

RESOLUTION



RESOLUTION NUMBER:	18-12
SUBJECT:	Certify the Final Supplemental Environmental Impact Report for the 2018 Regional Transportation Plan and Sustainable Communities Strategy for the Shasta Region with Attached Findings and Statement of Overriding Considerations and Mitigating Monitoring and Reporting Program

WHEREAS, the Shasta Regional Transportation Agency (SRTA) is the designated Metropolitan Planning Organization (MPO) for the Shasta Region and is comprised of five-member agencies: Shasta County, the cities of Anderson, Redding, and Shasta Lake, and the Redding Area Bus Authority; and

WHEREAS, SRTA is the agency responsible for maintaining a continuing, cooperative, and comprehensive transportation planning process which will result in a Regional Transportation Plan and Sustainable Communities Strategy pursuant to 23 U.S.C. §134(a) and (g), 49 U.S.C. §5303(f); 23 C.F.R. §450, and 49 C.F.R. §613; and

WHEREAS, SRTA is the Lead Agency in preparing the 2018 Regional Transportation Plan and Sustainable Communities Strategy for the Shasta Region and is required to comply with the California Environmental Quality Act (CEQA) [Cal. Pub. Res. Code § 21000 et seq.]; and

WHEREAS, pursuant to CEQA Guidelines Section 15002(f), an Environmental Impact Report (EIR) is the public document used by a governmental agency to analyze the significant environmental effects of a proposed project, to identify alternatives, and to disclose possible ways to reduce or avoid the potential environmental damage; and

WHEREAS, CEQA Guidelines Section 15168(a) specifies that a Program EIR be prepared on a series of actions that can be characterized as one large project and are related either: (1) geographically; (2) as logical parts in a chain of contemplated actions; (3) in connection with issuance of rules, regulations, plans, or other general criteria, to govern the conduct of a continuing program; or (4) as individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways; and

WHEREAS, SRTA has determined that a Supplemental EIR (SEIR) is appropriate to assess the environmental impact of the 2018 Regional Transportation Plan (RTP) and Sustainable Communities Strategy (SCS) for the Shasta Region given no major new projects and policies since the 2015 RTP and SCS; and

WHEREAS, the SEIR is a regional planning level analysis which analyzes environmental impacts of the 2018 RTP on a broad planning level, while presenting as much detailed information about the individual RTP projects that is available at this time; and

WHEREAS, project-specific impacts of the individual RTP project should be analyzed in detail by the implementing agencies as the individual projects are designed, engineered, and considered for approval at a later date; and

WHEREAS, pursuant to CEQA Guidelines Section 15086, SRTA consulted with and requested comments on the Draft SEIR from responsible agencies, trustee agencies with resources affected by the project; and other state, federal, and local agencies which exercise authority over resources which may be affected by the RTP; and

WHEREAS, SRTA circulated a Notice of Preparation (NOP) of an EIR for the proposed project on February 6, 2018, to trustee and responsible agencies, the State Clearinghouse, and the public; and

WHEREAS, a scoping meeting was held on February 28, 2018, at 3:30 PM at SRTA offices to solicit concerns and issues relative to the RTP; and

WHEREAS, concerns raised in response to the NOP were considered during preparation of the Draft SEIR; and

WHEREAS, SRTA published a public notice of availability (NOA) for the Draft Program EIR on June 8, 2018, inviting comments from the general public, agencies, organizations, and other interested parties; and

WHEREAS, the Draft Program EIR was available for public review from June 8 through August 3, 2018; and

WHEREAS, pursuant to CEQA Guidelines Section 15088(a), SRTA, as the Lead Agency, must evaluate comments on significant environmental issues received from persons who review the Draft SEIR and must prepare a written response thereto; and

WHEREAS, SRTA received one comment letter from public agencies, regarding the Draft SEIR; and

WHEREAS, in accordance with CEQA Guidelines Section 15088, the Final SEIR responds to the written comments received; and

WHEREAS, the Final SEIR document and the Draft SEIR, as amended by the Final SEIR, constitute the Final SEIR; and

WHEREAS, when making the findings pursuant to CEQA Guidelines Section 15091(a)(1), the agency must also adopt a program for reporting on or monitoring the changes which have been either required in the project or made a condition of approval to avoid or substantially lessen significant effects, and which are fully enforceable through permit conditions, agreements, or other measures, as required by CEQA Guidelines Section 15091(d); and

WHEREAS, consistent with the requirements of the CEQA Guidelines, a Mitigation Monitoring and Reporting Program (MMRP) has been prepared to outline the procedures for implementing all mitigation measures identified in the EIR; and

WHEREAS, according to CEQA Guidelines Section 15093(b), where the decision of the public agency allows the occurrence of significant effects which are identified in the Final SEIR but are not avoided or substantially lessened, the agency must issue a Statement of Overriding Considerations setting forth the specific reasons to support its actions based on the Final Program EIR or other information in the record; and

WHEREAS, CEQA Guidelines Section 15093(c) provides that if an agency makes a statement of overriding considerations, the statement should be included in the record of the project approval and should be mentioned in the Notice of Determination.

NOW, THEREFORE, BE IT RESOLVED that:

1. Shasta Regional Transportation Agency (SRTA) finds as follows:
 - (a) The Final Supplemental Environmental Impact Report (SEIR) prepared for the 2018 Regional Transportation Plan (RTP) and Sustainable Communities Strategy (SCS) for the Shasta Region was completed in compliance with the California Environmental Quality Act; and
 - (b) The Final SEIR was presented to SRTA's decision-making body, the SRTA Board of Directors; and
 - (c) The SRTA Board of Directors has reviewed and considered information contained in the Final SEIR; and
 - (d) The Final SEIR reflects SRTA's independent judgment and analysis; and
 - (e) The Final SEIR consists of the Draft SEIR and the Final SEIR, which includes a Mitigation Monitoring and Reporting Program; and
2. Based on and incorporating all of the foregoing recitals and findings supported by substantial evidence in the record and set forth in the "Findings and Statement of Overriding Considerations," attached hereto and incorporated by reference, SRTA hereby certifies the Final SEIR for the 2018 RTP and adopts the Mitigation Monitoring and Reporting Program; and
3. SRTA hereby approves the 2018 Regional Transportation Plan and Sustainable Communities Strategy for the Shasta Region.

PASSED AND ADOPTED this 9th day of October 2018, by the Shasta Regional Transportation Agency.



Susie Baugh, Chair
Shasta Regional Transportation Agency

Resolution 18-12 Attachment:

**CEQA Findings of Fact, Statement of Overriding Considerations,
and Mitigation Monitoring and Reporting Program for the
Supplemental Environmental Impact Report (SEIR) for the 2015 Regional
Transportation Plan and Sustainable Communities Strategy for the Shasta Region;
State Clearinghouse No. 2014022018**

III. FINDINGS FOR IMPACTS IDENTIFIED AS INSIGNIFICANT

Public Resources Code § 21081 and CEQA Guidelines § 15091 do not require findings of fact for impacts that are less than significant. Under CEQA, no mitigation measures are required for impacts that are less than significant (CEQA Guidelines § 15126.4(a)(3)).

Section 4.0 of the Supplemental EIR and the Initial Study (Appendix A to the Supplemental EIR) explain why certain impacts (Less than Significant Environmental Factors) of the 2018 RTP/SCS were not found to be significant. These impacts are not discussed further in this Findings of Fact document, per CEQA Guidelines § 15091.

IV. FINDINGS FOR IMPACTS IDENTIFIED AS SIGNIFICANT BUT MITIGABLE

SRTA hereby finds that mitigation measures have been identified in the Supplemental EIR that will avoid or substantially lessen the following environmental impacts to a less than significant level. These findings are based on the discussion of impacts in the detailed issue area analyses in Section 4.0 of the Supplemental EIR and the Initial Study that is included as Appendix A to the Supplemental EIR, as well as relevant responses to comments in the Final Supplemental EIR. The significant impacts and the mitigation measures that will reduce them to a less than significant level are as follows.

A. Aesthetics

1. **Impacts.** Proposed transportation improvement projects under the 2018 RTP/SCS, as well as the land use patterns envisioned by the 2018 RTP/SCS, may affect public views along eligible scenic corridors, adjacent landscaping, and other scenic routes considered to have high scenic qualities. Development of proposed transportation improvement projects under the 2018 RTP/SCS, as well as the land use patterns envisioned by the 2018 RTP/SCS, would contribute to the alteration of Shasta County's character from primarily rural (or semi-rural) to a somewhat smaller urban condition. This would be a significant but mitigable impact.
 - a. **Mitigation** - SRTA recommends that individual project lead agencies implement the following mitigation measures for applicable transportation projects, including but not limited to those projects identified under the 2018 RTP/SCS. These measures can and should be implemented for all projects developed pursuant to the 2018 RTP/SCS that would adversely affect scenic corridors or visual character and quality.

AES-1(a) Where a particular 2018 RTP/SCS transportation improvement project affects adjacent landforms, the project sponsor shall ensure that recontouring provides a smooth and gradual transition between modified landforms and existing grade.

AES-1(b) The project sponsor shall ensure that landscaping is installed to restore natural features along corridors after widening, interchange modifications, realignment, or construction of ancillary facilities. Associated landscape materials and design shall enhance landform variation, provide erosion control, and blend with the natural setting. To ensure compliance with approved landscape plans, the implementing agency shall provide a performance security equal to the value of the landscaping/irrigation installation.

AES-1(c) The project sponsor shall ensure that a project in a scenic view corridor will have the minimum possible impact upon foliage, existing landscape architecture and natural scenic views, consistent with project goals.

AES-1(d) Potential noise impacts arising from increased traffic volumes associated with adjacent land development shall be preferentially mitigated through the use of setbacks and the acoustical design of adjacent proposed structures. The use of sound walls, or any other architectural features that could block views from the scenic highways or other view corridors, shall be discouraged to the extent possible. Where use of sound walls is found to be necessary, walls shall incorporate offsets, accents, and landscaping to prevent monotony. In addition, sound walls should be complementary in color and texture to surrounding natural features.

AES-2(a) Roadway extensions and widenings shall avoid the removal of existing mature trees to the extent possible. The loss of trees that are protected by local agencies shall be replaced at a minimum 2:1 basis and incorporated into the landscaping design for the roadway. The project sponsor of a particular 2018 RTP/SCS project shall ensure the continued vitality of replaced trees through periodic maintenance (see Mitigation Measure B-1(j) prescribed in Biological Resources.)

AES-2(b) Roadway lighting shall be minimized to the extent possible and shall not exceed the minimum height requirements of the local jurisdiction in which the project is proposed. This may be accomplished through the use of hoods, low-intensity lighting, and using as few lights as necessary to achieve the goals of the project.

AES-2(c) Bus shelters and other ancillary facilities constructed as part of roadway improvements under the 2018 RTP/SCS shall be designed in accordance with the architectural review requirements of the local jurisdiction in which the project is proposed.

- b. Findings** – With the implementation of the above mitigation, impacts related to aesthetics and visual resources would be less than significant.
- c. Supportive Evidence** – Please refer to pages 2 through 3 of the Initial Study included in the Supplemental EIR as Appendix A.

B. Air Quality

- 1. Impact AQ-1.** Construction of transportation improvement projects and the land use pattern envisioned by the 2018 RTP/SCS would generate short-term air pollutant emissions. Due to the inclusion of a larger number of project, implementation of the 2018 RTP/SCS would potentially result in higher quantities of short-term air pollutant emissions than the implementation of the 2015 RTP/SCS. However, with mitigation, impacts would remain less than significant.
 - a. Mitigation** – SRTA recommends that individual project lead agencies implement the following mitigation measures for applicable transportation projects, including but not limited to projects listed in Appendix B of the Supplemental EIR. These measures can and should be implemented for future land development pursuant to the 2018 RTP/SCS that would involve construction activities.

