REPORT

DATE: March 1, 2007

TO: Regional Council

FROM: Jennifer Brost Sarnecki, AICP, Associate Planner, (213) 236-1829, sarnecki@scag.ca.gov

SUBJECT: Addendum to the 2004 Regional Transportation Plan Program Environmental Impact Report for the Administrative Amendment (Gap Analysis)

EXECUTIVE DIRECTOR'S APPROVAL:

RECOMMENDED ACTION:
Approve the attached Addendum to the 2004 RTP PEIR for the Administrative Amendment

BACKGROUND:
Staff is currently requesting approval of the environmental documentation conducted in compliance with Section 21166 of the Public Resources Code (CEQA) and CEQA Guidelines Sections 15162, 15163, and 15164 (Cal. Administrative Code, Title 14, Section 15000 et seq.). The Energy and Environment Committee considered approval of the Addendum to the 2004 Regional Transportation Plan (RTP) Program Environmental Impact Report (PEIR). The Transportation and Communications Committee considered approval of the Administrative Amendment to the 2004 RTP to bring it into compliance with the "Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users" (SAFETEA-LU) 23 U.S.C. 134 et seq.

When an EIR has been certified and the project is modified or otherwise changed after certification, additional review may be necessary pursuant to the California Environmental Quality Act (CEQA). The key considerations in determining the need and appropriate type of additional CEQA review are outlined in Section 21166 of the Public Resources Code (CEQA) and CEQA Guidelines Sections 15162, 15163 and 15164. SCAG staff determined an Addendum was the appropriate level of environmental review since the Administrative Amendment would not result in substantial changes to the project or new information which would require major revisions to the EIR.

The Addendum to the 2004 PEIR was prepared as part of SCAG's effort to bring the RTP into compliance with the planning requirements of SAFETEA-LU. The purpose of the Administrative Amendment is to identify and describe areas where the current RTP (and ancillary documents including the PEIR) either meets or exceeds the SAFETEA-LU requirements and areas where the current RTP is being supplemented to meet the requirements. The Environmental Division has provided supplementary documentation for environmental planning, mitigation, and consultation requirements.

SCAG conducted a programmatic environmental assessment of changes documented in the gap analysis pursuant to CEQA. SCAG found that adoption of the proposed amendments would not result in either new significant environmental effects or a substantial increase in the severity of previously identified significant effects. Specifically, the proposed changes as expressed in the amendment are not substantial changes, and

would therefore, not require major revisions to the 2004 PEIR. Further, SCAG found that the administrative amendment does not significantly affect the comparison of alternatives or the potential significant impacts previously disclosed in the 2004 PEIR.

SCAG has assessed the administrative amendment at the programmatic level, and found that it is consistent with the analysis, mitigation measures, air quality conformity, and Findings of Fact contained in the 2004 RTP PEIR. Therefore, it was determined that a subsequent or supplemental EIR was not required and the SAFETEA-LU Addendum to the 2004 PEIR fulfills the requirements of CEQA.

FISCAL IMPACT:
Preparation of the SAFETEA-LU Addendum to the 2004 PEIR is covered under the Environmental Planning Staff work element 07-020.SCGS1.

Reviewed by:

Division Manager

Reviewed by:

Department Director

Reviewed by:

Chief Financial Officer

ADDENDUM TO THE 2004 REGIONAL TRANSPORTATION PLAN (RTP) PROGRAM ENVIRONMENTAL IMPACT REPORT (PEIR)

SAFETEA-LU Compliance
Administrative Amendment (Gap Analysis) to the 2004 RTP

March 1, 2007

SOUTHERN CALIFORNIA
ASSOCIATION of GOVERNMENTS

Introduction

This document is an Addendum to the Final Program Environmental Impact Report ("PEIR") for the 2004 Regional Transportation Plan ("RTP" or "Plan"), prepared and certified by the Southern California Association of Governments ("SCAG") on April 1, 2004, and amended on February 2, 2006 and July 27, 2006.[1]

The project is the draft Administrative Amendment to the 2004 RTP to address the requirements of the "Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users" ("SAFETEA-LU") (Pub. L. No. 109-59, Title VI, Section 6001(a), 119 Stat. 1839; Aug. 10, 2005). The Administrative Amendment (previously referred to as the "Gap Analysis") is intended to bring the 2004 RTP into compliance with the planning requirements of SAFETEA-LU, which was enacted subsequent to SCAG's adoption of the 2004 RTP. SAFETEA-LU extends the RTP update cycle from three to four years for metropolitan planning areas that are designated as nonattainment or maintenance.

