
**FINDINGS FOR THE
AMADOR COUNTY
REGIONAL TRANSPORTATION PLAN UPDATE
REQUIRED UNDER THE CALIFORNIA ENVIRONMENTAL QUALITY ACT
(Public Resources Code, Section 21000 et seq)**

I. INTRODUCTION

The California Environmental Quality Act (CEQA) (Pub. Resources Code, § 21000 et seq.) requires the Amador County Transportation Commission (ACTC), as the CEQA lead agency, to: 1) make written findings when it approves a project for which an environmental impact report (EIR) was certified, and 2) identify overriding considerations for significant and unavoidable impacts identified in the EIR.

This document explains the ACTC's findings regarding the significant and potentially significant impacts identified in the environmental impact report (EIR) prepared for the 2015 Amador County Regional Transportation Plan (RTP or Project). The statement of overriding considerations in section VII, below, identifies economic, social, technical, and other benefits of the Project that override any significant environmental impacts that would result from the Project.

As required under CEQA, the Final EIR describes the Project, adverse environmental impacts of the project, and mitigation measures and alternatives that would substantially reduce or avoid those impacts. The information and conclusions contained in the EIR reflect the ACTC's independent judgment.

The Final EIR (which includes the Draft EIR, comments, responses to comments, and revisions to the Draft EIR) for the Project, examined the Proposed Project and several alternatives to the Project including: (1) No Project Alternative; (2) Expand Existing Highways; (3) Emphasize Local Road Rehabilitation and Maintenance; and (4) Implement Multi-Modal Circulation Improvement Program – Financially Unconstrained.

The Findings and Statement of Overriding Considerations are presented for adoption by the ACTC Board, as the ACTC's findings under CEQA and the CEQA Guidelines (Cal. Code Regs., title 14, § 15000 et seq.) relating to the Project. The Findings provide the written analysis and conclusions of this Board regarding the Project's environmental impacts, mitigation measures, alternatives to the Project, and the overriding considerations, which in this Board's view, justify approval of the Project, despite its environmental effects.

II. GENERAL FINDINGS AND OVERVIEW

Background

State law requires that the RTP be updated and submitted to the California Transportation Commission (CTC) every five years. The purpose of the RTP is to identify the Region's short-term and long-range transportation needs and to establish policies, programs, and projects designed to meet those needs. Transportation improvement projects that are included in the RTP and are prioritized for funding through the Regional Transportation Improvement Program (RTIP) are then submitted to the CTC for programming every two years as part of the State Transportation Improvement Program (STIP). Projects that are proposed for funding through other sources, such as state or federal competitive grant programs are submitted according to the requirements of individual programs. In either case, improvement projects proposed for funding must typically be identified through either a local or regional transportation planning process, such as the RTP.

The RTP needs to be updated in order to demonstrate the progress made toward implementing the 2004 RTP, to reflect any changing conditions, and to determine if changes are warranted to the ACTC's policies, programs, and projects for the next 20 years. Lastly, the 2004 RTP needs to be updated to maintain compliance with the CTC's 2010 Regional Transportation Plan Guidelines

Project Overview

The proposed project is the adoption and implementation of the 2015 Amador County Regional Transportation Plan (RTP). The RTP has been prepared to fulfill the state requirements of AB 402 (Government Code Title 7, Chapter 2.5, Sections 65080-65082) using specific guidance from the California Transportation Commission Regional Transportation Plan Guidelines. More specifically, the RTP is a twenty year, comprehensive transportation plan for all modes of transportation. ACTC is required to adopt and submit an updated RTP to the California Transportation Commission (CTC) and the Department of Transportation (Caltrans) every five years. In addition, the RTP is used to documents ACTC's priorities for transportation funding in the region.

The secondary purpose of the RTP is to serve as a foundation for the development of the shorter "action" plans called the Regional Transportation Improvement Program (RTIP), which satisfies California transportation planning requirements, and the federal counterpart referred to as the Federal Transportation Improvement Program (FTIP) for all transportation projects that contain federal transportation dollars or require federal approval.

The RTP contains three primary elements: Policy Element, Action Element, and Financial Element.

The **Policy Element** presents guidance to decision-makers of the implications, impacts, opportunities, and foreclosed options that will result from implementation of the RTP. California law (Government Code Section 65080 (b)) states that each RTP shall include a Policy Element that:

1. Describes the transportation issues in the region;
2. Identifies regional needs expressed within both short and long range planning horizons; and,

3. Maintains internal consistency with the Financial Element and fund estimates.

The **Action Element** identifies programs and actions to implement the RTP in accordance with the goals, objectives, and policies set forth in the Policy Element. It includes regionally significant multimodal projects that currently have funding in place or that are projected to have funding in the future (Fiscally Constrained), while it also identifies other improvement projects that are needed but do not have funding (Fiscally Unconstrained).

The **Financial Element** identifies the current and anticipated revenue sources and financing techniques available to fund the fiscally constrained transportation investments described in the Action Element. It also identifies potential funding shortfalls and sources for the unconstrained project list.

POLICY ELEMENT

The main transportation issues in western Amador County are related to providing infrastructure and services to meet the demands of a growing, and aging, population, while maintaining and enhancing the rural character and environmental qualities of the area. In eastern Amador County, the issues also stem from the challenges to meet to the demands of a growing and aging population, as well as, the high volumes of traffic generated by travelers taking advantage of the recreational opportunities available in the South Lake Tahoe and broader Sierra Nevada mountain range area. To address these issues requires a multi-modal approach to transportation planning in the region.

Acquiring adequate and timely funding for transportation improvements is the central need within all of the Amador County issues. As the population grows implementation of highway and regional roadway improvements will be key to reducing congestion while improving safety and air quality. The 2010 Census reported that approximately 20.6% of the county population was over 65 years of age and it is projected that by 2030 this proportion is expected to increase to over 30%. As the population of residents over the age of 65 increases, it will result in increased demand for public transit services in Amador County. Additional state and federal transit operating and capital revenues will be necessary in order to meet the additional demand placed on the public transit systems.

Recognition of these issues leads to the overall goal (“Desired Outcomes”) of the Regional Transportation Plan which is to reduce traffic congestion and improve human mobility, enhance safety, optimize community connectivity, support positive socioeconomic growth and a sustainable, encourage a broad-based economy, preserve and enhance community character and the environment, ensure the implementation of a feasible funding plan, and preserve the existing transportation system. These overall goals are reflected in the specific policy categories that are outlined in the Policy Element:

- Multi-modal System
- Regional Roadways
- Local Streets and Roads

- Transit
- Aviation
- Pedestrian/Bicycle
- Goods Movement; Rail/Trucking
- Alternative Strategies
- Air Quality
- Transportation Funding

The Policy Element identifies policies, objectives, and performance measures that are consistent with the goals included in local general plan documents, and that reflect consideration of environmental, social, and economic goals. It also outlines a Regional Improvement Strategy to serve as overarching guidance to ACTC Commissioners, staff, partners, and the public, in order to carry out the RTP in full.