AQ-1 The individual project lead agency shall ensure that all feasible and appropriate SCAQMD Standard Mitigation Measures (SMMS) and Best Available Mitigation Measures (BAMMs) are implemented. The measures shall be noted on all construction plans and the lead agency shall perform periodic site inspections. SCAQMD SMMs and BAMMs include, but are not limited to, the following:

Fugitive dust emissions:

- Implement all adequate dust control measures in a timely and effective manner during all phases of project development and construction;
- Water all excavated, stockpiled, or graded material to prevent fugitive dust from leaving property boundaries and causing a public nuisance or a violation of an ambient air standard. Watering shall occur at least twice daily with complete site coverage, preferably in the mid-morning and after work is completed each day;
- During initial grading, earth moving, or site preparation, construct a paved (or dust palliative treated) apron, at least 100 feet in length, onto the project site from the adjacent paved road(s);
- Sweep adjacent paved streets (recommend water sweeper with reclaimed water) at the end of each day if substantial volumes of soil materials have been carried onto adjacent public paved roads from the project site;
- Install sandbags or other erosion control measures to prevent silt runoff to roadways;
- Apply Department of Public Works approved non-toxic soil stabilizers (according to manufacturer's specifications) to all inactive construction areas (previously graded areas which remain inactive for 96 hours);
- Replant vegetation in disturbed areas as quickly as possible;
- Cover all trucks hauling soil, sand, and other loose materials, or require all trucks to maintain at least two feet of freeboard;
- Use wheel washers or wash off tires of all trucks exiting the construction site; and
- Mitigate fugitive dust emissions from wind erosion of areas disturbed from construction activities (including storage piles) by application of either water or chemical dust suppressant.

Exhaust emissions from diesel heavy equipment:

- Shut down equipment when not in use to limit engine idling time. Idling time shall be limited to no more than 3 minutes. This idling limit does not apply to circumstances as stated in the California Environmental Protection Agency Air Resources Board Advisory Number 377 (2008);
- Provide regular preventive equipment maintenance to prevent emission increases due to engine problems;
- Use low sulfur and low aromatic fuels meeting California standards for motor vehicle diesel fuel; and
- Use low-emitting gas and diesel engines meeting state and federal emissions standards (Tier I, II, III) for construction equipment.

Other emissions:

- Use low VOC coatings for the architectural coating phase of construction. All coatings must meet the VOC limits per SCAQMD Rule 3-31;

- Use asphalt mixtures appropriate for the time of year of application, while maintaining compliance with the lead agency's road design and construction standards;
 - Use alternatives to open burning of vegetative material on the project site, unless otherwise deemed infeasible by the SCAQMD. Among suitable alternatives are chipping, mulching, or conversion to biomass fuel;
 - Provide for temporary traffic control as appropriate during all phases of construction to improve traffic flow as deemed appropriate by the Department of Public Works and/or Caltrans; and
 - Schedule construction activities that direct traffic flow to off-peak hours as much as practicable.
- b. Findings** – With the implementation of the above mitigation, impacts related to short-term construction emissions would be less than significant.
- c. Supportive Evidence** – Please refer to pages 4.1-10 through 4.1-11 of the Final Supplemental EIR.
- 2. Impact AQ-3.** The transportation improvement projects and the land use scenario envisioned by the 2018 RTP/SCS may facilitate increased exposure of sensitive receptors to hazardous air pollutants that may cause health risks and odors that may be a nuisance. However, implementation of the 2018 RTP/SCS would not result in a regional increase in toxic air emissions when compared to the baseline or 2040 No Project Scenarios and would have similar localized impacts as those described in the 2015 RTP/SCS EIR. Impacts would remain significant but mitigable.
- a. Mitigation** – SRTA recommends that individual project lead agencies implement the following mitigation measures for future land development pursuant to the 2018 RTP/SCS that would be located in proximity to major transportation corridors:

AQ-3 Consistent with the provisions contained in the CARB Air Quality and Land Use Handbook (June 2005), lead agencies shall identify appropriate and feasible measures to be incorporated into project building design for residential, school and other sensitive uses located within 500 feet of freeways, heavily travelled arterials, railways and other sources of DPM and other known carcinogens. The appropriate measures shall include one or more of the following methods as applicable:

The lead agency shall retain a qualified air quality consultant to prepare a health risk assessment in accordance with CARB and the Office of Environmental Health and Hazard Assessment requirements to determine the exposure of project residents/occupants/users to stationary air quality pollutants prior to issuance of a demolition, grading, or building permit. The health risk assessment shall be submitted to the Lead Agency for review and approval. The lead agency shall implement any approved health risk assessment recommendations to a level which would not result in exposure of sensitive receptors to substantial pollutant concentrations. Such measures may include:

- Do not locate sensitive receptors near the entry and exit points of a distribution center.
- Do not locate sensitive receptors in the same building as a perchloroethylene dry cleaning facility.
- Maintain a 50-foot buffer from a typical gas dispensing facility (under 3.6 million gallons of gas per year).

- Install, operate and maintain in good working order a central heating and ventilation system or other air take system in the building, or in each individual residential unit, that meets the efficiency standard of the minimum efficiency reporting value 13. The heating and ventilation system should include the following features: Installation of a high-efficiency filter and/or carbon filter-to-filter particulates and other chemical matter from entering the building. Either high-efficiency particulate absorption filters or American Society of Heating, Refrigeration and Air-Conditioning Engineers 85% supply filters should be used.
 - Retain a qualified heating and ventilation consultant or high-efficiency particulate absorption rate during the design phase of the project to locate the heating and ventilation system based on exposure modeling from the mobile and/or stationary pollutant sources.
 - Maintain positive pressure within the building.
 - Achieve a performance standard of at least one air exchange per hour of fresh outside filtered air.
 - Achieve a performance standard of at least 4 air exchanges per hour of recirculation.
 - Achieve a performance standard of 0.25 air exchanges per hour of unfiltered infiltration if the building is not positively pressurized.
- b. Findings** – With the implementation of the above mitigation, impacts related to potential health risks would be less than significant.
- c. Supportive Evidence** – Please refer to pages 4.1-12 through 4.1-14 of the Final Supplemental EIR.

C. Biological Resources

- 1. Impacts.** Implementation of transportation improvements proposed, and the land use scenario envisioned by the 2018 RTP/SCS may result in impacts to special status plant and animal species, riparian habitat or other sensitive natural communities, or conflicts with local policies and ordinances protecting biological resources. Impacts would be significant but mitigable.
 - a. Mitigation** – SRTA recommends that individual project lead agencies implement the following mitigation measures for applicable transportation projects, including but not limited to those projects identified under the 2018 RTP/SCS. These measures can and should be implemented for future land development pursuant to the 2018 RTP/SCS that would result in impacts to special status animal and plant species.

B-1(a) Biological Resources Screening and Assessment. Because of the programmatic nature of the 2018 RTP/SCS and specific impacts for a given project are unknown at this time, on a project-by-project basis upon completion of final design, a preliminary biological resource screening shall be performed as part of the environmental review process to determine whether the project has any potential to impact biological resources. If it is determined that the project has no potential to impact biological resources, no further action is required. If the project would have the potential to impact biological resources, prior to construction, a qualified biologist shall conduct a biological resource assessment (BRA) or similar type of study to document the existing biological resources within the project footprint plus a buffer and to determine the potential impacts to those resources. The BRA shall evaluate the potential for

impacts to all biological resources including, but not limited to special status species, nesting birds, wildlife movement corridors, potential for installation or retrofitting of existing structures for wildlife movement corridors, evaluation of culverts or other watercourse structures to remove barriers to fish passage, sensitive plant communities/critical habitat, and other resources judged to be sensitive by local, state, and/or federal agencies. Pending the results of the BRA, design alterations, further technical studies (i.e. protocol surveys) and/or consultations with the USFWS, CDFW and/or other local, state, and federal agencies may be required. The following mitigation measures [B-1(b) through B-1(i)] shall be incorporated, only as applicable, into the BRA for projects where specific resources are present or may be present and impacted by the project. Note that specific surveys described in the mitigation measures below may be completed as part of the BRA where suitable habitat is present.

B-1(b) Special Status Plant Species Surveys. If completion of the project-specific BRA determines that special status plant species may occur on-site, surveys for special status plants shall be completed prior to any vegetation removal, grubbing, or other construction activity of each segment (including staging and mobilization). The surveys shall be floristic in nature and shall be seasonally timed to coincide with the target species identified in the project-specific BRA. All plant surveys shall be conducted by a qualified biologist approved by the implementing agency no more than two years before initial ground disturbance. All special status plant species identified on-site shall be mapped onto a site-specific aerial photograph and topographic map. Surveys shall be conducted in accordance with the most current protocols established by the CDFW, USFWS, and the local jurisdictions if said protocols exist. A report of the survey results shall be submitted to the implementing agency, and the CDFW and/or USFWS, as appropriate, for review and approval.

B-1(c) Special Status Plant Species Avoidance, Minimization, and Mitigation. If state listed or California Rare Plant List 1B species are found during special status plant surveys [pursuant to mitigation measure B-1(b)], then the project shall be re-designed to avoid impacting these plant species, if feasible. Rare plant occurrences that are not within the immediate disturbance footprint but are located within 50 feet of disturbance limits shall have bright orange protective fencing installed at least 30 feet beyond their extent, or other distance as approved by a qualified biologist, to protect them from harm.

B-1(d) Restoration and Monitoring. If special status plants species cannot be avoided and will be impacted by a project implemented under the 2018 RTP/SCS, all impacts shall be mitigated at a minimum ratio of 2:1 (number of acres/individuals restored to number of acres/individuals impacted) for each species as a component of habitat restoration. A restoration plan shall be prepared and submitted to the jurisdiction overseeing the project for approval. (Note: if a state-listed plant species will be impacted, the restoration plan shall be submitted to the CDFW for approval). The restoration plan shall include, at a minimum, the following components:

- Description of the project/impact site (i.e., location, responsible parties, areas to be impacted by habitat type).
- Goal(s) of the compensatory mitigation project [type(s) and area(s) of habitat to be established, restored, enhanced, and/or preserved; specific functions and values of habitat type(s) to be established, restored, enhanced, and/or preserved].
- Description of the proposed compensatory mitigation site (location and size, ownership status, existing functions, and values).
- Implementation plan for the compensatory mitigation site (rationale for expecting implementation success, responsible parties, schedule, site preparation, planting plan).
- Maintenance activities during the monitoring period, including weed removal as appropriate (activities, responsible parties, schedule).

- Monitoring plan for the compensatory mitigation site, including no less than quarterly monitoring for the first year (performance standards, target functions, and values, target acreages to be established, restored, enhanced, and/or preserved, annual monitoring reports).
- Success criteria based on the goals and measurable objectives; said criteria to be, at a minimum, at least 80 percent survival of container plants and 30 percent relative cover by vegetation type.
- An adaptive management program and remedial measures to address any shortcomings in meeting success criteria.
- Notification of completion of compensatory mitigation and agency confirmation.
- Contingency measures (initiating procedures, alternative locations for contingency compensatory mitigation, funding mechanism).

B-1(e) Endangered/Threatened Species Habitat Assessment and Protocol Surveys.