As the Lead Agency under the California Environmental Quality Act ("CEQA") (Cal. Pub. Res. Code Section 21000 et seq.), SCAG prepared the Final PEIR to evaluate the potential environmental impacts associated with implementation of the Plan. The Plan is a long-range program that addresses the transportation needs for the six-county SCAG Region through 2030. Although the Plan has a long-term time horizon under which projects are planned and proposed to be implemented, federal and state mandates ensure that the Plan is both flexible and responsive in the near term. Therefore, the Plan is regarded as both a long-term regional transportation blueprint and as a dynamic planning tool subject to ongoing refinement and modification.

The Plan includes both specific projects and strategies that address transportation and potential growth patterns. The purpose of the 2004 PEIR is to identify the potentially significant environmental impacts associated with the implementation of the projects, operations, programs, and policies included in the Plan. The 2004 PEIR serves as the informational document to inform decision-makers, agencies and the public of the potential environmental consequences of approving the 2004 RTP.

The 2004 PEIR focused on broad policy goals, alternatives and program-wide mitigation measures (*CEQA Guidelines* Section 15168(b)(4)).[2] As such, the 2004 PEIR is considered a first tier document that serves as a regional-scale environmental analysis and planning tool that can be used to support subsequent, site-specific project-level CEQA analyses.

Section 15152 of the *CEQA Guidelines* indicates that subsequent environmental analyses for separate, but related, future projects may tier off the analysis contained in the PEIR. The *CEQA Guidelines* do not require a Program EIR to specifically list all subsequent activities that may be within its scope. If site-specific EIRs or negative declarations will subsequently be prepared for specific projects broadly identified within a Program EIR, then site-specific analysis can be deferred until the project level environmental document is prepared (Sections 15168 and 15152) provided deferral

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[1] The Final 2004 Regional Transportation Plan Program Environmental Impact Report (SCH No. 2003061075) ("Final PEIR" or "2004 PEIR") is incorporated herein by this reference and an electronic version is available at http://scag.ca.gov/RTPpeir2004/draft/2004/responsecomments.htm

[2] Unless otherwise indicated, all citations by section number are to the *CEQA Guidelines* (Cal. Administrative Code, tit. 14, Section 15000 et seq.)

does not prevent adequate identification of significant effects of the planning approval at hand.

Basis for the Addendum

When an EIR has been certified and the project is modified or otherwise changed after certification, then additional CEQA review may be necessary. The key considerations in determining the need for and appropriate type of additional CEQA review are outlined in Section 21166 of the Public Resources Code (CEQA) and *CEQA Guidelines* Sections 15162, 15163 and 15164.

Section 21166 of CEQA specifically provides that a Subsequent or Supplemental EIR is not required unless the following occurs:

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

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

For the reasons set forth in this Addendum, SCAG has determined that an Addendum to the 2004 PEIR is the appropriate CEQA document because the proposed changes to the Plan do not meet the following conditions of Section 15162(a) for preparation of a Subsequent EIR:

(1) Substantial changes are proposed in the project which will require major revisions in the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
(2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
(3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence, at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:
    a. The project will have one or more significant effects not discussed in the previous EIR;
    b. Significant effects previously examined will be substantially more severe than shown in the previous EIR;

c. Mitigation measures or alternative previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

While the proposed changes to the RTP may represent "*New information of substantial importance...*" as stated in 15162(a)(3), these changes to the project will not result in one or more significant effects not discussed in the previous EIR, nor result in impacts that are substantially more severe than shown in the previous EIR. No changes to the mitigation measures contained in the 2004 PEIR are proposed.

The conditions described in CEQA section 15162 subdivision (a) have not occurred. As described in the project description section below, no programmatic, operational or project level impacts will result from the Administrative Amendment.

Project Description

An Administrative Amendment is proposed to bring the 2004 RTP into compliance with the planning requirements SAFETEA-LU. Prior to the adoption of SAFETEA-LU, SCAG was required to update the Regional Transportation Plan every three years. SAFETEA-LU extends the RTP update cycle for metropolitan planning organizations (MPOs) from every three years to every four years. The SCAG Regional Council (RC) adopted its RTP in April 2004 and under the new 4-year update provision, SCAG does not need to update its plan until early 2008 (provided that the 2004 RTP complies with SAFETEA-LU).