ACTION AND FINANCIAL ELEMENTS

The purpose of the Action Element is to identify the short-term and long-term actions that will address the needs of the regional transportation system in Amador County and the Goals and Objectives of the RTP. This includes identifying an extensive list of projects needed to improve transportation system operations over the short-term and long-term. Because funding is limited, the ACTC must seek to program projects that will provide the best investment of public funds and assist local jurisdictions in bringing those projects to completion. In selection of projects, the communities must recognize the importance of protecting environmental quality, while maintaining a vital economy. These projects must support local land use and population projections and address economic development and social equity issues identified in the local General Plans.

The Financial Element outlines the financial assumptions and forecasts of transportation costs and revenues necessary to implement the Action Element. The Financial Element presents a constrained funding scenario made up of the revenue which is reasonably expected to be available from existing funding mechanisms currently in place over the planning horizon, including projections of the future STIP, and federal transportation funds.

The Action and Financial Elements address the following topics: Multi-Modal System, Regional Roadways, Local Streets and Roads, Transit, Aviation, Pedestrian/Bicycle, Goods Movement; Rail/Trucking, Alternative Strategies, and Transportation Funding. These topics are discussed in more detail below.

Multi-Modal System

The RTP places a heavy emphasis on the enhancement of multi-modal transportation, so that users have a variety of options when travelling throughout the county. ACTC has committed to undertaking a variety of short-term implementation measures, including steps that will allow the clear measurement and analysis of the current level of performance of the transportation system as a whole. As an objective, the RTP commits to establishing new Performance Goals, Performance

Measures, data sets, and evaluation tools that go beyond Level of Service (e.g. safety, accessibility, connectivity, surface conditions, air pollution, environmental preservation, cost-benefit and/or return on investment, etc.), in order to help better guide multi-modal investments in the Regional Transportation System. These steps will help ensure that the county transportation system is analyzed from a county, regional, and statewide, with regard to achieving the overall multi-modal goals set forth in the RTP.

Regional Roadways

The network of roadways that facilitate the movement of people and goods within and through Amador County is one of the most important components of the overall transportation system. This section of the RTP identifies the regionally significant roadways and the improvements that will be required over the horizon of the Plan.

Specifically, the Objectives contained within the Action Element pertaining to Regional Roadways describe that the appropriate entities will:

- Work with the City of Ione to complete a local Circulation Improvement Program and funding strategy, comparable to those completed for the cities of Plymouth and Jackson.
- Work with Amador County and the cities of Sutter Creek and Jackson to revise and complete the Circulation Improvement Program and funding strategy that was developed for the Martell area in 2009.
- Develop alternative mitigation measures that can be used to help alleviate traffic impacts at constrained locations on the Regional Transportation System to the greatest extent possible.

The Action Element also identifies the short-term and long-term state highway and regional roadway improvements that are currently unfunded, but may be constructed over the plan period if additional revenues are realized or funded by future development. The RTP lists Tier IIA (partially funded) and Tier IIB (unfunded) projects. The total funding shortfall is \$362.3 million. Unless ACTC is able to implement new funding sources, prioritization and scheduling of Tier IIA/B State Highway and Regional Projects listed in the Action Element will be not be possible.

Local Streets and Roads

The Local Streets and Roads section of the Action Element indicates that it is the objective of the ACTC to work with the cities and county to update their local Pavement Management Systems in order to accurately identify the existing and future pavement conditions within their jurisdictions and to prioritize the use of any funds available to improve said conditions. The Action Element also indicates that it is the objective of the ACTC to work with the cities and county to update their local transportation Capital Improvement Programs in order to adequately identify local improvement needs and prioritize the use of any funds available to improve the streets and roads within their jurisdiction.

Transit Services

Currently public transit is a relatively small component of Amador County's transportation system. However, for those citizens who are dependent on these services, public transit is a life sustaining necessity. Also, future enhancements to public transit may prove to be a means of reducing congestion and providing access to jobs. Amador Transit (AT) is the county transit service available to the public. Financial Element Table 5 indicates that there will be sufficient revenue to maintain the existing Amador County transit programs and establish an operating reserve to address the volatility of transit funding. Financial Element Table 5 identifies a short-term funding deficit for Amador County transit and paratransit services. The RTP calls for an update to the ACTC Transit Development Plan/Coordinated Public Transit-Human Services Transportation Plan and Long-range Transit Development Plan over the long term, in tandem with future RTP updates.

Aviation

Although aviation facilities within Amador County do not handle a large number of passenger trips, maintenance and enhancement of regional airports is important for the provision of emergency services and to enhance business and recreational activities. Inclusion of aviation facilities in the Regional Transportation Plan ensures that local airports remain eligible for State and Federal grant funds. The Action Element in the RTP describes the objective to identify safe and reliable ground access and transit connectivity improvements for Westover Field.

Non-Auto Facilities

Pedestrian and bicycle facilities are transportation amenities that enhance mobility and add vitality to communities. While funds for these facilities are limited, it is important to have comprehensive plans in place and projects "on the shelf" to take advantage of grant funding and other opportunities when they are available and to ensure projects are incorporated into future developments. The Objectives include updating the project priorities and cost estimates identified in the Amador Countywide Pedestrian and Bicycle Transportation Plan/Americans with Disabilities Act Transition Plan and developing low-cost strategies to enhance pedestrian, way-finding and bicycle safety.

Goods Movement

Projects that enhance goods movement help to maintain regional economic vitality. Further, the State highways and rail routes that traverse Amador County link the County to the rest of the State and region. As the State of California develops funding programs aimed at improving goods movement, Amador County may be in a position to receive some of those funds for the regional transportation system.

Alternative Strategies

The Action Element describes Objectives and Measures that will allow the ACTC to expand additional ways of meeting the overall RTP goals over the long-term, which include:

- Updating the 2002 Sierra Nevada ITS Strategic Deployment Plan and 2004 Caltrans District 10 Park and Ride Plan.
- Expanding utilization of the Sutter Hill Transit Center (SHTC) through developing and coordinating its various components such as marketing the video-conference facility, constructing power-generating parking lot shade structures, and planning adjacent Transit Oriented Developments with willing partners.

Transportation Funding

In order to help close the gap between the funds needed to meet all of the goals identified in the RTP, this Topic addresses strategies to gain additional potential funding, including:

- Developing and implementing a formal process to prioritize and allocate any pedestrian or bicycle transportation funds available through the ACTC in order to leverage additional outside funds and complete the priority improvements identified in the Amador Countywide Pedestrian and Bicycle Transportation Plan/American with Disabilities Act Transition Plan.
- Updating the Capital Improvement Program and AB 1600 Nexus Plan for the Regional Traffic Mitigation Fee (RTMF) program under direction of the RTMF Oversight Committee.
- Working with the cities, county, and ACTC to streamline administration of the RTMF program.
- Developing a Regional funding and implementation program designed to fund specific local road maintenance, rehabilitation, and pedestrian/bicycle projects on an annual basis.