Specific habitat assessment and survey protocol surveys are established for several federally and state endangered or threatened species. If the results of the BRA determine that suitable habitat may be present any such species, protocol habitat assessments/surveys shall be completed in accordance with CDFW and/or USFWS protocols prior to issuance of any construction permits. If through consultation with the CDFW and/or USFWS it is determined that protocol habitat assessments/surveys are not required, said consultation shall be documented prior to issuance of any construction permits. Each protocol has different survey and timing requirements. The applicants for each project shall be responsible for ensuring they understand the protocol requirements.

B-1(f) Endangered/Threatened Species Avoidance and Minimization. The habitat requirements of endangered and threatened species throughout Shasta County are highly variable. The potential impacts from any given project implemented under the 2018 RTP/SCS are likewise highly variable. However, there are several avoidance and minimization measures that can be applied for a variety of species to reduce the potential for impact, with the final goal of no net loss of the species. The following measures may be applied to aquatic and/or terrestrial species. Project lead agencies shall select from these measures as appropriate. Additionally, projects with the potential to affect endangered or threatened state and federal species may require taking authorization from CDFW and/or USFWS.

- Ground disturbance shall be limited to the minimum necessary to complete the project. The project limits of disturbance shall be flagged. Areas of special biological concern within or adjacent to the limits of disturbance shall have highly visible orange construction fencing installed between said area and the limits of disturbance.
- All projects occurring within/adjacent to aquatic habitats (including riparian habitats and wetlands) shall be completed during the typical low flow period or when water is unlikely to be present (generally between April 1 and October 31), if feasible, to avoid impacts to sensitive aquatic species. Additional timing restrictions shall be incorporated into the project schedule on a species by species basis in coordination with the resource agencies (e.g. National Marine Fisheries Service, CDFW, USFWS).
- All projects occurring within or adjacent to sensitive habitats that may support federally and/or state endangered/threatened species shall have a CDFW and/or USFWS-approved biologist present during all initial ground disturbing/vegetation-clearing activities. Once initial ground disturbing/vegetation clearing activities have been completed, said biologist

shall conduct daily pre-activity clearance surveys for endangered/threatened species. Alternatively, and upon approval of the CDFW and/or USFWS, said biologist may conduct site inspections at a minimum of once per week to ensure all prescribed avoidance and minimization measures are being fully implemented.

- No endangered/threatened species shall be captured and relocated without expressed permission from the CDFW and/or USFWS.
- If at any time during construction of the project an endangered/threatened species enters the construction site or otherwise may be impacted by the project, all project activities shall cease. A CDFW/USFWS-approved biologist shall document the occurrence and consult with the CDFW and/or USFWS as appropriate.
- For all projects occurring in areas where endangered/ threatened species may be present and are at risk of entering the project site during construction, exclusion fencing shall be placed along the project boundaries prior to start of construction (including staging and mobilization). The placement of the fence shall be at the discretion of the CDFW/USFWS-approved biologist. This fence shall consist of solid silt fencing placed at a minimum of 3 feet above grade and 2 feet below grade and shall be attached to wooden stakes placed at intervals of not more than 5 feet. The fence shall be inspected daily and following rain events and high wind events and shall be maintained in good working condition until all construction activities are complete.
- All vehicle maintenance/fueling/staging shall occur not less than 100 feet from any riparian habitat or water body. Suitable containment procedures shall be implemented to prevent spills. A minimum of one spill kit shall be available at each work location near riparian habitat or water bodies.
- No equipment shall be permitted to enter wetted portions of any affected drainage channel.
- All equipment operating within streams shall be in good conditions and free of leaks. Spill containment shall be installed under all equipment staged within stream areas and extra spill containment and clean up materials shall be located in close proximity for easy access.
- If project activities could degrade water quality, water quality sampling shall be implemented to identify the pre-project baseline and to monitor during construction for comparison to the baseline.
- If water is to be diverted around work sites, a diversion plan shall be submitted (depending upon the species that may be present) to the CDFW, RWQCB, USFWS, and/or NMFS for their review and approval prior to the start of any construction activities (including staging and mobilization). If pumps are used, all intakes shall be completely screened with wire mesh not larger than five millimeters to prevent animals from entering the pump system.
- At the end of each workday, excavations shall be secured with a cover or a ramp provided to prevent wildlife entrapment.
- All trenches, pipes, culverts or similar structures shall be inspected for animals prior to burying, capping, moving, or filling.

- The CDFW/USFWS-approved biologist shall remove invasive aquatic species such as bullfrogs and crayfish from suitable aquatic habitat whenever observed and shall dispatch them in a humane manner and dispose of properly.
- If any federally and/or state protected species are harmed, the CDFW/USFWS-approved biologist shall document the circumstances that led to harm and shall determine if project activities should cease or be altered in an effort to avoid additional harm to these species. Dead or injured special status species shall be disposed of at the discretion of the CDFW and USFWS. All incidences of harm shall be reported to the CDFW and USFWS within 48 hours.
- Considering the potential for projects to impact federal and state listed species and their habitat, SRTA, and lead agencies shall contact the CDFW and USFWS to identify mitigation banks within Shasta County during the development of the RTP. Upon implementation of projects included in the RTP, but on a project-by-project basis, if the results of the BRA determine that impacts to federal and state threatened or endangered species habitat are expected, lead agencies shall explore species-appropriate mitigation bank(s) servicing the county for the purchase of mitigation credits. If mitigation banks or credits are not available, mitigation options may include but are not limited to, onsite or offsite habitat creation and restoration, land acquisitions, and conservation easements.

B-1(g) Non-Listed Special Status Animal Species Avoidance and Minimization.

Several State Species of Special Concern may be impacted by projects implemented under the 2018 RTP/SCS. The ecological requirements and potential for impacts are highly variable among these species. Depending on the species identified in the BRA, several of the measures identified under B-1(f) shall be applicable to the project. In addition, measures shall be selected from among the following to reduce the potential for impacts to non-listed special status animal species:

- For non-listed special-status terrestrial amphibians and reptiles, cover-board surveys shall be completed within three months of the start of construction. The cover-boards shall be at least four feet by four feet and constructed of untreated plywood placed flat on the ground. The cover-boards shall be checked by a qualified biologist once per week for each week after placement up until the start of vegetation removal. All non-listed special status and common animals found under the cover-boards shall be captured and placed in five-gallon buckets for transportation to relocation sites. All relocation sites shall be reviewed by the project lead agency and shall consist of suitable habitat. Relocation sites shall be as close to the capture site as possible but far enough away to ensure the animal(s) is not harmed by construction of the project. Relocation shall occur on the same day as capture. If a relocation site immediately adjacent to the project site is unavailable, the CDFW shall be consulted to determine an appropriate relocation site. CNDDDB Field Survey Forms shall be submitted to the CDFW for all special-status animal species observed.
- Pre-construction clearance surveys shall be conducted within 14 days of the start of construction (including staging and mobilization). The surveys shall cover the entire disturbance footprint plus a minimum 200-foot buffer, if feasible, and shall identify all special status animal species that may occur on-site. All non-listed special-status species shall be relocated from the site either through direct capture or through passive exclusion (e.g., American badger). A report of the pre-construction survey shall be submitted to the lead agency for their review and approval prior to the start of construction.

- A qualified biologist shall be present during all initial ground disturbing activities, including vegetation removal to recover special status animal species unearthed by construction activities.
- Upon completion of the project, a qualified biologist shall prepare a Final Compliance report documenting all compliance activities implemented for the project, including the pre-construction survey results. The report shall be submitted within 30 days of completion of the project to the project lead agency and CDFW.
- If special-status bat species may be present and impacted by the project, a qualified bat biologist shall conduct within 30 days of the start of construction presence/absence surveys for special-status bats in consultation with the CDFW where suitable roosting habitat is present. Surveys shall be conducted using acoustic detectors and by searching tree cavities, crevices, and other areas where bats may roost. If active roosts are located, exclusion devices such as netting shall be installed to discourage bats from occupying the site. If a roost is determined by a qualified bat biologist to be used by a large number of bats (large hibernaculum), bat boxes shall be installed near the project site. The number of bat boxes installed will depend on the size of the hibernaculum and shall be determined through consultations with the CDFW. If a maternity colony has become established, all construction activities shall be postponed within a 500-foot buffer around the maternity colony until it is determined by a qualified bat biologist that the young have dispersed. If it is determined that a maternity colony would be removed, it would be done only if the roost is clear of bats. The decision on whether or not the maternity roost would be removed shall be made in consultation with CDFW.

B-1(h) Preconstruction Surveys for Nesting Birds for Construction Occurring within Nesting Season. For projects that may result in tree felling or removal of trees or vegetation that may contain a nesting bird, if feasible, construction activities should occur generally between September 16 to January 31 (thus outside of the nesting season). However, if construction activities must during the nesting season (generally February 1 to September 15), surveys for nesting birds covered by the California Fish and Game Code and the Migratory Bird Treaty Act shall be conducted by a qualified biologist no more than 7 days prior to vegetation removal. The surveys shall include the entire segment disturbance area plus a 200-foot buffer around the site. If active nests are located, all construction work shall be conducted outside a buffer zone from the nest to be determined by the qualified biologist. The buffer shall be a minimum of 50 feet for non-raptor bird species and at least 150 feet for raptor species or as determined in consultation with CDFW and/or USFWS. Larger buffers may be required depending upon the status of the nest and the construction activities occurring in the vicinity of the nest. The buffer area(s) shall be closed to all construction personnel and equipment until the adults and young are no longer reliant on the nest site. A qualified biologist shall confirm that breeding/nesting is completed and young have fledged the nest prior to removal of the buffer. A report of these preconstruction nesting bird surveys shall be submitted to the lead agency to document compliance and to the CDFW.

B-1(i) Worker Environmental Awareness Program (WEAP). Prior to initiation of construction activities for applicable projects (including staging and mobilization), all personnel associated with project construction shall attend WEAP training, conducted by a qualified biologist, to aid workers in recognizing special status resources that may occur in the project area. The specifics of this program shall include identification of the sensitive species and habitats, a description of the regulatory status and general ecological characteristics of sensitive resources, and review of the limits of construction and mitigation measures required to reduce impacts to biological resources within the work area. A fact sheet conveying this

information shall also be prepared for distribution to all contractors, their employers, and other personnel involved with the construction of the project. All employees shall sign a form documenting provided by the trainer indicating they have attended the WEAP and understand the information presented to them. The form shall be submitted to the lead agency to document compliance.

B-1(j) Tree Protection. If it is determined that construction may impact trees protected by local agencies, the project lead agency shall procure all necessary tree removal permits. A certified arborist shall develop a tree protection and replacement plan as appropriate. The plan shall include, but would not be limited to, an inventory of trees to within the construction site, setbacks from trees and protective fencing, restrictions regarding grading and paving near trees, direction regarding pruning and digging within the root zone of trees, and requirements for replacement and maintenance of trees. If protected trees will be removed, replacement tree plantings of like species in accordance with local agency standards, but at a minimum ratio of 2:1 (trees planted to trees impacted), shall be installed on-site or at an approved off-site location and a restoration and monitoring program shall be developed in accordance with B-1(d) and shall be implemented for a minimum of seven years or until stasis has been determined by certified arborist. If a protected tree shall be encroached upon but not removed, a certified arborist shall be present to oversee all trimming of roots and branches.

b. Findings – Compliance with the above mitigation measures and all existing state, local and/or federal regulations would reduce impacts to a less than significant level.

c. Supportive Evidence – Please refer to pages 9 through 16 of the Initial Study included in the Supplemental EIR as Appendix A.