SAFETEA-LU establishes July 1, 2007 as the deadline by which State as well as MPO plans and programs must comply with these expanded planning requirements. The potential implication of not complying with this statutory deadline is that meaningful amendments to the existing plans and programs may not be allowed until an RTP and Regional Transportation Improvement Plan (RTIP) compliant with the provisions of SAFETEA-LU are in place. For a region as large and diverse as SCAG, this gap between the start of the SAFETEA-LU requirements in July 2007, and the projected date of an updated RTP in April 2008, could jeopardize timely delivery of projects worth billions of dollars. SCAG is thus preparing an Administrative Amendment to bring the current RTP into compliance with the planning provisions of the SAFETEA-LU prior to the July 1, 2007 deadline for full implementation of SAFETEA-LU.

The purpose of the Administrative Amendment is to identify and describe areas where the current RTP (and ancillary documents including the 2004 PEIR) either meets or exceeds the SAFETEA-LU requirements and areas where the current RTP is being supplemented to meet the requirements.

The Administrative Amendment does not include substantial changes to the programs, operations or projects included in the 2004 RTP. Rather, it provides documentation to supplement the RTP, where needed, and suggests additional studies/components for the RTP Update. In the categories where the RTP meets the SAFETEA-LU requirements, the findings from the RTP are restated. In areas where SCAG identified

potential "gaps," in the RTP, the Administrative Amendment includes a discussion on how the RTP currently addresses the category and suggests how the next RTP Update will address the new SAFETEA-LU requirements. The following description identifies the categories where SCAG augmented the RTP to address SAFETEA-LU.

1. METROPOLITAN AND STATEWIDE TRANSPORTATION PLANNING FACTORS

A. Safety

SAFETEA-LU added a new stand-alone planning factor to "increase the safety of the transportation system for motorized and non-motorized users." To address this gap, the Administrative Amendment describes the current safety portions of the RTP, including adopted policies and performance measures. For purposes of SCAG's modifications, safety is defined as "the protection of persons and property from unintentional damage or destruction caused by accidental or natural events."[3] The Administrative Amendment also summarizes the draft Strategic Highway Safety Plan (SHSP) developed by the California Department of Transportation (Caltrans) in September 2006. The SHSP guides safety activities within the State of California regarding all roadway users on all public roadways. Lastly, the Administrative Amendment states that SCAG will incorporate specific action items from the SHSP into the next RTP update.

B. Security

SAFETEA-LU added a new stand-alone planning factor to "increase the security of the transportation system for motorized and non-motorized users." For purposes of SCAG's modifications, security is defined as "the protection of persons or property from intentional damage or destruction caused by vandalism, criminal activity or terrorist attacks."[4] The Administrative Amendment summarizes the security projects in the RTP. It also describes SCAG's role in relation to planning for rail capacity, strategic routes in the event of a national emergency, seaports, airports, and international border crossings.

C. Environmental Factors

SAFETEA-LU expanded the environmental factor by adding the phrase "promote consistency of transportation plan and transportation improvements with State and local planned growth and economic development patterns." The Administrative Amendment reiterates the methodology for the RTP growth projections and subsequent environmental analysis. It also describes the consultation process undertaken during the 2004 PEIR planning process to ensure consistency with local plans and forecasts.

2. ENVIRONMENTAL MITIGATION

SAFETEA-LU requires metropolitan and statewide transportation plans to include a "discussion" of environmental mitigation activities. It further requires that this "discussion" shall be developed with Federal, State, and Tribal wildlife, land management, and regulatory agencies. The documentation provides a summary of the mitigation activities identified in the 2004 PEIR and the expanded consultation

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[3] National Cooperative Highway Research Program Report 525 Volume 3, "Incorporating Security into the Transportation Planning Process" Daniel Dornan and M. Patricia Maier, 2005.

[4] National Cooperative Highway Research Program Report 525 Volume 3, "Incorporating Security into the Transportation Planning Process" Daniel Dornan and M. Patricia Maier, 2005.

conducted by SCAG (See Administrative Amendment Appendix D: Expanded Consultation Conducted in October 2006).

3. CONSULTATION AND COOPERATION
SAFETEA-LU requires consultation with non-metropolitan local officials and Tribal governments in the development of the long-range statewide transportation plan and the State Transportation Improvement Program. SAFETEA-LU also requires that Metropolitan Planning Organizations (MPOs) and State Department of Transportations (DOTs) consult with local/State land use management, natural resource, historic and other agencies in the development of transportation plans. The RTP noticing procedures are described in the Administrative Amendment to the RTP. The documentation also describes the environmental workshops held in October 2006 to obtain input on mitigation for the next RTP cycle (See Administrative Amendment Appendix D: Expanded Consultation Conducted in October 2006).