PROCEDURAL BACKGROUND

NOP Public Circulation and Initial Study: The ACTC circulated a Notice of Preparation (NOP) of an EIR for the proposed project on March 2, 2015 to trustee and responsible agencies, the State Clearinghouse (SCH# 2015032001), and the public. One comment was provided from the Central Valley Regional Water Quality Control Board. The NOP and comment are presented in Appendix A. of the Draft EIR.

Notice of Availability and Draft EIR: The ACTC published a public Notice of Availability (NOA) for the Draft EIR on May 15, 2015, inviting comment from the general public, agencies, organizations, and other interested parties. The NOA was filed with the State Clearinghouse (SCH # 2015032001) and the County Clerk, and was published in a regional newspaper pursuant to the public noticing requirements of CEQA. The Draft EIR was available for public review from May 15 through June 29, 2015. The Draft EIR contains a description of the project, description of the environmental setting, identification of project impacts, and mitigation measures for impacts found to be significant, as well as an analysis of project alternatives, identification of significant irreversible environmental changes, growth-inducing impacts, and cumulative impacts. The Draft EIR identifies issues determined to have no impact or a less than significant impact, and provides detailed analysis of potentially significant and significant impacts. Comments received in response to the NOP were considered in preparing the analysis in the Draft EIR.

Final EIR: The ACTC received four (4) comment letters during the Draft EIR public review period. No additional oral or written comments were received. In accordance with CEQA Guidelines Section 15088, this Final EIR responds to the written comments received. The Final EIR also contains minor edits to the Draft EIR, which are included in Section 3.0, Errata, and the Draft EIR, as amended herein, constitute the Final EIR.

Responses to comments received during the comment period do not involve any new significant impacts or “significant new information” that would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5. Each response is provided in the Final EIR.

RECORD OF PROCEEDINGS AND CUSTODIAN OF RECORD

For purposes of CEQA and the findings set forth herein, the record of proceedings for the ACTC’s findings and determinations consists of the following documents and testimony, at a minimum:

- The NOP, comments received on the NOP, and all other public notices issued by the ACTC in relation to the Project (e.g., Notice of Availability).
- The Draft EIR and Final EIR, including comment letters, and technical materials cited in the documents.
- All non-draft and/or non-confidential reports and memoranda prepared by the ACTC and consultants in relation to the EIR.
- Minutes and transcripts of the discussions regarding the Project and/or Project components at public hearings held by the ACTC.
- Staff reports associated with ACTC Board meetings on the Project.
- Those categories of materials identified in Public Resources Code Section 21167.6.

The ACTC is the custodian of the administrative record. The documents and materials that constitute the administrative record are available for review at the Amador County Transportation Commission 117 Valley View Way Sutter Creek, CA 95685.

FINDINGS REQUIRED UNDER CEQA

Public Resources Code section 21002 provides that “public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects[.]” Further, the procedures required by CEQA “are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects.” (*Id.*) Section 21002 also provides that “in the event specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof.”

The mandate and principles established by the Legislature in Public Resources Code section 21002 are implemented, in part, through the requirement in Public Resources Code section 21081 that agencies must adopt findings before approving projects for which an EIR is required.

CEQA Guidelines section 15091 provides the following direction regarding findings:

(a) No public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. The possible findings are:

(1) Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR.

(2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.

(3) Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.

(See also Pub. Resources Code, § 21081, subd. (a)(1)-(3).)

As defined by CEQA, “feasible” means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, legal, and technological factors. (Pub. Resources Code, § 21061.1; see also CEQA Guidelines, § 15126.6(f)(1) [determining the feasibility of alternatives].) The concept of “feasibility” also encompasses the question of whether a particular alternative or mitigation measure promotes the underlying goals and objectives of a project. (See *Association of Irrigated Residents v. County of Madera* (2003) 107 Cal.App.4th 1383, 1400 [court upholds findings rejecting a “reduced herd” alternative to a proposed dairy as infeasible because the alternative failed to meet the “fundamental objective” of the project to produce milk]; *Sierra Club v. County of Napa* (2004) 121 Cal.App.4th 1490, 1506-1508 [agency decision-makers, in rejecting alternatives as infeasible, appropriately relied on project objective articulated by project applicant].) Moreover, “‘feasibility’ under CEQA encompasses ‘desirability’ to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, legal, and technological factors.” (*City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 410, 417; see also *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 1001-1002.

With respect to a project for which significant impacts cannot be feasibly avoided or substantially lessened, a public agency may nevertheless approve the project if the agency first adopts a statement of overriding considerations setting forth the specific reasons that the project’s benefits outweigh its significant unavoidable adverse environmental effects. (Pub. Resources Code, §§ 21001, 21002.1(c), 21081(b).)

CEQA FINDINGS

CEQA Guidelines section 15093 provides the following direction regarding a statement of overriding considerations:

(a) CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered “acceptable.”

(b) When the lead agency approves a project which will result in the occurrence of significant effects which are identified in the final EIR but are not avoided or substantially lessened, the agency shall state in writing the specific reasons to support its action based on the final EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record.

(c) 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. This statement does not substitute for, and shall be in addition to, findings required pursuant to Section 15091.

MITIGATION MONITORING PROGRAM

A Mitigation Monitoring Program has been prepared for the Project and has been adopted concurrently with these Findings. (See Pub. Resources Code, § 21081.6, subd. (a)(1).) The ACTC will use the Mitigation Monitoring Program to track compliance with Project mitigation measures.

CONSIDERATION OF THE ENVIRONMENTAL IMPACT REPORT

In adopting these Findings, this Board finds that the Final EIR was presented to this Board, the decision-making body of the lead agency, which reviewed and considered the information in the Final EIR prior to approving the Project. By these findings, this Board ratifies, adopts, and incorporates the analysis, explanation, findings, responses to comments, and conclusions of the Final EIR. The ACTC Board finds that the Final EIR was completed in compliance with CEQA. The Final EIR represents the independent judgment of the ACTC.

SEVERABILITY

If any term, provision, or portion of these Findings or the application of these Findings to a particular situation is held by a court to be invalid, void, or unenforceable, the remaining provisions of these Findings, or their application to other actions related to the Project, shall continue in full force and effect unless amended or modified by the ACTC.