2. Impacts. Implementation of transportation improvements proposed, and the land use scenario envisioned by the 2018 RTP/SCS may result in impacts to sensitive habitats, including federally protected wetlands. This impact would be significant but mitigable.

a. Mitigation – SRTA recommends that individual project lead agencies implement the following mitigation measures for applicable transportation projects, including but not limited to those projects identified under the 2018 RTP/SCS. These measures can and should be implemented for future development pursuant to the 2018 RTP/SCS that would result in impacts to sensitive habitats. Mitigation measures B-2(c) and B-2(d) also address the potential for impacts due to invasive plant species.

B-2(a) Jurisdictional Delineation. If projects implemented under the 2018 RTP/SCS occur within or adjacent to wetland, drainages, riparian habitats, or other areas that may fall under the jurisdiction of the CDFW, USACE, and/or RWQCB, a qualified biologist shall complete a jurisdictional delineation. The jurisdictional delineation shall determine the extent of the jurisdiction for each of these agencies and shall be conducted in accordance with the requirement set forth by each agency. The result shall be a preliminary jurisdictional delineation report that shall be submitted to the implementing agency, USACE, RWQCB, and CDFW, as appropriate, for review and approval. If jurisdictional areas are expected to be impacted, then the RWQCB would require a Waste Discharge Requirements (WDR) permit and/or Section 401 Water Quality Certification (depending upon whether or not the feature falls under federal jurisdiction). If CDFW asserts its jurisdictional authority, then a Streambed Alteration Agreement pursuant to Section 1600 et seq. of the California Fish and Game Code would also be required prior to construction within the areas of CDFW jurisdiction. If the USACE asserts its authority, then a permit pursuant to Section 404 of the Clean Water Act would likely be required.

B-2(b) Wetland and Riparian Habitat Restored. Impacts to jurisdictional wetland and riparian habitat shall be mitigated at a minimum ratio of 2:1 (acres of habitat restored to acres impacted) and shall occur on-site or as close to the impacted habitat as possible. A mitigation and monitoring plan shall be developed by a qualified biologist in accordance with mitigation measure B-1(d) above and shall be implemented for no less than five years after construction of the segment, or until the lead agency and/or the permitting authority (e.g., CDFW or USACE) has determined that restoration has been successful. Alternately, mitigation may occur through the purchase of credits at a USACE approved mitigation bank or contribution to the USACE in-lieu fee program within the USACE Sacramento District. If mitigation is required through a Lake or Streambed Alteration Agreement, the mitigation bank or purchase of credits in an in-lieu fee program shall be approved by CDFW.

B-2(c) Landscaping Plan. If landscaping is proposed for projects occurring within or adjacent to sensitive habitats, a qualified biologist/landscape architect shall prepare a landscape plan for that project. This plan shall indicate the locations and species of plants to be installed. Drought tolerant, locally native plant species shall be used. Noxious, invasive, and/or non-native plant species that are recognized on the Federal Noxious Weed List, California Noxious Weeds List, and/or California Invasive Plant Council Lists 1, 2, and 4 shall not be permitted. Species selected for planting shall be similar to those species found in adjacent native habitats and if feasible, locally collected seeds and plants shall be used.

B-2(d) Invasive Weed Prevention and Management Program. Prior to the start of construction for projects occurring within or adjacent to sensitive habitats, an Invasive Weed Prevention and Management Program shall be developed by a qualified biologist to prevent invasion of native habitat by non-native plant species. A list of target species shall be included, along with measures for early detection and eradication. All disturbed areas shall be hydroseeded with a mix of locally native species upon completion of work in those areas. In areas where construction is ongoing, hydroseeding shall occur where no construction activities have occurred within six (6) weeks since ground disturbing activities ceased. If exotic species invade these areas prior to hydroseeding, weed removal shall occur in consultation with a qualified biologist and in accordance with the restoration plan.

b. Findings – Compliance with the above mitigation measures and existing State, local and/or federal regulations would reduce impacts to a less than significant level.

c. Supportive Evidence – Please refer to pages 16 through 18 of the Initial Study included in the Supplemental EIR as Appendix A.

D. Energy

1. Impacts. Some proposed transportation projects included in and the land use scenario envisioned in the 2018 RTP/SCS would increase the overall demand for energy beyond existing conditions. However, such land use development would not require unusual, unnecessary, or wasteful amounts of energy as future infill development projects would be subject to the California Green Building Standards Code and Title 24 of the California Energy Code, which set forth specific energy efficiency requirements related to design construction methods and materials. This impact would be less than significant with mitigation, similar to the finding in the 2015 RTP EIR.

a. Mitigation – The following mitigation measures are provided as measures that could be implemented to reduce energy consumption. Project-specific environmental impacts may require these measures be revised or expanded in response to site-specific conditions.

E-1(a) New facilities should be designed with energy-efficient equipment and passive solar design (e.g., orientation of building to maximize natural heating and cooling, solar water heating, use of daylighting, and placement of trees to aid passive cooling, protection from

prevailing winds, and maximum year-round solar access), provided that additional capital costs are offset by estimated energy savings during the first five years of operation. Additional improvements with longer payback periods, such as photovoltaic solar electric systems, should be considered where applicable.

E-1(b) All lighting should be energy efficient and designed to use the least amount of energy to serve the purpose of the lighting. Lighting should utilize solar energy wherever feasible.

E-1(c) New landscaping design and irrigation systems should be water efficient. To the extent possible, reclaimed water should be used for roadside landscape irrigation.

- b. Findings** – Implementation of the above measures would reduce potential impacts to a less than significant level.
- c. Supportive Evidence** – Please refer to pages 24 through 25 of the Initial Study included in the Supplemental EIR as Appendix A.

E. Geology and Soils

- 1. Impacts.** Some proposed projects included in the 2018 RTP/SCS could be at risk from seismic activity. Although fault rupture and seismically induced liquefaction do not pose a substantial threat in Shasta County, ground-shaking may affect 2018 RTP/SCS projects. Additionally, some projects included in the 2018 RTP/SCS may be located on unstable soils subject to landslides or on expansive soils. This is considered a significant but mitigable impact.

- a. Mitigation** – SRTA recommends that individual project lead agencies implement the following mitigation measures for applicable transportation projects, including but not limited to those projects identified under the 2018 RTP/SCS. These measures can and should also be implemented for all projects developed pursuant to the 2018 RTP/SCS that would result in seismic impacts or impacts related to expansive or unstable soils, including landslides.

G-1 The lead agency in which a particular 2018 RTP/SCS bridge project is located shall ensure that the structure is designed and constructed to the latest geotechnical standards. In most cases, this will necessitate site-specific geologic and soils engineering investigations to exceed the code for high ground shaking zones. This can be accomplished through the placement of conditions on the project by the lead agency during the individual environmental review.

G-2 If an RTP project involves cut slopes over 15 feet in height, the lead agency in which the project is located shall ensure that specific slope stabilization studies are conducted. Possible stabilization methods include buttresses, retaining walls and soldier piles.

- b. Findings** – Implementation of the above measures would reduce potential impacts to a less than significant level.
- c. Supportive Evidence** – Please refer to pages 28 and 29 of the Initial Study included in the EIR as Appendix A.

F. Greenhouse Gas Emissions

- 1. Impact GHG-1.** Construction of the transportation improvement projects and future land use patterns envisioned by the 2018 RTP/SCS would generate temporary short-term GHG emissions. Due to the inclusion of a larger number of projects, implementation of 2018 RTP/SCS would potentially result in higher quantities of short-term emissions than the implementation of the 2015 RTP/SCS. However, with mitigation, impacts would remain less than significant.

- a. **Mitigation** – SRTA recommends that individual project lead agencies implement the following mitigation measures for applicable transportation projects, including but not limited to projects listed in Appendix B of the Supplement EIR. These measures can and should be implemented for future land development pursuant to the 2018 RTP/SCS that would involve construction activities.

GHG-1 The individual project lead agency shall ensure that applicable GHG-reducing diesel particulate and NO_x emissions measures for off-road construction vehicles are implemented during construction. The measures shall be noted on all construction plans and the lead agency shall perform periodic site inspections. Applicable GHG-reducing measures include the following.

- Use of diesel construction equipment meeting CARB's Tier 2 certified engines or cleaner off-road heavy-duty diesel engines, and comply with the State Off-Road Regulation;
 - Use of on-road heavy-duty trucks that meet the CARB's 2007 or cleaner certification standard for on-road heavy-duty diesel engines, and comply with the State On-Road Regulation;
 - All on and off-road diesel equipment shall not idle for more than 5 minutes. Signs shall be posted in the designated queuing areas and or job sites to remind drivers and operators of the 5-minute idling limit;
 - Use of electric equipment in place of diesel-powered equipment, where feasible;
 - Substitute gasoline-powered in place of diesel-powered equipment, where feasible;
 - Use of alternatively fueled construction equipment on-site where feasible, such as compressed natural gas (CNG), liquefied natural gas (LNG), propane or biodiesel, in place of diesel-powered equipment for 15 percent of the fleet;
 - Use of materials sourced from local suppliers;
 - Recycling of at least 65 percent of construction waste materials.
- b. **Findings** – With the implementation of the above mitigation, impacts related to short-term GHG emissions would be less than significant.
- c. **Supportive Evidence** – Please refer to pages 4.2-10 through 4.2-1 of the Final Supplemental EIR.

G. Hydrology and Water Quality

1. **Impacts.** Implementation of proposed transportation improvements and future land use development scenario envisioned in the 2018 RTP/SCS would incrementally increase countywide water demand. Implementation of the 2018 RTP/SCS could result in soil erosion during construction, and increase stormwater runoff, potentially degrading water quality. Some projects included in the 2018 RTP/SCS would be subject to inundation from a 100-year flood event or dam failure. Such impacts would be significant but mitigable.
- a. **Mitigation** – SRTA shall implement the following mitigation measures developed for the 2018 RTP/SCS where applicable for transportation projects that result in impacts related to increased water demand or decreased aquifer recharge, soil erosion, increased stormwater

runoff exceeding the capacity of a drainage system or degrading water quality, or inundation from flooding or dam failure. Cities and counties in the SRTA region can and should implement these measures, where relevant to land use projects implementing the 2018 RTP/SCS. Project-specific environmental documents may adjust these mitigation measures as necessary to respond to site-specific conditions.:

W-1(a) The individual lead agency of a 2018 RTP/SCS project shall ensure that, where economically feasible, reclaimed water is used for dust suppression during construction activities. This measure shall be noted on construction plans and shall be spot checked by the lead agency.

W-1(b) The individual lead agency of a 2018 RTP/SCS project shall ensure that low water use landscaping (i.e., drought tolerant plants and drip irrigation) is installed. When feasible, native plant species shall be used.

W-1(c) The individual lead agency of a 2018 RTP/SCS project shall ensure that if feasible, landscaping associated with proposed improvements is maintained using reclaimed water.

W-1(d) The individual lead agency of a 2018 RTP/SCS project shall ensure that porous pavement materials are utilized, where feasible, to allow for groundwater percolation.

W-1(e) The individual lead agency of a 2018 RTP/SCS project that requires potable water service should coordinate with water supply system operators to ensure that the existing water supply systems have the capacity to handle the increase. If the current infrastructure servicing the project site is found to be inadequate, infrastructure improvements for the appropriate public service or utility should be provided by the project sponsor. In addition, wherever feasible, reclaimed water should be used for landscaping purposes instead of potable water.

W-2(a) The lead agency of a 2018 RTP/SCS project shall ensure that fertilizer/pesticide application plans for any new right-of-way landscaping are prepared to minimize deep percolation of contaminants. The plans shall specify the use of products that are safe for use in and around aquatic environments.