4. TRANSPORTATION FACILITIES
SAFETEA-LU requires the inclusion of operations and management strategies in metropolitan transportation plans and long-range statewide transportation plans. The Administrative Amendment includes a summary of the operations and management strategies in the RTP. The work and the details of these investments will be reported in the next RTP update. No new facilities are described or proposed.

Analysis of Impacts

The Administrative Amendment to the RTP does not include substantial changes to the program, operations or projects included in the 2004 RTP.[5] Rather, it provides documentation to supplement the RTP (particularly in the area of safety and security) where needed, and suggests additional studies/components for the RTP Update. The Administrative Amendment does not go so far as to suggest new policies, procedures or projects. Therefore, the Administrative Amendment is not anticipated to result in substantial physical changes to the environment beyond those already anticipated and documented in the 2004 PEIR. Furthermore, no new impacts or mitigation measures are described or proposed.

Land Use

Potential impacts associated with the Administrative Amendment are consistent with the findings of the 2004 PEIR on land use. The 2004 PEIR analyzed potential impacts of the RTP on land use consistency and compatibility, including the loss and disturbance of agricultural land, open space, and recreational lands. The 2004 PEIR concluded that the RTP would result in significant impacts regarding the loss and disturbance of agricultural lands, the loss and disturbance of open space and/or recreational lands, and inconsistencies with general plans. The analysis in the 2004 PEIR (pp. 3.1-1- 3.1-20) adequately addressed impacts to the region that could result from implementation of the RTP at the program level. The Administrative Amendment represents a relatively minor modification to the entire Plan. Therefore, the supplemental documentation would not result in additional significant impacts beyond those identified in the 2004 PEIR.

[5] As stated on pages 24-25 of the administrative modification, operations include incident management, traffic control (e.g., ramp metering), traveler information, and operational strategies (i.e., physical improvements to help traffic flow and address bottlenecks).

Population, Housing, and Employment

Potential impacts from the Administrative Amendment are consistent with the findings for the 2004 PEIR. The 2004 PEIR found significant impacts would occur in the areas of growth distribution in vacant areas, displacement, community disruption, and a change in the regional growth pattern.

The Administrative Amendment would result in relatively minor impacts to population, housing, and employment. These impacts are within the range of impacts assessed at the programmatic level in the 2004 PEIR (pp. 3.2-12 – 3.2-16). Inclusion of the supplemental documentation into the RTP would not result in any additional significant impacts beyond those identified in the 2004 PEIR.

Transportation

The Administrative Amendment is not expected to cause significant adverse impacts on transportation. The 2004 PEIR utilized data from the 2030 transportation model output to determine a regional and cumulative level of analysis for the impacts of the RTP on transportation resources. The 2004 PEIR identifies four significant impacts from implementation of the RTP, including increased Vehicle Miles Traveled (VMT), higher average delay, increased heavy duty truck delay and a cumulatively considerable impact on counties outside the SCAG region. Analysis in the 2004 PEIR adequately addressed impacts that could result from the Administrative Amendment at the program level. Incorporation of the supplemental documentation into the RTP would not result in any additional significant impacts beyond those identified in the 2004 PEIR.

Air Quality

The Administrative Amendment is not expected to cause additional significant regional air quality impacts. The 2004 PEIR identified a significant and unavoidable impact on regional air quality, cancer risk increases, and short-term air emissions from implementation of the RTP. A less than significant impact was determined for regional emissions conformity. The RTP appendices contain detailed information on the financial analysis conducted for the conformity analysis, demonstrating the RTP's conformance with federal requirements for financial constraint.

The Administrative Amendment generally describes how the RTP complies with SAFETEA-LU, and provides additional information on safety and security. No new projects are proposed that would result in physical changes to the environment. As a result, the Administrative Amendment will not have impacts on regional air quality. Incorporation of the supplemental documentation into the RTP would not result in any additional significant impacts beyond those identified in the 2004 PEIR.

Noise

The Administrative Amendment is consistent with the findings of the 2004 PEIR on noise (pp. 3.5-14 – 3.5-28). The Administrative Amendment is not anticipated to result in direct construction or operational impacts and would not result in an increase in severity of previously identified significant noise impacts. Therefore, incorporation of the supplemental documentation into the RTP would not result in any additional significant noise impacts beyond those identified in the 2004 PEIR.