III. FINDINGS AND RECOMMENDATIONS REGARDING SIGNIFICANT AND UNAVOIDABLE IMPACTS

A. GREENHOUSE GASES AND CLIMATE CHANGE

1. IMPACT 3.2.1: GENERATE GREENHOUSE GAS EMISSIONS, EITHER DIRECTLY OR INDIRECTLY, THAT MAY HAVE A SIGNIFICANT IMPACT ON THE ENVIRONMENT.
 - (a) Potential Impact. The potential for the Project to result in impacts to GHG emissions in the region is discussed on pages 3.2-9 through 3.2-13 of the Draft EIR.
 - (b) Mitigation Measures. The following mitigation measures are hereby adopted and will be implemented as provided by the Mitigation Monitoring Program: Mitigation Measures 3.2-1, 3.2-2, 3.2-3, 3.2-4, and 3.2-5 would reduce GHG impacts to the greatest extent feasible. There is no additional feasible mitigation available that would reduce this impact to a less than significant level.
 - (c) Findings. Based upon the EIR and the entire record before this Board, this Board finds that:
 - (1) Effects of Mitigation and Remaining Impacts. Implementation of mitigation measures 3.2-1, 3.2-2, 3.2-3, 3.2-4, and 3.2-5 will assist in the reduction of per capita VMT levels throughout Amador County, which will assist in meeting the stated goals of AB 32. As described throughout the 2015 RTP, ACTC has included numerous projects and programs to promote the use and expansion of alternative transportation systems throughout the County and they continue to coordinate with local land use agencies to assist in the development of plans and policies aimed at reducing VMT. However, even after implementation of all of the policies, action plans, and mitigation measures included in the RTP and EIR, the proposed project will still contribute to an overall significant increase in GHG emission generated in Amador County. Therefore, this is considered a cumulatively considerable and significant and unavoidable impact. There is no additional feasible mitigation available that would reduce this impact to a less than significant level.
 - (2) Overriding Considerations. The environmental, economic, social and other benefits of the Project override any remaining significant adverse impact of the Project associated with impacts to GHG emissions in the region, as more fully stated in the Statement of Overriding Considerations in Section VII, below.
2. IMPACT 4.2: INCREASED TRANSPORTATION GREENHOUSE GAS EMISSIONS MAY CONTRIBUTE TO CLIMATE CHANGE.
 - (c) Potential Impact. The potential for the Project to result in increased transportation greenhouse gas emissions, which may contribute to climate change is discussed on page 4.0-5 of the Draft EIR.

- (b) Mitigation Measures. No additional feasible mitigation measures were identified beyond those discussed under Impact 3.2.1.
- (c) Findings. Based upon the EIR and the entire record before this Board, this Board finds that:
 - (1) Effects of Mitigation and Remaining Impacts. The proposed project would have a cumulatively considerable contribution to climate change and global warming. CO2 emissions are projected to increase by 161 tons per day from 1990 through the 2035 planning horizon. CO2 emissions were 406 tons per day in the AB32 threshold date of 1990 and are projected to be 568 tons per day by the AB 32 attainment date of 2035. The trend is decreasing during the planning horizon. The CO2 emissions are related to a projected increase in VMT as a result of projected growth in region. ACTC has included numerous projects and programs to promote the use and expansion of alternative transportation systems throughout the County and they continue to coordinate with local land use agencies to assist in the development of plans and policies aimed at reducing VMT. Implementation of the Mitigation Measures 3.2-1, 3.2-2, 3.2-3, 3.2-4, and 3.2-5 will assist in the reduction of per capita VMT levels throughout Amador County, which will assist in meeting the stated goals of AB 32. However, even after implementation of all of the policies, action plans, and mitigation measures included in the RTP and EIR, the proposed project will still contribute to an overall increase in GHGs generated in Amador County. Therefore, this is considered a cumulatively considerable and significant and unavoidable impact. There is no additional feasible mitigation available that would reduce this impact to a less than significant level.
 - (2) Overriding Considerations. The environmental, economic, social and other benefits of the Project override any remaining significant adverse impact of the Project associated with cumulative GHG impacts in the region, as more fully stated in the Statement of Overriding Considerations in Section VII, below.

B. TRANSPORTATION AND CIRCULATION

- 1. IMPACT 3.4-1: CAUSE AN INCREASE IN TRAFFIC WHICH IS SUBSTANTIAL IN RELATION TO THE EXISTING TRAFFIC LOAD AND CAPACITY OF THE STREET SYSTEM.
 - (a) Potential Impact. The potential for the Project to result in an increase in traffic, which is substantial in relation to the existing traffic load and capacity of the street system is discussed on pages 3.4-18 through 3.4-20 of the Draft EIR.
 - (b) Mitigation Measures. No feasible mitigation measures were identified.
 - (c) Findings. Based upon the EIR and the entire record before this Board, this Board finds that:

- (1) Effects of Mitigation and Remaining Impacts. The 2015 RTP has been developed to support planned and proposed growth in the region, but does not involve approvals of development projects. Forecasted growth in the County will result in increased vehicle miles traveled and daily trips regardless of the proposed project. The proposed project includes funding and other strategies that are aimed at improving transportation conditions, including level of service on roadways and intersections that are operating at unacceptable levels of service. These are beneficial impacts to the transportation system in Amador County; however, there will be funding shortfalls due to funding constraints. It will not be possible to fund all transportation improvements that are needed in the region through the 2015 RTP. Ultimately it will be the responsibility for local land use agencies to collect development fees to fund projects that are needed, but not able to be funded through the 2015 RTP. This significant impact would be reduced to a less than significant impact if each land use agency does in fact fund improvements that maintain their respective roadways to their level of service standard under future conditions. The collection of development fees by local agencies to finance needed improvements would ensure that levels of service are maintained in their jurisdiction; however, this is not something that ACTC can control or guarantee. Therefore, implementation of the proposed project would have a significant and unavoidable impact. There is no feasible mitigation available that would reduce this impact to a less than significant level.
- (2) Overriding Considerations. The environmental, economic, social and other benefits of the Project override any remaining significant adverse impact of the Project associated with an increase in traffic, which is substantial in relation to the existing traffic load and capacity of the street system, as more fully stated in the Statement of Overriding Considerations in Section VII, below.

IV. FINDINGS AND RECOMMENDATIONS REGARDING SIGNIFICANT IMPACTS WHICH ARE MITIGATED TO A LESS THAN SIGNIFICANT LEVEL

A. AIR QUALITY

1. IMPACT 3.1-2: SHORT-TERM - CONFLICT WITH, OR OBSTRUCT, THE APPLICABLE AIR QUALITY PLAN, CAUSE A VIOLATION OF AIR QUALITY STANDARDS, CONTRIBUTE SUBSTANTIALLY TO AN EXISTING AIR QUALITY VIOLATION, OR RESULT IN A CUMULATIVELY CONSIDERABLE NET INCREASE OF A CRITERIA POLLUTANT IN A NON-ATTAINMENT AREA.

- (a) Potential Impact. The potential for the Project to conflict with, or obstruct, the applicable air quality plan, cause a violation of air quality standards, contribute substantially to an existing air quality violation, or result in a cumulatively considerable net increase of a criteria pollutant in a non-attainment area is discussed on pages 3.1-14 through 3.1-15 of the Draft EIR.

