

As noted above, the 2016 RTP includes minor changes to the projects list contained in the 2011 RTP. There are generally two types of project included in the 2016 RTP:

1. Minor Revisions to Projects – These projects appear in the 2011 RTP as amended. Project changes being included in the 2016 RTP include the following:
 - Minor revisions to schedules (revised completion years),
 - Minor revisions and/or changes in project costs,
 - Minor revision to projects that have been split into multiple projects,
 - Deletion of completed projects.

2. Minor New Projects – These projects were not included in the 2011 RTP project list and are being added. Generally the new projects are categorized as rehabilitation of road surfaces, bridge replacement or reconstruction, pedestrian, bicycle facilities and complete streets improvement projects, construction of a transit center building and aviation safety improvements. The regional level analysis conducted in the 2002 Supplemental PEIR addressed these categories of projects.

The 2016 RTP project list can be found in Chapter 4 of the 2016 RTP.

INTRODUCTION AND PUPOSE

This Addendum to the Program Environmental Impact Report (PEIR) has been prepared for the Del Norte Local Transportation Commission's (DNLTC) 2016 Del Norte Regional Transportation Plan. This document is an addendum to the Supplemental PEIR prepared in 2002 and the PEIR certified in 1992.

A Regional Transportation Plan (RTP) is a planning document that presents general policies, guidelines, and lists of capital improvement projects for various transportation modes for a 20 year horizon. Transportation modes include roadways, public transit, aviation, bicycle and pedestrian facilities, tele-transportation, goods movement, transportation system management and transportation demand management. The RTP for the Del Norte region was last updated in 2011. As the Regional Transportation Planning Agency (RTPA) for the region, the DNLTC is required by California law to adopt and submit an updated RTP to the California Transportation Commission (CTC) and to the California Department of Transportation (Caltrans) every five years. The region is defined as Del Norte County, California. The RTP is subject to the requirements of California Environmental Quality Act (CEQA).

A PEIR is a "first tier" environmental document which is prepared for an agency program or series of actions that can be characterized as one large project. Once a PEIR has been prepared, subsequent

activities within the program must be evaluated to determine whether an additional CEQA document needs to be prepared. Section 15162 of the Guidelines to the (CEQA) requires that a certified EIR be updated when substantial changes are proposed in a project. Section 15164 of the Guidelines permits a lead agency to prepare an addendum to a previously certified EIR if only minor technical changes or additions to the project are necessary. A PEIR was prepared and adopted as part of the development of the 1992 RTP. A Supplemental PEIR was prepared for the 2002 RTP update. The 2011 RTP identified no significant changes from the 2002 environmental analysis. The DNLTC has determined that the Del Norte 2016 RTP will not result in significant impacts beyond those identified in the original PEIR. Therefore, an Addendum to the PEIR was prepared as part of the 2016 RTP update.

The 2016 Del Norte RTP was prepared to comply with the CTC's most recent (2010) RTP guidelines. Actions proposed in the 2016 RTP update do not vary significantly from those identified in the four updates since the certification of the PEIR. These actions would not cause potentially significant impacts to occur, nor would they require new mitigation measures; therefore:

- Activities described in the 2016 RTP are within the scope of the 1992 Program EIR and 2002 Supplemental PEIR; and
- The 1992 Program EIR, and 2002 Supplemental PEIR address the range of impact topics covered in the 2016 RTP for the purposes of CEQA.

CHANGES TO 2011 RTP

The 2016 RTP has been updated to comply with the CTC's requirement to update every five years. Many of the changes in the 2016 RTP represent format and organization changes from the 2011 document. Changes are summarized below by RTP Element:

- Introduction – This chapter informs the reader about the RTP plan development requirements and process as well as summarizes the public and stakeholder input process.
- Existing Conditions – This chapter reviews each mode of transportation and was updated to reflect the most recent data available such as demographic data from the US Census or traffic counts from Caltrans. Existing conditions have not changed significantly in the last five years and therefore do not have the potential to change the significance of impact on the environment. This section also includes an assessment of regional transportation needs based on the existing conditions analysis and public input. Regional transportation needs have remained relatively consistent over the last few years. The RTP now includes an assessment of Vehicle Miles Traveled (VMT) as a measure of assessing transportation impacts per the guidelines of SB 743.
- Policy Element – Minor changes were made to the goals, policies and objectives listed in the RTP.
- Action Element – The Action Element prioritizes regional transportation capital improvement projects as short- or long-range improvements, consistent with the identified needs and policies. Projects are categorized by transportation facility type: roadways, bridges, transit, aviation and bicycle/pedestrian. Projects completed since 2011 were eliminated from the lists and project cost estimates and anticipated completion dates were updated. With respect to new transportation improvement projects, fifty regional transportation improvement projects were added to the lists in the 2016 RTP. The lists of new projects are found in Chapter 4 of the 2016

RTP. Generally the new projects are categorized as rehabilitation of road surfaces, bridge replacement or reconstruction, pedestrian, bicycle facilities and complete streets improvement projects, construction of a transit center building and aviation safety improvements.

- Financial Element – Similar to the 2011 RTP, the Financial Element reviews funding sources available for transportation improvement projects and projects the level of funding available for the 20 year planning period.
- Top Priority Projects – Similar to the 2011 RTP the Top Priority Projects chapter identifies a list of projects that are considered most important. The projects listed in this section were selected from projects already mentioned in the Action Element.

SUMMARY OF ENVIRONMENTAL IMPACTS

In this section, impacts of the 2016 RTP on the environment are analyzed for a variety of issues. The degree of impact for each discussion topic is noted based upon the following definitions which were obtained from the CEQA Initial Study Checklist:

- **Potentially Significant Impact:** An impact which could be significant and for which no mitigation has been incorporated. Such an impact would require the preparation of an Environmental Impact Report.
- **Less Than Significant with Mitigation Incorporation:** An impact which requires mitigation to reduce the impact to a less than significant level.
- **Less Than Significant Impact:** An impact which is considered less than significant under the standards of CEQA.
- **No Impact:** An issue for which the Project would have no impact.

As this is an EIR Addendum, analysis is limited to changes in the current (2016) RTP. The analysis is consistent with the analysis conducted in the Program EIRs prepared for the Del Norte County and Crescent City General Plans.

The County of Del Norte and the City of Crescent City are local DNLTC member entities that would carry out many of the planned transportation system improvements identified in the RTP. As mentioned above, both agencies have environmental review processes, consistent with the CEQA for project level analysis. Certain County and City General Plan policies that protect environmental resources are referenced when discussing mitigation of potential impacts identified in this section. It should be noted that these references are informational only and that DNLTC member entities are responsible for implementing their respective general plans. Caltrans, Tribes and other implementing agencies also conduct environmental review consistent with CEQA for project level analysis.

Climate/Air Resources

For the purposes of this Addendum, an impact is considered significant if the implementation of the RTP would result in any of the following effects:

- A violation of an ambient air quality standard or a substantial contribution to an existing air quality violation.
- Creation of objectionable odors affecting a substantial number of people. Transportation-related air quality impacts potentially include vehicle emissions and construction related impacts from transportation system improvements.

The new projects listed in the RTP will not increase the capacity of state highways or local roadways in Del Norte County. In fact, many of the proposed projects include the construction of facilities to promote safety for bicyclists and pedestrians, which will encourage alternative modes of transportation in the region.

Air quality impacts from construction activities include construction equipment and vehicle emissions, and dust from excavation, grading, demolition, and debris transport. Long term impacts on regional air quality are expected to increase at a slower rate than in the past, due to conversion to more efficient and lower emission vehicles and plan policies and actions encouraging public transit use and bicycle and pedestrian system improvements.

The 2016 RTP includes the following policies to address air quality impacts:

- Comply with state and federal climate change regulations and standards.
- Consider GHG emissions as part of every transportation capital improvement project decision.
- Pursue projects with positive GHG impacts that are realistic given the rural nature of Del Norte County, including transit programs, ridesharing programs, bicycle and pedestrian improvements, ITS strategies and maintenance of existing roadways to reduce vehicle emissions.
- Conduct environmental review consistent with the CEQA for individual projects as they advance to the implementation stage of development.