W-2(b) The lead agency of a 2018 RTP/SCS widening or roadway extension project shall ensure that the improvement directs runoff into subsurface percolation basins and traps which would allow for the removal of urban pollutants, fertilizers, pesticides, and other chemicals.

W-2(c) For a 2018 RTP/SCS project that would disturb at least one acre, an SWPPP shall be developed prior to the initiation of grading and implemented for all construction activity on the project site. The SWPPP shall include specific BMPs to control the discharge of material from the site and into the creeks and local storm drains. BMP methods may include, but would not be limited to, the use of temporary retention basins, straw bales, sand bagging, mulching, erosion control blankets, and soil stabilizers.

W-3(a) If a 2018 RTP/SCS project is located in an area with high flooding potential due to a storm event or dam inundation, the individual project lead agency shall ensure that the structure is elevated at least one foot above the 100-year flood zone elevation and that bank stabilization and erosion control measures are implemented along creek crossings.

W-3(b) For 2018 RTP/SCS projects within a dam failure inundation hazard zone, the

project's lead agency shall ensure that a comprehensive flood risk communication strategy is developed, which would include an evacuation plan and/or an Emergency Action Plan and promote dam failure risk awareness and safety.

- b. **Findings** – Implementation of the above measures would reduce potential impacts to a less than significant level.
- c. **Supportive Evidence** – Please refer to pages 36 through 39 of the Initial Study included in the Supplemental EIR as Appendix A.

H. Land Use and Planning

1. **Impacts.** Implementation of proposed transportation improvements and the land use scenario envisioned by the 2018 RTP/SCS could result in land use conflicts with existing sensitive land uses. This is considered a significant but mitigable impact.
 - a. **Mitigation** – Mitigation measures listed under Impact AQ-1 and AQ-3 in the Air Quality section would reduce localized air quality impacts. Mitigation measures listed under Impacts N-1, N-2, and N-3, in the Noise section, would reduce potential noise impacts. No mitigation is required for impacts related to dividing established communities.
 - b. **Findings** – Land use compatibility impacts and related air quality and noise impacts would be less than significant with the implementation of mitigation measures referenced above.
 - c. **Supportive Evidence** – Please refer to Section 4.1, *Air Quality*, on pages 4.1-10 through 4.1-14 of the Final Supplemental EIR, and page 44 through 46 of the Initial Study included in the Supplemental EIR as Appendix A.
2. **Impacts.** Implementation of proposed transportation improvements and the land use scenario envisioned by the 2018 RTP/SCS could temporarily and/or permanently displace or disrupt existing residences and businesses. This is considered a significant but mitigable impact.
 - a. **Mitigation** – SRTA recommends that individual project lead agencies implement the following mitigation measures for applicable transportation projects that may result in potential impacts relating to temporary disturbance to and/or permanent displacement of residences and businesses.

LU-2(a) The project lead agency of RTP projects with the potential to displace residences or businesses should assure that project-specific environmental reviews consider alternative alignments and developments that avoid or minimize impacts to nearby residences and businesses.

LU-2(b) Where project-specific reviews identify displacement or relocation impacts that are unavoidable, the individual project lead agency should ensure that all applicable local, state, and federal relocation programs are used to assist eligible persons to relocate. In addition, the lead agency shall review the proposed construction schedules to ensure that adequate time is provided to allow affected businesses to find and relocate to other sites.

LU-2(c) For all RTP projects that could result in temporary lane closures or access blockage during construction, a temporary access plan should be implemented by the lead agency to ensure continued access to affected cyclists, businesses, and homes. Appropriate signs and safe access shall be guaranteed during project construction to ensure that businesses remain open.

- b. **Findings** -Implementation of recommended measures would mitigate impacts relating to temporary disturbance and long-term displacement to a less than significant level.

- c. **Supportive Evidence** - Please refer to pages 40 through 41 of the Initial Study included in the Supplemental EIR as Appendix A.

I. Noise

1. **Impact N-1.** Construction activity associated with transportation improvement projects and development envisioned by the 2018 RTP/SCS would create temporary noise level increases in discrete locations throughout the County. Impacts would be significant but mitigable.
 - a. **Mitigation** –SRTA recommends that individual project lead agencies implement the following mitigation measures for applicable transportation projects. These measures can and should be implemented for all projects developed pursuant to the 2018 RTP/SCS that would result in temporary construction noise and/or vibration impacts. Project-specific environmental impacts may require these mitigation measures be revised or expanded in response to site-specific conditions:
 - N-1(a)** Lead agencies of 2018 RTP/SCS projects shall ensure that, where residences or other noise sensitive uses are located within 800 feet of construction sites, appropriate measures shall be implemented to ensure consistency with local noise ordinance requirements relating to construction. Specific techniques may include, but are not limited to, restrictions on construction timing, use of sound blankets on construction equipment, and the use of temporary walls and noise barriers to block and deflect noise.
 - N-1(b)** For any project the requires pilings and is located within 800 feet of sensitive receptors, the project lead agencies shall require the use of pile drilling techniques instead, where feasible. This shall be accomplished through the placement of conditions on the project during its individual environmental review.
 - N-1 (c)** Lead agencies shall ensure that equipment and trucks used for project construction utilize the best available noise control techniques (including mufflers, use of intake silencers, ducts, engine enclosures and acoustically attenuating shields or shrouds).
 - N-1(d)** Lead agencies shall ensure that impact equipment (e.g., jack hammers, pavement breakers, and rock drills) used for project construction be hydraulically or electrically powered, wherever feasible, to avoid noise associated with compressed air exhaust from pneumatically powered tools. Where the use of pneumatically powered tools is unavoidable, use of an exhaust muffler (reduces noise by up to 10 dBA) or external jackets (reduces noise by up to 5 dBA.) is encouraged. Whenever feasible, use of quieter procedures, such as drilling is encouraged.
 - N-1(e)** Locate stationary noise sources as far from sensitive receptors as possible. Stationary noise sources that must be located near existing receptors will be adequately muffled.
 - b. **Findings** – With the implementation of local noise control requirements and mitigation measures listed above, impacts would be reduced to a less than significant level.
 - c. **Supportive Evidence** – Please refer to pages 43 through 45 of the Initial Study included in the Supplemental EIR as Appendix A.
2. **Impacts.** Implementation of the 2018 RTP/SCS would increase traffic-generated noise levels on highways and roadways which could expose sensitive receptors to noise in excess of normally acceptable levels. This is a significant but mitigable impact.
 - a. **Mitigation** – SRTA recommends that individual project lead agencies implement the following mitigation measures for applicable transportation projects. These measures can and should be implemented for all projects developed pursuant to the 2018 RTP/SCS that would result in

traffic-related noise impacts. Project-specific environmental impacts may require these mitigation measures be revised or expanded in response to site-specific conditions:

N-2(a) Lead agencies of 2018 RTP/SCS projects that would result in noise exceeding normally acceptable levels shall complete detailed noise assessments using applicable guidelines (e.g., Federal Transit Administration Transit Noise and Vibration Impact Assessment for rail and bus projects and the California Department of Transportation Traffic Noise Analysis Protocol for roadway projects). The individual project lead agency shall ensure that a noise survey is conducted to determine potential alternate alignments which allow a greater distance from, or greater buffering of, noise-sensitive areas. The noise survey shall be sufficient to indicate existing and projected noise levels, to determine the amount of attenuation needed to reduce potential noise impacts to applicable state and local standards. This shall be accomplished during the project's individual environmental review as necessary.

N-2(b) Where new or expanded roadways or transit are found to expose receptors to noise exceeding normally acceptable levels, the individual project lead agency shall consider various sound attenuation techniques. The preferred methods for mitigating noise impacts will be the use of appropriate setbacks and sound attenuating building design, including the retrofit of existing structures with sound attenuating building materials where feasible. In instances where the use of these techniques is not feasible, the use of sound barriers (earthen berms, sound walls, or some combination of the two) will be considered. Long expanses of walls or fences should be interrupted with offsets and provided with accents to prevent monotony. Landscape pockets and pedestrian access through walls should be provided. Whenever possible, a combination of elements should be used, including open grade paving, solid fences, walls, and, landscaped berms. Determination of appropriate noise attenuation measures will be assessed on a case-by-case basis during a project's individual environmental review pursuant to the regulations of the applicable lead agency.

b. Findings – Implementation of the recommended programmatic measures would reduce potential impacts to a less than significant level.

c. Supportive Evidence – Please refer to pages 43 through 44 of the Initial Study included in the Supplemental EIR as Appendix A.

3. Impact N-3. The proposed 2018 RTP/SCS land use scenario would encourage infill development, which may place sensitive receptors in areas with unacceptable noise levels. This is a significant but mitigable impact.

a. Mitigation – SRTA recommends that individual project lead agencies implement the following mitigation measure for applicable transportation projects located in close proximity to noise sensitive uses that would result in impacts related noise exposure.

N-3 If a 2018 RTP/SCS project is located in an area with exterior ambient noise levels above local noise standards or in an area with potential cumulative noise levels above local noise standards (based on traffic volumes from regionally adopted travel demand model), the individual project lead agency shall ensure that a noise study is conducted to determine existing and projected noise levels and feasible attenuation measures needed to reduce potential noise impacts to such uses to an exterior and interior noise level below local standards. Such measures may include but are not limited to: dual-paned windows, solid core exterior doors with perimeter weather stripping, air condition system so that windows and doors may remain closed and situating exterior doors away from roads. This shall be accomplished during the project's individual environmental review.

b. Findings – Compliance with local general plans and implementation of the programmatic mitigation measure would reduce potential impacts to a less than significant level.

- c. **Supportive Evidence** – Please refer to page 45 of the Initial Study included in the Supplemental EIR as Appendix A.

J. Tribal Cultural Resources

1. **Impact TCR-1.** Implementation of proposed transportation improvements and future projects included in the land use scenario envisioned in the 2018 RTP/SCS has the potential to impact tribal cultural resources. Impacts would be less than significant with mitigation incorporated.

- a. **Mitigation** – SRTA recommends that individual project lead agencies implement the following mitigation measures for applicable transportation projects, including but not limited to projects included in Appendix B. These measures can and should be implemented for future land development pursuant to the 2018 RTP/SCS that would result in impacts to tribal cultural resources.

TCR-1(a) Identified Tribal Cultural Resources Impact Minimization. Implementing agencies shall comply with AB 52, which may require formal tribal consultation. If the implementing agency determines that a project may cause a substantial adverse change to a tribal cultural resource, they shall implement mitigation measures identified in the consultation process required under PRC Section 21080.3.2, or shall implement the following measures where feasible to avoid or minimize the project-specific significant adverse impacts:

- Avoidance and preservation of the resources in place, including, but not limited to: designing and building the project to avoid the resources and protect the cultural and natural context, or planning green space, parks, or other open space to incorporate the resources with culturally appropriate protection and management criteria.
- Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - Protecting the cultural character and integrity of the resource
 - Protecting the traditional use of the resource
 - Protecting the confidentiality of the resource
- Establishment of permanent conservation easements or other culturally appropriate property management criteria for the purposes of preserving or utilizing the resources or places.
- Native American monitoring by the appropriate tribe during soil disturbance for all projects in areas identified as sensitive for potential tribal cultural resources and/or in the vicinity (within 100 feet) of known tribal cultural resources

TCR-1(b) Unanticipated Tribal Cultural Resources Impact Minimization. If potential tribal cultural resources are encountered during ground-disturbing activities, work in the immediate area must halt and the appropriate tribal representative(s), the implementing agency, and an archaeologist meeting the Secretary of the Interior’s Professional Qualifications Standards for archaeology (National Park Service [NPS] 1983) shall be contacted immediately to evaluate the find. If in consultation with the implementing agency, the archaeologist and/or tribal representative determines the discovery to be a tribal cultural resource and thus, significant under CEQA, a mitigation plan shall be prepared and implemented in accordance with state

guidelines and in consultation with tribal representatives. If the resource cannot be avoided, a mitigation plan shall be developed to address tribal concerns.