- (b) Mitigation Measures. The following mitigation measure is hereby adopted and will be implemented as provided by the Mitigation Monitoring Program: Mitigation Measure 3.1-1.
- (c) Findings. Construction activities associated with construction and implementation of the various roadway and other transportation improvement projects identified in the RTP would result in temporary short-term emissions associated with vehicle trips from construction workers, operation of construction equipment, and the dust generated during construction activities. These temporary and short-term emissions would generate additional ozone precursors (ROG and NOx) as well as PM₁₀, which could exacerbate the County's existing non-attainment status for these criteria pollutants.

Construction projects in Amador County, including the construction of the roadway and other transportation improvements identified in the RTP, are required to receive a permit from Amador County Air Pollution Control District. APCD has existing rules and regulations in place to reduce construction related emissions and dust impacts. All future roadway and other transportation construction projects associated with implementation of the RTP would be subject to the existing APCD requirements. Implementation of these measures requires the development of a dust control plan and the construction operators to take special precautions during construction, including grading, paving, and maintenance of roads and other improvements that would reduce emissions of particulate matter, ozone precursors, and other pollutants. Compliance with the APCD pre-established rules will ensure that short-term air quality impacts are reduced to a less than significant level.

In accordance with Public Resources Code, § 21081, Mitigation Measure 3.1-1 is an appropriate change or alteration that has been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the EIR. Based upon the EIR and the entire record before this Board, this Board finds that the potential to conflict with, or obstruct, the applicable air quality plan, cause a violation of air quality standards, contribute substantially to an existing air quality violation, or result in a cumulatively considerable net increase of a criteria pollutant in a non-attainment area will be mitigated to a less than significant level.

2. IMPACT 3.1-3: OCCASIONAL LOCALIZED CARBON MONOXIDE CONCENTRATIONS FROM TRAFFIC CONDITIONS AT SOME INDIVIDUAL LOCATIONS.

- (a) Potential Impact. The potential for the Project to impact occasional localized carbon monoxide concentrations from traffic conditions at individual locations is discussed on page 3.1-15 of the Draft EIR.
- (b) Mitigation Measures. The following mitigation measure is hereby adopted and will be implemented as provided by the Mitigation Monitoring Program: Mitigation Measure 3.1-2.

- (c) Findings. While the RTP projects will respond to additional traffic and reducing congestion (brought by that additional traffic) system-wide, there is a potential for CO concentrations or hot spots to develop under adverse atmospheric conditions that prevent a rapid dispersion of CO. Currently, the Mountain Counties Air Basin is in attainment of federal and State standards for CO. Nonetheless, there is a potential for some, albeit rare, instances of congestion and an occasional hot spot. Mitigation measure 3.1-2 would require the screening of individual RTP projects at the time of design for localized CO hotspot concentrations and, if necessary, incorporate project-specific measures into the project design to reduce or alleviate CO hotspot concentrations. This will ensure traffic flows near sensitive receptors are improved in order to reduce the potential for the formation of CO hot spots. Implementation of mitigation measure 3.1-2 would reduce this impact to a less than significant level.

In accordance with Public Resources Code, § 21081, Mitigation Measure 3.1-2 is an appropriate change or alteration that has been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the EIR. Based upon the EIR and the entire record before this Board, this Board finds that the potential for the Project to impact occasional localized carbon monoxide concentrations from traffic conditions at individual locations will be mitigated to a less than significant level.

3. IMPACT 3.1-5: POTENTIAL TO RELEASE ASBESTOS FROM EARTH MOVEMENT OR STRUCTURAL ASBESTOS FROM DEMOLITION/RENOVATION OF EXISTING STRUCTURES.

- (a) Potential Impact. The potential for the Project to result in impacts from the release asbestos from earth movement, or structural asbestos from demolition/renovation of existing structures is discussed on pages 3.1-15 through 3.1-16 of the Draft EIR.
- (b) Mitigation Measures. The following mitigation measure is hereby adopted and will be implemented as provided by the Mitigation Monitoring Program: Mitigation Measure 3.1-3.
- (c) Findings. Demolition and excavation activities of facilities containing asbestos requires monitoring to insure that they are properly removed and disposed in accordance with local and State regulations. Based upon the regional nature of the RTP, development of detailed, site-specific information on this impact at an RTP planning level is not feasible. The implementing agency of each RTP project will conduct appropriate project-level assessments and will be responsible for consideration of mitigation measures for significant effects on the environment. If asbestos is deemed present naturally, or in existing facilities, an Asbestos Hazard Dust Mitigation Plan would be prepared to ensure that adequate dust control and asbestos hazard mitigation measures are implemented during project construction. Mitigation Measure 3.1-3 would ensure that any construction activities that may result in the release of asbestos would include appropriate measures contained within an Asbestos Hazard Dust Mitigation Plan to ensure that exposure to construction workers and the public is

minimized to acceptable State and local levels. Implementation of Mitigation Measure 3.1-3 would ensure that this potential impact is reduced to a less than significant level.

In accordance with Public Resources Code, § 21081, Mitigation Measure 3.1-3 is an appropriate change or alteration that has been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the EIR. Based upon the EIR and the entire record before this Board, this Board finds that the potential for the Project to result in impacts from the release asbestos from earth movement, or structural asbestos from demolition/renovation of existing structures will be mitigated to a less than significant level.

B. LAND USE AND POPULATION

1. IMPACT 3.3-1: PHYSICAL DIVISION OF AN ESTABLISHED COMMUNITY.

- (a) Potential Impact. The potential for the Project result in the physical division of an established community is discussed on pages 3.3-7 through 3.3-8 of the Draft EIR.
- (b) Mitigation Measures. The following mitigation measure is hereby adopted and will be implemented as provided by the Mitigation Monitoring Program: Mitigation Measure 3.3-1.
- (c) Findings. The majority of RTP projects would involve transportation system improvements to existing facilities, which would mostly occur within or in close proximity to existing rights-of-way. Some RTP projects will involve new facilities that will occur within or adjacent to existing communities. New facilities may include roadway widening, roadway extensions, bicycle lanes, bicycle/pedestrian paths, bridges, interchanges, and park-n-ride lots. Additionally, the 2015 RTP includes measures that are intended to provide the existing land uses with a complete transportation system that has a broader level of safe transportation choices for the citizens. A complete transportation system with more safe choices provides an enhancement to the quality of life within the community.

In many cases, improvements to facilities will occur where communities are already physically divided by existing facilities, including highways, roadways, intersections, interchanges, transit routes, and airports. The 2015 RTP is intended to improve inter- and intra-regional connectivity and new or improved land use linkages. However, specific projects, such as multimodal stations, interchange improvements, and rail improvements have the potential to divide existing contiguous land uses. Because these potential improvement projects could occur within incorporated areas, cities or communities could be affected. Additionally, intersection and interchange improvements may create visual and physical barriers between adjacent land uses in cities.