Additionally, the General Plans of Crescent City and Del Norte County contain measures to minimize, avoid and reduce negative air quality impacts resulting from the implementation of projects in their respective jurisdictions. Caltrans, Tribes and other implementing agencies also have environmental programs to control some of these potential impacts. Each RTP project will undergo individual environmental review prior to implementation.

Hydrology

Transportation-related hydrology impacts potentially include increased runoff from transportation facility surfaces, structures that impede water flows, and water quality impacts from vehicle and roadway pollutants. Land-based transportation corridor projects have the potential to affect surface and ground water resources in the area. These impacts include an increase in impervious surface which reduce permeability and increase storm water runoff; changes in water quality from sediment or contaminants; and potential alterations to watercourses that increase velocity or alter the floodplain.

The existing and new projects in the RTP projects list include roadway rehabilitation and reconstruction which would bring more facilities up to current design standards for managing hydrology and water

quality.

In addition, Crescent City and Del Norte County follow policies contained within their respective General plans to control erosion, protect water quality, protect against flooding and tsunami impacts, and minimize other hydrological impacts. Caltrans, Tribes and other implementing agencies also have environmental programs to control some of these potential impacts. Each RTP project will undergo individual environmental review prior to implementation.

Topography

For the purposes of this Addendum, an impact is considered significant if the implementation of the RTP would result in substantial soil erosion or slope instability.

Steep slopes and unstable geologic conditions found in certain areas of the county are susceptible to movement and erosion, especially where affected by roadway construction related cut- or fill-slopes. Roadway projects have the potential slope stability impacts, especially if unstable slopes are exposed or if fill is added. Slope failures can result in sediment deposition into streams and wetlands. Ongoing repair of unstable slopes may result in a continuing need to excavate and store material.

Erosion can occur both during and after construction if short- and long-term erosion control techniques are not implemented. During construction, weather conditions, material type, slope steepness, and erosion control technique can influence erosion hazards. The effectiveness of long-term erosion control techniques can have the most effect on post construction erosion hazards.

RTP projects would have the potential for erosion; however the General Plans of Crescent City and Del Norte County contain measures to minimize, avoid and reduce topographical and erosional impacts resulting from the implementation of projects in their respective jurisdictions. Caltrans, Tribes and other implementing agencies also have environmental programs to control some of these potential impacts. Each RTP project will undergo individual environmental review prior to implementation.

Geology

The RTP would have a significant impact to geologic resources if planned regional transportation projects, such as roadways, resulted in significant degradation of geologic resources, or were placed in areas of known instability. Faults and liquefaction zones are found in a number of areas in Del Norte County and are factors to be considered in maintaining existing and planning future transportation projects. Facilities, such as roadways, bridges, transmission lines, and pipelines, located near faults or in a liquefaction zone, can be damaged as a result of a seismic event.

No new roadways will be constructed as part of this RTP update. Additionally, the General Plans of Crescent City and Del Norte County contain measures to minimize, avoid and reduce geological impacts resulting from the implementation of projects in their respective jurisdictions. Caltrans also has environmental programs to control some of these potential impacts. Each RTP project will undergo individual environmental review prior to implementation. Transportation system impacts on geological resources resulting from 2016 RTP implementation are considered less than significant.

Biological Resources

The RTP would have a significant impact to biological resources if planned regional transportation projects resulted in substantial interference with the movement of resident or migratory fish or wildlife species; substantial effect (loss) to a rare or endangered species or the species' habitat; or substantial

diminishment of plant, fish or wildlife habitat.

The proposed projects included in the 2016 RTP included the rehabilitation of road surfaces, bridge replacement or reconstruction, pedestrian, bicycle facilities and complete streets improvement projects, construction of a transit center building and aviation safety improvements. All of the proposed projects are on existing disturbed sites. Additionally, DNLTC and local governments will work closely with biological and environmental regulatory agencies (USFWS, USACE, CDFW, RWQCB, etc.) to ensure that any potential impacts to biological resources are avoided or minimized at levels that are less than significant.

