

**2024 Mono County Regional Transportation
Plan (RTP) update**

**Environmental Impact Report (EIR)
Addendum**

December 2024

Mono County Local Transportation Commission

I. INTRODUCTION

The proposed project is an update to the 2019 Regional Transportation Plan. An addendum to the Mono County General Plan Final Environmental Impact Report (SCH# 2014061029) is proposed for this project as allowed by Section 15164 (a) of the CEQA Guidelines:

- "(a) The Lead Agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred."

Section 15164 (a) of the CEQA Guidelines allows a lead agency to prepare an addendum to an EIR if only minor technical changes or additions are necessary or none of the conditions in Section 15162 calling for the preparation of a subsequent EIR have occurred. Section 15162 of the CEQA Guidelines require the preparation of a subsequent EIR for a project when an EIR has been certified for that project when the lead agency determines, on the basis of substantial evidence in the record, that one or more of the following has occurred:

- (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:
 - (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
 - (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
 - (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

II. PROJECT DESCRIPTION

This update to the Regional Transportation Plan (RTP) includes, but is not limited to, the following:

- Amendments and technical corrections and updates to ensure consistency with the 2024 Regional Transportation Plan Guidelines to the adopted 2015 RTP.
- Chapter 1 public participation;
- Chapter 2 existing transportation network, which was mainly a reorganization of information and technical clarifications/expansions of the existing network;
- Chapter 3 needs assessment, which mainly updated data and included additional detail about specific issues such as off-road vehicles, recreational vehicles, wildlife collisions, zero emission fuels, traffic speed in communities, multi-modal connections and some updates to environmental topics such as sage grouse, avalanche and other hazards;
- Chapter 4 regional policy element, which includes language to conform to the RTP Guidelines and minor/technical policy updates to reflect completed projects, clarifications, and the state of current issues.
- Chapter 5 community policy element, which includes policies specific to each community with the most changes made to the Antelope Valley policies to reflect the Mountain Gate planning project and multi-modal/traffic speed concerns, and Bridgeport Valley to reflect traffic speed and multi-modal concerns, as well as recent discussions about off-road vehicles and trail connectivity to adjacent communities and recreation destinations. Edits to other community policies reflect technical updates and concerns raised through recent community discussions and/or other projects ongoing within the community;
- Chapter 6 action element has been updated to reflect accomplishments since 2019, technical information and data updates, and consolidation of performance measures;
- Chapter 7 financial element reflects current potential funding sources.
- The appendices have been updated with current data and project lists. The 2015 Bikeway Plan and Trails Plan have not been updated this cycle, and the project lists have not been comprehensively updated. These updates are planned for a future RTP update cycle.

These amendments and technical corrections are not project specific. Specific projects are subject to future environmental reviews under the provisions of CEQA and/or NEPA. This RTP amendment updates 1) broad policies and objectives under Government Code § 65080 and federal mandates to provide a clear vision of regional transportation goals, policies, objectives and strategies, 2) provides an assessment of current transportation modes within the region, and 3) attempts to estimate future transportation needs, updates financial information and funding levels based on local revenues and allocations from the Federal / State Governments.

III. DECISION NOT TO PREPARE A SUBSEQUENT EIR

The CEQA Guidelines require the preparation of a subsequent EIR if one or more of several conditions are met; an addendum is required if none of the conditions requiring a subsequent EIR has occurred, but minor changes are necessary to the original EIR. The decision not to prepare a subsequent EIR for the adoption of the Mono County Housing Element Update was based on an

analysis of the conditions requiring a subsequent EIR and the determination that none of those conditions applied to this project, i.e.:

- (1) There are no substantial changes to the Regional Transportation Plan that will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

The data updates and revisions to policies and programs in the 2024 Update of the Regional Transportation Plan (RTP) do not impose any new significant environmental effects or increase the severity of identified effects. If anything, they reduce potential impacts by supporting zero emissions fuels, highlighting the need to consider sensitive habitat and species in project development, and promoting multi-modal connectivity to reduce greenhouse gas emissions. In addition, individual projects identified within the RTP will be covered by a project-level CEQA document at the time of project funding or implementation.

Therefore, no new impacts will result from the changes listed above in the RTP that were not already analyzed in the 2015 EIR.

- (2) There are no substantial changes with respect to the circumstances under which the project is undertaken that will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

Substantial changes with respect to circumstances have occurred since the 2015 EIR, including the listing of the Bi-State Sage Grouse and burrowing owl as candidate species under the California Endangered Species Act (CESA) and an update of the County's greenhouse gas emissions inventory and reduction targets. However, these changes in circumstances do not result in an increase in the severity of previously identified significant effects for the following reasons:

- *The data updates do not create or increase any environmental effects.*
- *The policy and program updates do not authorize construction and therefore do not create or increase any environmental effects. Future construction projects will need to be deemed consistent with the policies but will follow a separate authorization process which includes project-specific CEQA compliance.*
- *The County's updated 2022 Resource Efficiency Plan (REP), which is hereby incorporated by reference, maintains greenhouse gas emissions reduction targets that are consistent with the State's established targets, including AB 32, SB 97, Executive Order (EO) B-30-15, EO B-55-18, and SB 32. The REP is available online under "Supporting Documents" here: <https://www.monocounty.ca.gov/planning/page/studies>. The transportation policies incorporated into the RTP are identical to or consistent with the greenhouse gas emissions reduction plan set forth in the REP to meet the targets.*

- (3) There is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, that shows any of the following:

- (A) The project will have one or more significant effects not discussed in the previous EIR; or
- (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR; or

As discussed previously, the proposed update does not authorize construction nor create or increase any environmental effects. Therefore, significant effects previously examined will not be substantially more severe.

- (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

None of the mitigation measures or alternatives previously found to not be feasible have been found to be feasible now and the County has adopted all feasible mitigation measures. The RTP enhances previously adopted mitigation measures by increasing awareness and reducing impacts of/to potential impacts such as off-road vehicles, sensitive species and habitats, and greenhouse gas emissions.

- (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

There are no mitigation measures or alternatives associated with the updated policies and programs beyond those analyzed in the EIR that would substantially reduce impacts and, as discussed previously, no new impacts have been identified.

IV. CONCLUSION

Based on the considerations and analyses presented above and based on the provisions contained in CEQA §15164[a]) as presented in its entirety in this Addendum, it is concluded that none of the conditions calling for preparation of a subsequent EIR have occurred. The Mono County Local Transportation Commission, acting as Lead Agency, has therefore determined that this Addendum to the adopted 2015 Mono County General Plan EIR is the appropriate CEQA document for the proposed 2024 RTP update.

CEQA §15164(c-e) states that “an Addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration. The decision-making body shall consider the addendum with the final EIR or adopted negative declaration prior to making a decision on the project. A brief explanation of the decision not to prepare a subsequent EIR pursuant to §15162 shall be included in an addendum to an EIR, the lead agency’s findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.”