Because the proposed project is a planning document and thus, no physical changes will occur to the environment, adoption of the proposed project would not directly

impact the environment. It is assumed that RTP projects that affect roads and interchanges present the greatest potential for impacts regarding the division of an established community. Mitigation Measure 3.3-1 would ensure that all RTP projects are designed to maintain the cohesiveness of the existing communities to the greatest extent feasible. Where full design mitigation is not feasible, measures would be incorporated into the design to minimize the impacts associated with project implementation. Adherence to the requirements Mitigation Measure 3.3-1 would reduce this impact to a less than significant level.

In accordance with Public Resources Code, § 21081, Mitigation Measures 3.3-1 is an appropriate change or alteration that has been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the EIR. Based upon the EIR and the entire record before this Board, this Board finds that the potential for adverse effects regarding the physical division of an established community will be mitigated to a less than significant level.

C TRANSPORTATION AND CIRCULATION

1. IMPACT 3.4-5: RESULT IN INADEQUATE EMERGENCY ACCESS.

- (a) Potential Impact. The potential for the Project to result in inadequate emergency access is discussed on page 3.4-21 of the Draft EIR.
- (b) Mitigation Measures. The following mitigation measure is hereby adopted and will be implemented as provided by the Mitigation Monitoring Program: Mitigation Measure 3.4-1.
- (c) Findings. The RTP does not propose any specific projects that are believed to result in inadequate emergency access. In some cases, the RTP would provide increased regional connectivity and should improve movement of emergency vehicles. However, emergency access could potentially be affected during construction activities associated with implementation of the various roadway, transit, and bicycle/pedestrian improvement projects identified in the RTP. The implementing agency for each improvement project would be responsible for coordinating with the emergency providers to ensure that emergency routes remain available during construction activities. Mitigation Measure 3.4-1 requires implementing agencies to develop a traffic control plan for construction projects to reduce the effects of construction on the roadway system throughout the construction period. As part of the traffic control plan for individual projects, project proponents shall coordinate with emergency service providers to ensure that emergency routes are identified and remain available during construction activities. Implementation of Mitigation Measure 3.4.1 would reduce this impact to a less-than-significant level.

In accordance with Public Resources Code, § 21081, Mitigation Measures 3.4-1 is an appropriate change or alteration that has been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as

identified in the EIR. Based upon the EIR and the entire record before this Board, this Board finds that the potential for the Project to result in inadequate emergency access will be mitigated to a less than significant level.

V. FINDINGS AND RECOMMENDATIONS REGARDING THOSE IMPACTS WHICH ARE LESS THAN SIGNIFICANT OR LESS THAN CUMULATIVELY CONSIDERABLE

A. LESS THAN SIGNIFICANT IMPACTS

1. Specific impacts within the following categories of environmental effects were found to be less than significant as set forth in more detail in the Draft EIR.

Air Quality: The following specific impacts were found to be less than significant: 3.1-1 and 3.1-4.

Greenhouse Gases and Climate Change: The following specific impacts were found to be less than significant: 3.2.2.

Land Use and Population: The following specific impacts were found to be less than significant: 3.3-2, 3.3-3, 3.3-4, and 3.3-5.

Transportation and Circulation: The following specific impacts were found to be less than significant: 3.4-2, 3.4-3, 3.4-4, and 3.4-6.

B. LESS THAN CUMULATIVELY CONSIDERABLE IMPACTS

1. The project was found to have a less than cumulatively considerable contribution to specific impacts within the following categories of environmental effects as set forth in more detail in the Draft EIR.

Air Quality: The following specific impacts were found to be less than cumulatively considerable: 4.1

Land Use and Population: The following specific impacts were found to be less than cumulatively considerable: 4.3

Transportation and Circulation: The following specific impacts were found to be less than cumulatively considerable: 4.4

C. INITIAL STUDY

1. Specific impacts within the following categories of environmental effects were found to be less than significant and less than cumulatively considerable as set forth in more detail in the Initial Study (IS), and were not analyzed in a greater level of detail in the EIR.

Aesthetics: The following specific impacts were found to be less than significant and less than cumulatively considerable: a), b), c), and d).

Agricultural Resources: The following specific impacts were found to be less than significant and less than cumulatively considerable: a), b), and c).

Biological Resources: The following specific impacts were found to be less than significant and less than cumulatively considerable: a), b), c), d), e), and f).

Cultural Resources: The following specific impacts were found to be less than significant and less than cumulatively considerable: a), b), c), and d).

Geology and Soils: The following specific impacts were found to be less than significant and less than cumulatively considerable: a) i), ii), iii), iv), b), c), d), and e).

Hazards and Hazardous Materials: The following specific impacts were found to be less than significant and less than cumulatively considerable: a), b), c), d), e), f), g), and h).

Hydrology and Water Quality: The following specific impacts were found to be less than significant and less than cumulatively considerable: a), b), c), d), e), f), g), h), i), and j).

Land Use and Population: The following specific impacts were found to be less than significant and less than cumulatively considerable: c).

Mineral Resources: The following specific impacts were found to be less than significant and less than cumulatively considerable: a), and b).

Noise: The following specific impacts were found to be less than significant and less than cumulatively considerable: a), b), c), d), e), and f).

Public Services: The following specific impacts were found to be less than significant and less than cumulatively considerable: a), b), c), d), and e).

Recreation: The following specific impacts were found to be less than significant and less than cumulatively considerable: a), b).

Utilities and Services Systems: The following specific impacts were found to be less than significant and less than cumulatively considerable: a), b), c), d), e), f), and g).

The above impacts are less than significant or less than cumulatively considerable for one of the following reasons:

- The EIR determined that the impact is less than significant for the Project.
- The EIR determined that the Project would have a less than cumulatively considerable contribution to the cumulative impact.
- The EIR determined that the impact is beneficial (would be reduced) for the Project.
- The Initial Study (IS) determined that the Project would have a less than significant and less than cumulatively considerable impact:

VI. PROJECT ALTERNATIVES

A. IDENTIFICATION OF PROJECT OBJECTIVES

An EIR is required to identify a range of reasonable alternatives to the project. The “range of potential alternatives to the project shall include those that could feasibly accomplish most of the basic purposes of the project and could avoid or substantially lessen one or more of the significant effects.” (CEQA Guidelines Section 15126.6(c).) “Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent).” (CEQA Guidelines Section 15126.6(f)(1).)

Chapter 2.0 (page 2.0-3) of the Draft EIR identifies the Project’s goals and objectives. The overall Project objectives include the following:

- Reduce traffic congestion and improve human mobility
- Enhance safety throughout the Plan Area
- Optimize community connectivity
- Support positive socioeconomic growth and a sustainable Broad-based economy
- Preserve or enhance community character and the environment
- Ensure the implementation of a feasible funding plan
- Preserve the existing transportation system.