Additionally, the General Plans of Crescent City and Del Norte County contain measures to minimize, avoid and reduce impacts to biological resources resulting from the implementation of projects in their respective jurisdictions. Caltrans, Tribes and other implementing agencies also have environmental programs to control these potential impacts. Each RTP project will undergo individual environmental review prior to implementation. Therefore, potential impacts from the 2016 RTP are considered less than significant.

Land Use and Population

The RTP would have a significant land use impact if its implementation would conflict with adopted land use plans in the region, or if it includes planned improvements that would displace established communities.

The RTP plans improvements for the mobility of goods and people, consistent with planned growth in the region. These improvements are based on projected land uses in adopted land use plans, including Del Norte County and Crescent City General Plans. Residential, commercial and other developed land uses would not be displaced by transportation facilities programmed in the RTP. Tribes and other implementing agencies also have regulations to control these potential impacts. No increase in housing demand, beyond that already projected for the region in the aforementioned plans is anticipated. The potential land use impacts are therefore considered less than significant.

Health and Safety

For the purposes of this Addendum, an impact is considered significant if the implementation of the RTP would result in any of the following effects:

- Exposure of people or transportation related spills or accidental release of hazardous materials;
or
- Exposure of the public or of wildlife to toxic substances used in transportation related circumstances.

The new 2016 RTP projects are designed to improve safety in the region by improving pedestrian and bicycle facilities, resurfacing roadways and rehabilitating or replacing bridges. The projects would not increase hazardous materials trucking levels.

Current policies used by Caltrans, Crescent City and the County and well as application rules, minimize the use of herbicides on roadways. No shipping companies that transport petroleum use Crescent City Harbor, nor are there any offshore oil production facilities. The California Highway Patrol, Caltrans, and

the County Sheriff's Department follow the procedures of the County's Emergency Response Plan, in case a hazardous material is spilled on the local roadway system. Any roadway improvements that reduces the risk of traffic accidents also reduces the risk of hazardous spills. Therefore the RTP can be considered beneficial to public health and safety.

Support for these improvements to public health and safety is demonstrated by the following RTP policies:

- Prioritize roadway projects according to safety standards, including required maintenance and repair, in the most cost-effective manner given available resources.
- Identify and eliminate unsafe conditions on state highways and intersections, in coordination with Caltrans.
- Support land use decisions that discourage or prevent development in the vicinity of the airport that may present significant public safety issues.
- Implement Airport Capital Improvement Projects as funding allows, with priority for projects required to improve the safety of the airport.
- Design roadways using current design practices.
- Prioritize improvement projects which will increase bicycle safety along corridors and intersections frequently used by school children, recreational cyclists, commuter cyclists/pedestrians and visitors.

Additionally, the General Plans of Crescent City and Del Norte County contain measures to minimize, avoid and reduce potentially dangerous impacts and improve safety resulting from the implementation of projects in their respective jurisdictions. Caltrans, Tribes and other implementing agencies also have environmental programs to control some of these potential impacts. Each RTP project will undergo individual environmental review prior to implementation. The potential for impacts to safety are therefore considered less than significant.

Noise

For the purposes of this EIR, a significant impact is assumed if adoption or implementation of development as presented in the RTP would result in any of the following effects:

- Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;
- Exposure of persons to or generation of excessive ground borne vibration or ground borne noise levels; or
- Substantial permanent, temporary, or periodic increases in ambient noise levels in the project vicinity above existing levels without the project.

The General Plans of Crescent City and Del Norte County contain measures to minimize, avoid and reduce noise related impacts resulting from the implementation of projects in their respective

jurisdictions. Caltrans, Tribes and other implementing agencies also have environmental programs to control some of these potential impacts. Each RTP project will undergo individual environmental review prior to implementation. The potential for impacts on the topic of noise are therefore considered less than significant.