- b. Findings** – Mitigation Measure TCR-1(a) would require implementation of mitigation identified through tribal consultation or other feasible mitigation to avoid impacts to identified tribal cultural resources. These measures would protect the resource’s character, traditional use, and confidentiality. Mitigation Measure TCR-1(b) would ensure that impacts to unanticipated tribal cultural resources activities would be mitigated in consultation with tribal representatives. Implementation of the above measures would reduce impacts to tribal cultural resources to a less than significant level.
- c. Supportive Evidence** – Please refer to Section 4.5, *Tribal Cultural Resources*, on pages 4.5-3 through 4.5-4 of the Final Supplemental EIR.

V. FINDINGS FOR IMPACTS IDENTIFIED AS SIGNIFICANT AND UNAVOIDABLE

SRTA hereby finds that mitigation measures that have been identified in the Supplemental EIR that will lessen the following significant environmental impacts but not to a less than significant level. These findings are based on the discussion of impacts in the detailed issue area analyses in the Initial Study prepared for the 2018 RTP/SCS, Section 4.0 of the Supplemental EIR, and relevant responses to comments in the Final Supplemental EIR.

The findings below are for impacts, where implementation of the Project may result in the following significant, unavoidable environmental impacts:

A. Agriculture and Forestry Resources

- 1. Impacts.** Implementation of proposed transportation improvements and the land use scenario envisioned by the 2018 RTP/SCS could result in the conversion of agricultural lands including Prime Farmland and lands under Williamson Act contract to non-agricultural uses. This is considered a significant and unavoidable impact.

 - a. Mitigation** – SRTA recommends that individual project lead agencies implement the following mitigation measures for applicable transportation projects that may result in impacts to agricultural lands. Project-specific environmental impacts conducted by a lead agency for an applicable transportation project may require these mitigation measures be revised or expanded in response to site-specific conditions:

LU-5(a) When new roadway extensions or widenings are planned, the individual project lead agency should assure that project-specific environmental reviews consider alternative alignments that reduce or avoid impacts to Prime Farmlands.

LU-5(b) Rural roadway alignments shall follow property lines to the extent feasible, to minimize impacts to the agricultural production value of any specific property. Farmers should be compensated for the loss of agricultural production at the margins of lost property, based on the amount of land deeded as road right-of-way, as a function of the total amount of production on the property.

LU-5(c) Individual project lead agencies should consider corridor realignment, buffer zones, setbacks, and fencing to reduce conflict between agricultural lands and neighboring uses.

LU-5(d) Quantify the potential for direct conversion of Important Farmland using the Land Evaluation and Site Assessment (LESA) model or a similar quantitative tool.

LU-5(e) Compensate for conversion impacts to Prime Farmland by purchasing agricultural conservation easements (ACE) or funding the acquisition of agricultural mitigation lands through an appropriate land trust.

LU-5(f) Individual project lead agencies should conduct an analysis of potential conflicts with Williamson Act contracts at the project level, consistent with the State CEQA Guidelines. If the impacts of the proposed roadway projects on Williamson Act contract lands are determined to be significant, implement the following measures to reduce the impacts to a less-than-significant level:

- a. Design the proposed roadway projects to avoid or minimize the displacement of current and reasonably foreseeable agricultural operations from affected Williamson Act contract lands.
 - b. Where it has been determined that cancellation of a Williamson Act contract for a parcel, or a portion of a parcel, may result in impacts to Prime or Important Farmland, Mitigation Measure LU-5(a) shall be implemented.
- b. Findings** – Although the above measures would reduce impacts to Prime Farmland and lands under Williamson contract to the degree feasible, such impacts cannot be fully mitigated due to the potential conversion to non-agricultural use. Impacts from individual projects will need to be addressed on a case-by-case basis; however, because impacts to individual Prime Farmland and lands under Williamson contract cannot be assumed to be less than significant, agricultural impacts are considered significant and unavoidable.
- c. Supportive Evidence** – Please refer to pages 4 through 6 of the Initial Study included in the Supplemental EIR as Appendix A.

B. Air Quality

- 1. Impact AQ-4.** Re-entrained dust from transportation sources has the potential to increase airborne particulate matter levels in Shasta County. The 2018 RTP/SCS would increase VMT and vehicle speeds in Shasta County relative to both baseline and 2040 No Project conditions, which would contribute to greater levels of re-entrained dust from roadway activity. This impact would be significant and unavoidable.
 - a. Mitigation** – The 2018 RTP/SCS includes policies, alternative transportation projects, and transportation demand management projects that would encourage the use of transportation modes other than passenger vehicles. The 2018 RTP/SCS would also incorporate Mitigation Measure AQ-1, which would reduce re-entrained dust generated by off-road construction activities. Nonetheless, implementation of the 2018 RTP/SCS would result in greater total VMT and higher vehicle speeds when compared to baseline or 2040 conditions without the 2018 RTP/SCS. There are no feasible mitigation measures to substantially reduce re-entrained dust from on-road vehicle activity, and, as discussed in Section 4.4, *Transportation and Circulation*, there are no feasible mitigation measures to reduce VMT.
 - b. Findings** – This impact would remain significant and unavoidable. No additional mitigation measures to reduce this impact to less-than-significant levels are feasible.
 - c. Supportive Evidence** - Please refer to Section 4.1, *Air Quality*, on pages 4.1-14 through 4.1-15 of the Final Supplemental EIR.

C. Biological Resources

1. **Impacts.** Implementation of transportation improvements proposed, and the land use scenario envisioned by the 2018 RTP/SCS may interfere with the movement of a native resident or migratory fish or wildlife species or with an established native resident or migratory wildlife corridors. This impact would be significant and unavoidable.
 - a. **Mitigation** – SRTA recommends that individual project lead agencies implement the following mitigation measures for applicable transportation projects, including but not limited to those projects identified under the 2018 RTP/SCS. These measures can and should be implemented for future land development pursuant to the 2018 RTP/SCS that would result in impacts to wildlife movement or migratory wildlife corridors.

B-3(a) All projects including long segments of fencing and lighting shall be designed to minimize impacts to wildlife. Fencing shall not block wildlife movement through riparian or other natural habitat. Where fencing is required for public safety concerns, the fence shall be designed in consultation with CDFW and to permit wildlife movement by incorporating design features such as:

- A minimum of 16 inches between the ground and the bottom of the fence to provide clearance for small animals;
- A minimum 12 inches between the top two wires, or top the fence with a wooden rail, mesh, or chain link instead of wire to prevent animals from becoming entangled; and
- If privacy fencing is required near open space areas, openings at the bottom of the fence measure at least 16 inches in diameter shall be installed at reasonable intervals to allow wildlife movement

If fencing must be designed in such a manner that wildlife passage would not be permitted, wildlife crossing structures shall be incorporated into the project design as appropriate and in consultation with CDFW.

Similarly, lighting installed as part of any project shall be designed to be minimally disruptive to wildlife. This may be accomplished through the use of hoods to direct light away from natural habitat, using low-intensity lighting, and using as few lights as necessary to achieve the goals of the project. Lighting for trails and bridges that would overspill onto rivers and/or streams that are known to support anadromous fish shall be approved by CDFW.

B-3(b) The following construction Best Management Practices (BMPs) shall be incorporated into all grading and construction plans:

- Designation of a 20 mile-per-hour speed limit in all construction areas.
- All vehicles and equipment shall be parked on the pavement, existing roads, and previously disturbed areas, and clearing of vegetation for vehicle access shall be avoided to the greatest extent feasible.
- The number of access routes, number, and size of staging areas, and the total area of the activity shall be limited to the minimum necessary to achieve the goal of the project.
- Designation of equipment washout and fueling areas to be located within the limits of grading at a minimum of 100 feet from waters, wetlands, or other sensitive resources as identified by a qualified biologist. Washout areas shall be designed to fully contain polluted water and materials for subsequent removal from the site.

- Daily construction work schedules should be limited to daylight hours only, to the extent feasible.
 - Mufflers shall be used on all construction equipment and vehicles shall be in good operating condition.
 - Drip pans shall be placed under all stationary vehicles and mechanical equipment.
 - All trash shall be placed in sealed containers and shall be removed from the project site a minimum of once per week.
 - No pets are permitted on the project site during construction.
- b. Findings** – With the implementation of the above mitigation measures, the potential for the Project to impede wildlife movement, including fish migration, would be reduced. These measures would require project fencing that is conducive to wildlife passage and lighting that minimize intrusion on wildlife behaviour and habitat. These measures also require habitat disturbance to be minimized and anthropogenic disturbances to wildlife, such as construction noise and pets, to be avoided. However, it is not possible to prevent disruption to wildlife movement completely, despite implementation of mitigation. Thus, this impact would remain significant and unavoidable. No additional mitigation measures to reduce this impact to less-than-significant levels are feasible.
- c. Supportive Evidence** – Please refer to pages 18 through 19 of the Initial Study included in the Supplemental EIR as Appendix A.

D. Cultural Resources

- 1. Impacts.** Implementation of proposed 2018 RTP/SCS could disturb known and unknown cultural resources, including historical, archaeological, and paleontological resources. Impacts to archaeological and paleontological resources would be reduced to less than significant with mitigation but impacts to historical resources would be significant and unavoidable.

- a. Mitigation** – In order to provide protection of cultural resources, SRTA recommends that individual project lead agencies implement the following mitigation measures for applicable transportation projects, including but not limited to those projects identified under the 2018 RTP/SCS:

CR-1(a) The project lead agency of a 2018 RTP/SCS project involving earth disturbance, the installation of pole signage or lighting, or construction of permanent above-ground structures or roadways shall ensure that the following elements are included in the project's individual environmental review:

1. Prior to construction, a map defining the Area of Potential Effects (APE) shall be prepared on a project by project basis for 2018 RTP/SCS improvements which involve earth disturbance, the installation of pole signage or lighting, or construction of permanent above ground structures. This map will indicate the areas of primary and secondary disturbance associated with construction and operation of the facility and will help in determining whether known archaeological, paleontological or historical resources are located within the impact zone.
2. A preliminary study of each project area, as defined in the APE, shall be completed to determine whether or not the project area has been studied under an earlier investigation, and to determine the impacts of the previous project.

3. If the results of the preliminary studies indicate additional studies are necessary; development of field studies and/or other documentary research shall be developed and completed (Phase I studies). Negative results would result in no additional studies for the project area.

4. Based on the positive results of the Phase I studies, an evaluation of identified resources shall be completed to determine the potential eligibility/ significance of the resources (Phase II studies).

5. Based on the evaluations of the Phase II studies, if necessary Phase II mitigation studies shall be coordinated with the Office of Historic Preservation, as the research design will require review and approval from the OHP. In the case of prehistoric or Native American related resources, the Native American Heritage Commission and/or local representatives of the Native American population shall be contacted and permitted to respond to the testing/mitigation programs.

CR-1(b) If development of the proposed improvement requires the presence of an archaeological, Native American, or paleontological monitor, the individual project lead agency shall ensure that a Native American monitor, certified archaeologist, and/or certified paleontologist, as applicable, monitor the grading and/or other initial ground altering activities. The schedule and extent of the monitoring will depend on the grading schedule and/or extent of the ground alterations. This requirement can be accomplished through placement of conditions on the project by the local jurisdiction during the individual environmental review.