B. ALTERNATIVE CONSIDERATION

1. RECOMMENDED ALTERNATIVES:

A Notice of Preparation (NOP) was circulated to the public to solicit recommendations for a reasonable range of alternatives to the 2015 RTP. Additionally, a public scoping meeting was held during the public review period to solicit recommendations for a reasonable range of alternatives to the proposed Project. No specific alternatives were recommended by commenting agencies or the general public during the NOP public review process.

The Draft EIR was also circulated for public review and comment. No specific alternatives were recommended by commenting agencies or the general public during the Draft EIR public review process that were not previously considered by the ACTC.

C. ALTERNATIVES ANALYSIS IN EIR

1. NO PROJECT ALTERNATIVE

The No Project Alternative is discussed on pages 5.0-4, and 5.0-5 through 5.0-6 of the Draft EIR. The No Project Alternative is the continuation of ACTC's adopted 2004 RTP into the future.

Findings: The No Project Alternative would implement fewer transportation improvement projects compared to the other alternatives, which would result in a reduction in construction-related emissions. However, fewer transportation improvement projects would result in increased congestion on area roadways since operational improvements needed to improve traffic flows and decrease idling times would not occur under this alternative.

The No Project Alternative would not reflect changes in land uses that have been approved since the 2004 RTP was adopted and it would also not be consistent with planning efforts that are currently underway or completed, including general plan updates/amendments. The region would not have a planned roadway network that is coordinated with land uses in a way that enable the achievement of GHG reductions pursuant to AB 32.

The No Project Alternative would result in an increase in vehicle hours of travel and hours of delay compared to the other alternatives, which is an indicator of more congestion. This alternative would have fewer improvement projects that address safety deficiencies; thus, it would be anticipated to result in more accidents and potentially an increase in injuries and fatalities.

No Project Alternative is inferior to the other alternatives, and would not achieve the project objectives. The No Project Alternative would result in an infrastructure system not consistent with current growth and population projections for the County and its communities. For these reasons, this alternative is rejected.

2. EXPAND EXISTING HIGHWAY ALTERNATIVE:

The Expand Existing Highways Alternative is discussed on pages 5.0-4 and 5.0-6, through 5.0-7 of the Draft EIR. This alternative would focus exclusively on expanding the capacity of the State Highway System in order to maintain the ACTC's and Caltrans' currently adopted LOS standards.

Findings: This alternative would implement fewer local-level transportation improvement projects compared with the other alternatives, which would result in a reduction in local level construction emissions and an increase in highway construction emissions, which is anticipated to be largely a no net change in total construction emissions. No local-level transportation improvement projects would result in increased congestion on local area roadways since operational improvements needed to improve traffic flows and decrease idling times would not occur under this alternative. Vehicle hours of travel and hours of delay would be greater on local-level roads than other alternatives, but would be improved on highways. Although this alternative would lead to reduced highway congestion, operational impacts on the local roadway system would be greater than the other alternatives in terms of congestion. Overall, this alternative would have a slightly worse effect on air quality and greenhouse gas emissions when compared to the Implement Multi-Modal Program – Financially

Unconstrained Alternative. This alternative would be better than the Emphasize Local Road rehabilitation And Maintenance Alternative and the No Project Alternative.

This alternative would partially reflect changes in land uses that have been approved since the 2004 RTP was adopted, but would partially be consistent with planning efforts that are currently underway or completed, including general plan updates/amendments. In essence, the transportation funding needed to accommodate the multi-modal transportation needs of the community would not be provided, instead the focus would be an expanding highways. The region would have a planned roadway network that is only partially coordinated with land uses. The Expand Existing Highways Alternative would result in a mobile transportation infrastructure system consistent with current growth and population projections for the county and its communities, but would not provide adequate funding toward the non-mobile transportation needs of the community. Therefore, this alternative would have a worse effect on land use and population than the Implement Multi-Modal Program – Financially Unconstrained Alternative, but would be better than the Emphasize Local Road rehabilitation And Maintenance Alternative and the No Project Alternative.

This alternative would result in a reduction in vehicle hours of travel and hours of delay on the State Highway System, but would result in an increase in vehicle hours of travel and hours of delay on local roadways, compared to the other alternatives. Ultimately, this would be a shift in congestion and level of service deficiencies from highways to local roadways, with highways being the beneficiary to the improvements. It would be anticipated that the local land use authorities would emphasize improvements as necessary to their own local roadway network, and new development would be more responsible for funding transportation improvements needed to improve level of service even if they are not fully responsible for the deficiencies. The local land use agencies could see challenges to development of infrastructure if new development is required to cover more than their fair-share cost of improvements. Funding challenges at the local level would likely become a concern and potential obstacle for development. This alternative would have fewer improvement projects that address local safety deficiencies; thus, it would be anticipated to result in a higher level of accidents and potentially an increase in injuries and fatalities within the local network. Overall, this alternative would be similar, but would have a slightly worse effect on transportation and circulation when compared to the Implement Multi-Modal Program – Financially Unconstrained Alternative. This alternative would be better than the Emphasize Local Road rehabilitation And Maintenance Alternative and the No Project Alternative because it would provide more extensive funding for transportation improvements.

While the ACTC recognizes some potential benefits of this alternative, this alternative is not consistent with the RTP objectives. Because this alternative focuses exclusively on increasing roadway capacity in order to maintain adopted Level of Service standards, it would not sufficiently address the RTP's other Desired Outcomes such as

optimizing community connectivity and enhancing safety. Further, the environmental, right-of-way, and community impacts that would likely result from this alternative would not be compatible with the Desired Outcomes to preserve or enhance the Region's community character and environment. Lastly, anticipated funding constraints would likely make this alternative infeasible to carry out, thereby conflicting with the Desired Outcome to ensure implementation of a feasible funding plan. For these reasons, this alternative is rejected.

3. EMPHASIZE LOCAL ROAD REHABILITATION AND MAINTENANCE

The Emphasize Local Road Rehabilitation and Maintenance Alternative is discussed on pages 5.0-5, and 5.0-7 through 5.0-8 of the Draft EIR. This alternative would prioritize all eligible and available funding for local road rehabilitation and maintenance purposes.

Findings: This alternative would implement more local-level transportation improvement projects compared with the other alternatives, which would result in an increase in local level construction GHG and air quality emissions compared with the other alternatives. However, because this alternative does not adequately address congestion reduction, roadway congestion would increase. Overall vehicle hours of travel and hours of delay would be greater than other alternatives. Operational impacts related to GHG and air quality emissions would be greater than the other alternatives.

This alternative would result in a transportation infrastructure system that is improved from an infrastructure age stand point, but would not provide adequate funding toward the non-mobile transportation needs of the community. Therefore, this alternative would have a worse effect on land use and population than the Implement Multi-Modal Program – Financially Unconstrained Alternative and Expand Highways Alternative, but would be better than the No Project Alternative.

This alternative would have fewer improvement projects that address congestion, level of service deficiencies, safety deficiencies, and alternative modes of transportation; thus, it would be anticipated to result in more congestion, increased deficiencies, more accidents and potentially an increase in injuries and fatalities, and less opportunities for citizens to use alternative modes of transportation.