Public Services and Energy

The potential impact to public services would be significant if planned improvements exceeded existing or planned capacities for the region, or if projected energy consumption exceeded existing or planned supplies, or delivery system capability.

These public services include:

- Waterlines, wells, and groundwater supplies
- Wastewater systems
- Storm drainage systems
- Solid waste disposal services
- Law enforcement
- Fire protection
- Parks
- Gas and electric lines and facilities
- Schools
- Hospitals

The new RTP projects will not increase the capacity of the transportation system and therefore have no impact on public services and energy.

Cultural Resources

Road and highway construction, reconstruction and maintenance activities where earthmoving or dredging occur have the potential to disturb or destroy recorded and unrecorded cultural resources. Paleontological and archaeological resources are vulnerable to excavation activities by which valuable stratigraphic information can easily be lost. Historic resources still in use (bridges, road corridors, structures) could potentially be altered or lost due to seismic retrofitting and transportation corridor widening.

The proposed projects included in the 2016 RTP include the rehabilitation of road surfaces, bridge replacement or reconstruction, pedestrian, bicycle facilities and complete streets improvement projects, construction of a transit center building and aviation safety improvements. All of the proposed projects are on existing disturbed sites and are not expected to encounter new areas with known cultural resources during construction. Additionally, DNLTC and local governments will work closely with Native American Tribes to ensure that tribal cultural resources are not disturbed.

The General Plans of Crescent City and Del Norte County contain measures to minimize, and avoid cultural resource impacts resulting from the implementation of projects in their respective jurisdictions. Caltrans, Tribes and other implementing agencies also have environmental programs to control some of these potential impacts. Each RTP project will undergo individual environmental review prior to implementation, therefore there is expected to be no impact on cultural resources.

Aesthetics

Aesthetic impacts would be significant if implementation of the RTP substantially degraded the existing visual character or quality of the aesthetic natural, cultural or biological resources present within the county or created a new source of substantial light or glare which would adversely affect the day or nighttime views. Some of the new RTP projects will improve aesthetics in the region through the implementation of visually appealing gateway monuments and signage which denote the beginning and end of different communities in the region.

Additionally, the General Plans of Crescent City and Del Norte County contain measures to minimize, avoid and reduce aesthetic impacts resulting from the implementation of projects in their respective jurisdictions. Caltrans, Tribes and other implementing agencies also have environmental programs to control some of these potential impacts. Each RTP project will undergo individual environmental review prior to implementation.

COMPARISON OF ALTERNATIVES

The proposed 2016 RTP project list would not significantly affect the comparison of alternatives in the 2002 Supplemental PEIR. The analysis in the Project Alternatives chapter of the 1990 PEIR and 2002 Supplemental PEIR would not be significantly affected by the inclusion of the projects identified in the 2016 RTP. Therefore, no further comparison is required at the programmatic level.

LONG TERM EFFECTS

The projects in the 2016 RTP would result in impacts within the scope of the long-term effects discussion presented in the long term 2002 Supplemental PEIR, which includes an assessment of programmatic level unavoidable impacts, irreversible impacts, growth inducing impacts and cumulative impacts. The 2016 RTP would result in impacts consistent with the findings on long-term effects analysis contained within the 2002 Supplemental PEIR.

CONCLUSION

After completing programmatic environmental assessment of the 2016 RTP project list, the DNLTC finds that the adoption of the 2016 RTP would not result in new significant environmental effects or a substantial increase in the severity of any previously identified significant effect. The proposed changes are not substantial in the regional context analyzed in the 2002 Supplemental PEIR.

Further, DNLTC finds that the 2016 RTP project list does not significantly affect the comparison of regional alternatives identified in the 2002 Supplemental PEIR. As such, DNLTC has assessed the 2016 RTP project list and finds that inclusion of the proposed projects and content would be consistent with the analysis contained within the 2002 Supplemental PEIR. Therefore a subsequent or supplemental EIR is not required and this Addendum to the 2002 Supplemental PEIR fulfills the requirements of CEQA.