CR-1(c) The individual project lead agency shall ensure that materials recovered over the course of any given improvement are adequately cleaned, labeled, and curated at a recognized repository. This requirement can be accomplished through placement of conditions on the project by the local jurisdiction during the individual environmental review.

CR-1(d) The individual project lead agency shall ensure that mitigation for potential impacts to significant cultural resources includes one or more of the following:

- Realign the project right-of-way (avoidance; the most preferable method).

- Cap the site and leave it undisturbed.

- Address structural remains with respect to NRHP guidelines (Phase III studies).

- Relocate structures per NRHP guidelines.

- Create interpretative facilities at the site.

- Develop measures to prevent vandalism.

These measures can be accomplished through placement of conditions on the project by the local jurisdiction during the individual environmental review.

- b. Findings** – Implementation of the above measures would reduce potential impacts to archaeological and paleontological resources to a less than significant level. Implementation of the above measures would reduce potential impacts to historic structures. However, because redevelopment or demolition that may be required to implement transportation improvements may result in the permanent loss of historic structures, impacts would be significant and unavoidable. No additional mitigation measures to reduce this impact to historical resources to less-than-significant levels are feasible.

- c. **Supportive Evidence** – Please refer to page 20 to 22 of the Initial Study included in the Supplemental EIR as Appendix A.

E. Hazards and Hazardous Materials

1. **Impact HAZ-1.** The 2018 RTP/SCS includes land development and transportation projects within areas of moderate, high, and very high fire hazard severity zones. Infill development emphasized in the 2018 RTP/SCS and existing regulations and programs would reduce the vulnerability of people and structures to wildland fires. However, a significant risk of loss, injury, or death from wildland fires would be possible given the fire hazard across Shasta County. Impacts would be significant and unavoidable.
- a. **Mitigation** – SRTA shall implement the following mitigation measure developed for the 2018 RTP/SCS where applicable for transportation projects that result in impacts related to wildland fire. Cities and counties in the SRTA region can and should implement these measures, where relevant to land use projects implementing the 2018 RTP/SCS. Project-specific environmental documents may adjust these mitigation measures as necessary to respond to site-specific conditions.

HAZ-1 Wildland Fire Risk Reduction. If an individual transportation or land use project included in the 2018 RTP/SCS is located within the wildland-urban interface or areas favorable for wildland fires such that project-specific CEQA analysis finds a significant risk of loss, injury or death from fire, the implementing agency shall require appropriate mitigation to reduce the risk. Examples of mitigation to reduce the risk of loss, injury or death from wildlife include, but are not limited to:

- Require adherence to the local hazards mitigation plan, as well as the local general plan policies and programs aimed at reducing the risk of wildland fires through land use compatibility, training, sustainable development, brush management, public outreach and service standards for fire departments.
 - Encourage the use of fire-resistant vegetation native to the SRTA region and/or the local microclimate of the project site and discourage the use of fire-prone species especially non-native, invasive species such as pampas grass or giant reed.
 - Require a fire safety plan be submitted to and approved by the local fire protection agency. The fire safety plan shall include all of the fire safety features incorporated into the project and the schedule for implementation of the features. The local fire protection agency may require changes to the plan or may reject the plan if it does not adequately address fire hazards associated with the project as a whole or the individual phase of the project.
 - Prohibit certain project construction activities with the potential to ignite wildland fires during red-flag warnings issued by the National Weather Service for the project site location. Example activities that should be prohibited during red-flag warnings include welding and grinding outside of enclosed buildings.
 - Require fire extinguishers to be onsite during construction of projects. Fire extinguishers shall be maintained to function according to manufacturer specifications. Construction personnel shall receive training on the proper methods of using a fire extinguisher.
- b. **Findings** – With the implementation of this mitigation, the risk of loss of structures and transportation infrastructure and the risk of injury or death due to wildland fire would be

reduced. These measures would make structures more fire resistant and less vulnerable to lose in the event of a wildland fire. These measures would also reduce the potential for construction of the 2018 RTP/SCS projects to inadvertently ignite a wildland fire. However, it is not possible to prevent a significant risk of wildland fires or fully protect people and structures from the risks of wildland fires, despite the implementation of mitigation. Thus, this impact would remain significant and unavoidable. No additional mitigation measures to reduce this impact to less-than-significant levels are feasible.

- c. **Supportive Evidence** - Please refer to Section 4.3, *Hazards and Hazardous Materials*, on pages 4.3-6 through 4.3-8 of the Final Supplemental EIR.

F. Transportation and Circulation

1. **Impact T-1.** VMT, which is the metric used to evaluate the performance of the circulation system, would increase under implementation of the 2018 RTP/SCS compared to conditions in 2040 without its implementation. Therefore, the 2018 RTP/SCS could conflict with applicable plans, policies, and congestion management programs. Impacts would be significant and unavoidable.
 - a. **Mitigation** – The 2018 RTP/SCS includes policies, alternative transportation projects, and transportation demand management projects that would encourage the use of transportation modes other than passenger vehicles. Nonetheless, implementation of the 2018 RTP/SCS would result in greater total VMT when compared to 2040 conditions without the 2018 RTP/SCS. No feasible additional mitigation measures have been identified that would further reduce total VMT. Refer to Section 6, *Alternatives* of the Supplemental EIR for a discussion of 2018 RTP/SCS alternatives that examine land use and transportation scenarios that incorporate different assumptions regarding the combinations of future land uses and transportation system improvements.
 - b. **Findings** – This impact would remain significant and unavoidable. No additional mitigation measures to reduce this impact to less-than-significant levels are feasible.
 - c. **Supportive Evidence** - Please refer to Section 4.4, *Transportation and Circulation*, on pages 4.4-10 through 4.4-11 of the Final Supplemental EIR.

VI. FINDINGS ON CUMULATIVE IMPACTS

A. Introduction

This Supplemental EIR is a Program EIR that analyzes the effects of the cumulative buildout of the 2018 RTP/SCS. The proposed 2018 RTP/SCS considers probable future projects included in the range of transportation projects designed to meet the plan goals and current and projected future needs, and the Final Supplemental EIR analyzes the cumulative impacts of these projects in Chapter 4 and in the Initial Study, which is included as Appendix A to the Supplemental EIR. The cumulative effects of all probable future circulation system improvements are included in the analysis of the proposed Project's impacts. In the Initial Study and in Chapter 4.0 of the Supplement EIR, thresholds of significance for cumulative impacts are the same as those for direct, specific impacts of the 2018 RTP/SCS, as authorized by CEQA case law. (*See Save Cuyama Valley v. County of Santa Barbara* (2013) 213 Cal.App.4th 1059.) When specific impacts of the 2018 RTP/SCS are judged to be significant, they also by definition are considered "cumulatively considerable" incremental contributions to significant cumulative impacts. (See CEQA Guidelines Section 15130(a).) Mitigation measures adopted for specific 2018 RTP/SCS impacts in Sections

IV and V of these findings also are feasible options for mitigating the proposed Project's incremental contribution to significant cumulative effects. (See CEQA Guidelines Section 15130(b)(5).)

B. Findings for Significant Cumulative Impacts for Which Project's Incremental Contribution has Not Been Mitigated to Less than Significant Levels

For the following impacts, SRTA hereby finds that in Section V of these findings, mitigation measures have been identified in the Supplemental EIR that will reduce the proposed Project's incremental contribution to the following significant cumulative impacts, but not to a less than significant (i.e., less than cumulatively considerable) level. The significant impacts and the mitigation are as follows:

- Agriculture; the Project would have cumulatively significant impacts on agricultural uses and farmland; no feasible mitigation to reduce the impact.
- Biological Resources; Mitigation Measures B-3(a) and B-3(b).
- Cultural Resources (for historic structures); Mitigations Measures CR-1(a)-(d).
- Impact AQ-4; No feasible mitigation to reduce the impact.
- Impact HAZ-1; Mitigation Measure HAZ-1.
- Impact T-1; No feasible mitigation to reduce the impact.

VII. FINDINGS REGARDING ALTERNATIVES

A. Legal Requirements for Alternatives

Public Resources Code § 21002 provides that "public agencies should not approve projects as proposed if there are feasible alternatives...which would substantially lessen the significant environmental effects of such projects." "Feasible" means "capable of being accomplished in a reasonable period of time taking into account economic, environmental, legal, social, and technological factors" (CEQA Guidelines § 15364). The concept of feasibility also encompasses whether a particular alternative promotes the Project's underlying goals and objectives and whether an alternative is impractical or undesirable from a policy standpoint. (See *City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 410; *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957.).

The issue of alternatives feasibility arises twice in the CEQA process, once when the EIR is prepared, and again when CEQA findings are adopted. When assessing feasibility in an EIR, the EIR preparer evaluates whether an alternative is "potentially" feasible. Potentially feasible alternatives are suggestions by the EIR preparers which may or may not be adopted by lead agency decisionmakers. When CEQA findings are made after EIR certification, the lead agency decisionmaking body independently evaluates whether the alternatives are actually feasible, including whether an alternative is impractical or undesirable from a policy standpoint. (See *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957.) If a significant impact can be substantially lessened (i.e., mitigated to a less than significant level) by the adoption of mitigation measures, lead agency findings need not consider the feasibility of alternatives to reduce that impact. (See *Laurel Hills Homeowners Association v. City Council* (1978) 83 Cal.App.3d 515.) Nevertheless, Section 6, *Alternatives*, of the Supplemental EIR and these Findings of Fact do consider the ability of potentially feasible alternatives to substantially reduce all of the Project's significant impacts, even those impacts reduced to less-than-significant levels through the adoption of mitigation measures.

An EIR must only evaluate reasonable alternatives to a project that could feasibly attain most of the project objectives and evaluate the comparative merits of the alternatives (CEQA Guidelines § 15126.6(a)). In all cases, the consideration of alternatives is to be judged against a rule of reason. The lead agency is not required to choose the environmentally superior alternative identified in the EIR if the alternative does not provide substantial advantages over the proposed project; and (1) through the imposition of mitigation measures the environmental effects of a project can be reduced to an acceptable level, or (2) there are social, economic, technological, or other considerations that make the alternative infeasible. (Pub. Res. Code §§21002, 21002.1; CEQA Guidelines §15092.)

The proposed 2018 RTP/SCS alternatives were selected for review in the Supplemental EIR because of their potential to avoid or substantially lessen project impacts, or because they were required under CEQA Guidelines (e.g., the No Project alternative). Three alternatives are considered for the proposed 2018 RTP/SCS: Alternative 1: No Project Alternative; Alternative 2: No Project 2015 RTP/SCS Alternative; and Alternative 3: Increased Infill Alternative. These alternatives are briefly described below, and each alternative is described in more detail in the 2018 RTP/SCS Final Supplemental EIR and appendices thereto.

Alternative 1 includes a land use pattern comprised of existing land use trends dictated by the current land use plans of the applicable jurisdictions within the region, such as the Shasta County General Plan and City of Redding General Plan. Under Alternative 1 the transportation network would be comprised of committed transportation projects included in the SRTA Regional Transportation Improvement Program and the Federal Transportation Improvement Program. Alternative 2 represents the continued implementation of the current 2015 RTP/SCS simply updated to reflect current conditions and forecasts. Transportation improvements included under Alternative 2 would be similar to the 2018 RTP/SCS. However, the 35 net new projects that would be added to the transportation project list under the 2018 RTP/SCS would not be added to the list or constructed under Alternative 2. Alternative 3 provides for more compact development, more infill development, and less city expansion compared to the proposed 2018 RTP/SCS. With regard to the transportation network, Alternative 3 would prioritize investments on transit and active transportation, such as bicycle facilities, sidewalks, traffic calming measures, and intersection safety improvements. Alternative 3 was as determined to be environmentally superior to the proposed 2018 RTP/SCS. However, all of the alternatives are rejected for the reasons stated below in Section VII.B.