Because this alternative would prioritize improving the Region's pavement conditions, it would not adequately address other Desired Outcomes such as reducing congestion, improving human mobility, and enhancing safety. Further, many of the funding opportunities available to the cities, county, and ACTC are not eligible for maintenance purposes. Hence, this alternative would also not utilize all available funding to the greatest extent possible for these other regional priorities. For these reasons, this alternative is rejected.

4. IMPLEMENT MULTI-MODAL CIRCULATION IMPROVEMENT PROGRAM – FINANCIALLY UNCONSTRAINED

The Implement Multi-Modal Circulation Improvement Program – Financially Unconstrained Alternative is discussed on pages 5.0-5, and 5.0-9 through 5.0-10 of the Draft EIR. This alternative represents the financially unconstrained version of the Multi-Modal Circulation Improvement Program. This alternative incorporates all relevant modes of transportation through a diverse mix of strategically prioritized regional roadway improvements and alternative strategies designed to meet the region’s various transportation needs to the greatest extent possible, given environmental, right of way, community-acceptance, and funding constraints.

Findings: This alternative would focus broadly, balancing the need to expand the capacity of the State Highway System as well as the local roadway system. These improvements would result in a reduction congestion on highway and local area roadways since operational improvements needed to improve traffic flows and decrease idling times would occur under this alternative. Vehicle hours of travel and hours of delay would be lower on highway and local-level roads when compared to other alternatives. Overall, this alternative would be slightly better in terms of air quality and greenhouse gas emissions when compared to the Expand Existing Highways Alternative. This alternative would be better than the Emphasize Local Road rehabilitation And Maintenance Alternative and the No Project Alternative.

Vehicle hours of travel and hours of delay would be lower on highway and local-level roads when compared to other alternatives. This alternative would also have greater improvement projects that address safety deficiencies; thus, it would be anticipated to result in fewer accidents and potentially an increase in injuries and fatalities. Overall, this alternative would be superior to the other alternatives relative to transportation and circulation.

While the ACTC recognizes potential benefits of this alternative relating to air quality and GHG emissions reductions, as well as reductions to VMT and vehicle delay, funding constraints identified in the Financial Element of the Draft RTP make this alternative not feasible even though it is identified as superior to the other alternatives. This is because a significant number of desired improvements across all modes of transportation will remain un-fundable within the RTP’s 20-year horizon until additional sources of funding are created. For these reasons, this alternative is rejected.

5. ENVIRONMENTALLY SUPERIOR ALTERNATIVE:

CEQA requires that an environmentally superior alternative be identified among the alternatives that are analyzed in the EIR. If the No Project Alternative is the environmentally superior alternative, an EIR must also identify an environmentally superior alternative among the other alternatives (CEQA Guidelines Section 15126.6(e)(2)). The environmentally superior alternative is

that alternative with the least adverse environmental impacts when compared to the proposed project.

As discussed in Chapter 5 of the Draft EIR and summarized in Table 5.0-1 of the Draft EIR, the **Implement Multi-Modal Program – Financially Unconstrained Alternative** has the lowest overall impact and is the **environmentally superior alternative**. The Implement Multi-Modal Program – Financially Unconstrained has greater environmental benefits relative to air quality, greenhouse gas emissions, land use and population, and transportation. This alternative is deemed the environmentally superior alternative because it provides the greatest reduction of potential impacts in comparison to the other alternatives including the proposed project. The feasibility of the environmentally superior alternative is not fully possible based on the funding availability over the planning horizon. At this time funding is programmed for a portion of the projects listed under this alternative (Tier I constrained project list), while funding is not programmed for the Tier II unconstrained project list. The ACTC will need to consider the funding limitations of additional projects from the unconstrained list of projects vs. constrained list of projects for the region as additional funds become available in the future. For the reasons provided above, this alternative is rejected.

The Emphasize Local Road Rehabilitation and Maintenance Alternative ranks second to the environmentally superior alternative. However, because this alternative would prioritize improving the Region's pavement conditions, it would not adequately address other Desired Outcomes such as reducing congestion, improving human mobility, and enhancing safety. Further, many of the funding opportunities available to the cities, county, and ACTC are not eligible for maintenance purposes. Hence, this alternative would also not utilize all available funding to the greatest extent possible for these other regional priorities. For the reasons provided above, this alternative is rejected.

The Expand Existing Highway Alternative ranks third to the environmentally superior alternative. While the ACTC recognizes some potential benefits of this alternative, this alternative is not consistent with the RTP objectives. Because this alternative focuses exclusively on increasing roadway capacity in order to maintain adopted Level of Service standards, it would not sufficiently address the RTP's other Desired Outcomes such as optimizing community connectivity and enhancing safety. Further, the environmental, right-of-way, and community impacts that would likely result from this alternative would not be compatible with the Desired Outcomes to preserve or enhance the Region's community character and environment. Lastly, anticipated funding constraints would likely make this alternative infeasible to carry out, thereby conflicting with the Desired Outcome to ensure implementation of a feasible funding plan. For these reasons provided above, this alternative is rejected.

The No Project Alternative ranks last when compared to the environmentally superior alternative. This alternative is inferior to the other alternatives, and would not achieve the project objectives. The No Project Alternative would result in an infrastructure system not consistent with current growth and population projections for the County and its communities. For these reasons provided above, this alternative is rejected.

VII. STATEMENTS OF OVERRIDING CONSIDERATIONS RELATED TO THE 2015 AMADOR COUNTY RTP FINDINGS

As described in detail in Section III of these Findings, the following significant and unavoidable impacts could occur with implementation of the Project:

- Impact 3.2.1: Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment (cumulatively considerable and significant and unavoidable)
- Impact 3.4-1: Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (significant and unavoidable)
- Impact 4.2: Increased transportation greenhouse gas emissions may contribute to climate change (considerable contribution and significant and unavoidable)

The adverse effects listed above, and described in detail in Section III, are substantive issues of concern to the ACTC. However, the ACTC has developed a Regional Transportation Plan that emphasizes reductions in traffic congestion while improving human mobility, safety enhancements, community connectivity, socioeconomic growth that supports a sustainable broad-based economy, preservation and enhancement of community character and the environment, and ensures the implementation of a feasible funding plan, to preserve and enhance the existing countywide transportation system.

Based on the entire record and the EIR, the economic and social benefits of the Project throughout Amador County outweigh and override any significant unavoidable environmental effects that would result from future Project implementation as more fully described in Section III Findings and Recommendations Regarding Significant and Unavoidable Impacts. The ACTC Board has determined that any environmental detriment caused by the proposed project has been minimized to the extent feasible through the mitigation measures identified herein, and, where mitigation is not feasible, has been outweighed and counterbalanced by the significant transportation, environmental, and health and safety benefits throughout the region.