B. Findings on Alternatives

1. No Project Alternative (Alternative 1)

- a. Description** – The No Project Alternative includes a land use pattern comprised of existing land use trends dictated by the current land use plans of the applicable jurisdictions within the region. It assumes that current regional growth trends would continue, but it updates the total growth to be consistent with the updated Regional Growth Forecast, as population growth in the region would occur regardless of the 2018 RTP/SCS. Rather than focusing on coordinating transportation projects that serve infill and transit-oriented development, the transportation network would be comprised of committed transportation projects included in SRTA’s Regional Transportation Improvement Program and the Federal Transportation Improvement Program. Please refer to page 6-2 of the Final Supplemental EIR.
- b. Findings** – The No Project Alternative would result in a less dense development pattern compared to the 2018 RTP/SCS, with a continuation of existing land use trends. Because of the increased land development outside of existing urbanized areas, Alternative 1 would result in more ground disturbance than the 2018 RTP/SCS. Consequently, compared to the 2018 RTP/SCS, the potentially significant impacts of the 2018 RTP/SCS would be even greater under Alternative 1. This alternative would also result in higher GHG emissions compared to the 2018 RTP/SCS. As shown in Table 6-1 of the Final Supplemental EIR, the total overall impact of

Alternative 1 would be greater than the 2018 RTP/SCS. Please refer to pages 6-2 through 6-5 of the Final Supplemental EIR.

Alternative 1 would implement committed transportation projects in the Regional Transportation Improvement Program and Federal Transportation Improvement Program but would not include other transportation infrastructure projects identified in the 2018 RTP/SCS. This alternative would not meet the SB 375 requirement for preparation of an SCS, or other applicable regulations pertaining to RTPs. Therefore, this alternative would not meet the basic objectives of the 2018 RTP/SCS. Please refer to page 6-12 of the Final Supplemental EIR.

2. No Project 2015 RTP/SCS Alternative (Alternative 2)

- a. Description** – The No Project 2015 RTP/SCS Alternative represents the continued implementation of the current 2015 RTP/SCS, updated to reflect current conditions and forecasts. Because this alternative updates the 2015 RTP/SCS with current conditions and forecasts, the land use scenario under this alternative would be similar to the land use scenario envisioned by the 2018 RTP/SCS. Briefly, this land use scenario concentrates the forecasted growth in population and employment in the region in urban areas and corridors of the County while preserving the distinct identity of existing cities and towns. Transportation improvements included under this alternative also would be similar to the 2018 RTP/SCS. However, the 35 net new projects that would be added to the transportation project list under the 2018 RTP/SCS would not be added to the list or constructed under this alternative. Please refer to page 6-5 of the Final Supplemental EIR.
- b. Findings** – The No Project 2015 RTP/SCS Alternative would result in slightly less impacts on biological resources (i.e., wildlife movement) and tribal cultural resources as compared to the 2018 RTP/SCS. This is because Alternative 2 would result in the construction of 35 fewer transportation projects than the 2018 RTP/SCS. Impacts of Alternative 2 would be similar to the 2018 RTP/SCS for the other issues and impacts studied, with the exception of GHG emissions. The GHG emissions under Alternative 2 would be slightly higher than GHG emissions under the 2018 RTP/SCS. Please refer to pages 6-5 through 6-8 of the Final Supplemental EIR.

SRTA is required to update its RTP every four years pursuant to federal regulations (23 C.F.R. §450.322(c) and State regulations (Gov. Code §65080(d)). The 2015 RTP/SCS was adopted in June 2015. Therefore, continued implementation of the 2015 RTP/SCS beyond 2019 would not comply with federal or State laws. The primary objective of the 2018 RTP/SCS is to comply with applicable regulatory requirements. Because Alternative 3 would not comply with regulatory requirements, it would not achieve the primary objective of the project. It may also not be a feasible alternative due to inconsistencies with federal and State regulatory requirements requiring period updates of RTPs. Please refer to page 6-12 of the Final Supplemental EIR.

3. Increased Infill Alternative (Alternative 3)

- a. Description** – The Increased Infill Alternative provides for more compact development, more infill development, and less city expansion than the proposed 2018 RTP/SCS. Alternative 3 would result in higher average residential density, a greater percentage of multi-family housing, and a greater percentage of housing within and near downtown areas and job centers relative to the proposed 2018 RTP/SCS. The transportation network in this alternative includes additional transit investments in alternative modes intended to serve shorter, local trips given the more concentrated growth pattern. Specifically, active transportation investments such as bicycle facilities, sidewalks, traffic calming measures, and intersection safety improvements would be prioritized. Under Alternative 3, the investment would be

focused on closing transit gaps by enhancing local transit bus service rather than interregional or long-distance services. In addition, active transportation projects such as bicycle facilities, trails and pedestrian improvements would be programmed throughout the region under Alternative 3. Please refer to page 6-8 of the Final Supplemental EIR.

- b. Findings** – The Increased Infill Alternative is the environmentally superior alternative, assuming all environmental issue areas are weighted equally. Under Alternative 3, land use patterns would further concentrate forecasted population and employment growth in urban areas with a focus on infill in and around commercial corridors. Alternative 3 could be considered environmentally superior to the 2018 RTP/SCS primarily because it would result in less overall impacts to each issue area that the 2018 RTP/SCS would have potentially significant impacts, with the exception of air quality and cultural resources. Air quality impacts would be similar to the 2018 RTP/SCS, but this alternative would result in less re-entrained dust and criteria pollutant emissions. Potentially significant cultural resource impacts are associated with historical resources, which are typically located in urbanized areas. Please refer to pages 6-8 through 6-10 of the Final Supplemental EIR.

Because Alternative 3 would include regionally identified transportation projects and an SCS component that would further concentrate development in urban areas, it would continue to meet the objectives of the 2018 RTP/SCS, including: complying with applicable regulatory requirements; serving regional goals, objectives, policies and plans; and responding to community and regional transportation needs. In addition, because Alternative 3 would increase investments in alternative and active transportation modes, it would promote energy efficient, environmentally sound modes of travel to a greater extent than the 2018 RTP/SCS. However, Alternative 3 may not be feasible in that SRTA does not have land use authority and cannot require local agencies to change their land use designations that are required for Alternative 3 to be considered environmentally superior. Also, the proposed land use changes required to implement Alternative 3 may not be acceptable to the local jurisdictions as to their development goals and objectives. Please refer to pages 6-11 through 6-12 of the Final Supplemental EIR.

VIII. STATEMENT OF OVERRIDING CONSIDERATIONS

SRTA adopts and makes this Statement of Overriding Considerations concerning the unavoidable significant impacts of the 2018 RTP/SCS (Project) to explain why the Project's benefits override and outweigh its unavoidable impacts.

The Final Supplemental Environmental Impact Report (EIR) has identified and discussed significant effects that may occur as a result of the Project. As set forth in these CEQA Findings, SRTA has made a reasonable and good faith effort to eliminate or substantially mitigate the impacts resulting from the Project and has made specific findings on each of the project's significant impacts and on mitigation measures and alternatives. With the implementation of the mitigation measures discussed in the Supplemental EIR, most of the Project's effects can be mitigated to a level of less than significant. However, even with the implementation of all feasible mitigation, the Project will result in significant and unavoidable impacts as follows:

1. Implementation of the 2018 RTP/SCS could result in the conversion of agricultural lands including Prime Farmland and lands under Williamson Act contract to non-agricultural uses. (Impact discussion provided Agricultural Resources section in the Initial Study, which is Appendix A of the Supplemental EIR)
2. Implementation of the 2018 RTP/SCS could to greater levels of re-entrained dust from additional VMT and roadway activity. (Impact AQ-4)

3. Implementation of the 2018 RTP/SCS could impede wildlife movement, including fish migration (Impact discussion provided in the Biological Resources section of the Initial Study, which is Appendix A of the Supplemental EIR)
4. Implementation of the 2018 RTP/SCS could require demolition or otherwise impact historical structures (Impact discussion provided in the Cultural Resources section of the Initial Study, which is Appendix A of the Supplemental EIR)
3. Implementation of the 2018 RTP/SCS could result in a significant risk of loss, injury or death from wildland fires given the fire hazard across Shasta County. (Impact HAZ-1)
4. Implementation of the 2018 RTP/SCS could conflict with applicable plans, policies, and congestion management programs that would affect the performance of the circulation system. (Impact T-1)

In accordance with Section 15093 of the CEQA Guidelines, and having reduced the adverse significant environmental effects of the Project to the extent feasible, having considered the entire administrative record on the Project, and having weighed the benefits of the Project against its unavoidable adverse impacts after mitigation, SRTA hereby finds that the following legal, economic, social, and environmental benefits of the Project outweigh its unavoidable adverse impacts and render them acceptable based upon the following considerations. Each benefit set forth below constitutes an overriding consideration warranting approval of the Project, independent of the other benefits, despite each and every unavoidable impact.

- a. The implementation of 2018 RTP/SCS transportation projects will provide for a comprehensive transportation system of facilities and services that meets the public's need for the movement of people and goods, and that is consistent with the social, economic, and environmental goals and policies of the region.
- b. The Project will improve transportation mobility and accessibility in the County.
- c. The Project will improve air quality by reducing emissions of ozone precursors compared to future No Project conditions.
- d. The Project will contribute to a reduction in greenhouse gas (GHG) emissions from passenger vehicles and light trucks, helping the Shasta County area to achieve the regional GHG reduction targets set by the California Air Resources Board (CARB).
- e. The Project will promote consistency between the California Transportation Plan 2025, the regional transportation plan and other plans developed by cities, counties, districts, Native American Tribal Governments, and State and Federal agencies in responding to Statewide and interregional transportation issues and needs.
- f. The construction of transportation projects included in the 2018 RTP/SCS will result in both short-term and long-term economic benefits to the Shasta County area and its residents. Transportation projects will indirectly provide for a number of jobs relating to construction and maintenance. The RTP program includes \$2.18 billion of transportation investments in the SRTA region. Other California MPO studies have shown that investments in regional transportation projects and programs provide numerous jobs locally.

IX. MITIGATION MONITORING AND REPORTING PROGRAM

SRTA finds that a Mitigation Monitoring and Reporting Program (MMRP) has been prepared for the 2018 RTP/SCS and has been adopted concurrently with these Findings (Public Resources Code, § 21081.6(a)(1)). The MMRP is described in the following sections.

The California Environmental Quality Act (CEQA) requires that an agency adopt a Mitigation Monitoring or Reporting Program (MMRP) prior to approving a project that includes mitigation measures. This MMRP has been prepared in compliance with the requirements of Section 21081.6 of the California Public Resources Code and Sections 15091(d) and 15097 of the CEQA Guidelines.

The purpose of this MMRP is to ensure the adopted mitigation measures adopted in the Findings of Fact for the 2018 RTP/SCS are implemented, in accordance with CEQA requirements. The Findings of Fact adopt feasible mitigation measures to reduce the significant environmental impacts of the 2018 RTP/SCS. The mitigation measures adopted in the 2018 RTP/SCS Supplement EIR Findings are listed in Sections IV and V of these Findings of Fact.