Aesthetics and Views

The Administrative Amendment is not expected to cause significant adverse impacts on aesthetics or views. The 2004 PEIR identifies significant impacts on aesthetics and views and a cumulative impact due to increased urbanization in the region (pp. 3.6-11 – 3.6-22). The RTP and 2004 PEIR included elements of the Administrative Amendment in general at a programmatic level. Incorporation of the supplemental documentation into the RTP would not result in any additional significant impacts beyond those identified in the 2004 PEIR.

Biological Resources

The Administrative Amendment is consistent with the findings of the 2004 PEIR on biological resources. The PEIR concluded that implementation of the RTP would adversely affect biological resources. (pp 3.7-20 – 3 7-33)

The Administrative Amendment generally describes procedural improvements and is not anticipated to result in physical impacts from construction or operation. Therefore, incorporation of supplemental documentation into the RTP would not result in any additional significant impacts to biological resources beyond those identified in the 2004 PEIR.

Cultural Resources

The Administrative Amendment is consistent with the findings of the 2004 PEIR on cultural resources. See pp. 3.8-18 - 3.8-24 of the 2004 PEIR. The analysis in the 2004 PEIR adequately addresses impacts that could result from the Administrative Amendment at the program level. The Administrative Amendment would not result in new or significant impacts to cultural resources. Therefore, incorporation of supplemental documentation into the RTP would not result in any additional significant impacts to cultural resources beyond those identified in the 2004 PEIR.

Geology, Soils and Seismicity

The Administrative Amendment is consistent with the findings of the 2004 RTP PEIR on geology, soil, and seismicity (pp. 3.9-16 – 3.9-22). The Administrative Amendment is not anticipated to result in new construction or operational impacts. Therefore, incorporation of the supplemental documentation to the 2004 RTP would not result in any additional significant impacts beyond those identified in the 2004 PEIR.

Hazardous Materials

The Administrative Amendment is consistent with the findings of the 2004 PEIR. The 2004 PEIR concluded that the RTP would facilitate the movement of goods, including hazardous materials, through the region (pp. 3.10-6 – 3.10-12). The analysis in the 2004 PEIR adequately addresses impacts that could result from the Administrative Amendment at the program level. Incorporation of the supplemental documentation into the RTP would not result in any additional significant impacts beyond those identified in the 2004 PEIR.

Energy

The Administrative Amendment is consistent with the findings of the 2004 PEIR. The 2004 PEIR concluded that significant impacts would result from an increase in transportation-related energy demands (pp. 3.11-12 – 3.11-16). The analysis in the 2004 PEIR adequately addresses impacts that could result from this project at the program level. Since the Administrative Amendment merely provides supplemental documentation to the RTP, it is not expected to cause significant energy impacts beyond those identified in the 2004 PEIR.

Water Resources

The Administrative Amendment is consistent with the findings of the 2004 PEIR on water resources. The 2004 PEIR identified an increase in impervious surfaces as a significant adverse impact (pp. 3-12-23 – 3.12-29). The analysis in the 2004 PEIR adequately addresses impacts that could result from the Administrative Amendment at the program level. Incorporation of the supplemental documentation into the RTP would not result in any additional significant impacts beyond those identified in the 2004 PEIR.

Public Services and Utilities

The Administrative Amendment is consistent with the findings of the 2004 PEIR for public services and utilities. See pp. 3.13-9 – 3.13-20 of the 2004 PEIR. The analysis in the 2004 PEIR adequately addresses impacts that could result from the Administrative Amendment at the program level. Incorporation of the supplemental documentation into the RTP would not result in any additional significant impacts beyond those identified in the 2004 PEIR.

Comparison of Alternatives

The Administrative Amendment, which includes supplemental documentation to the RTP, would not significantly affect the comparison of alternatives in the 2004 PEIR. The amendment is contemplated within the scope of the programmatic-level comparison among the alternatives considered in the 2004 PEIR: 1) No Project, 2) Modified 2001 RTP Alternative 3) The PILUT 1 (Infill) Alternative 4) The PILUT 2 (Fifth Ring) Alternative. The analysis in the Comparison of Alternatives chapter of the 2004 PEIR would not be significantly affected by the inclusion of supplemental documentation in the RTP. Therefore, no further comparison is required at the programmatic level.

Long Term Effects

The Administrative Amendment is within the scope of the discussion presented in the long-term effects chapter of the 2004 PEIR, which includes an assessment of programmatic level unavoidable impacts, irreversible impacts, growth inducing impacts, and cumulative impacts. Unavoidable and irreversible impacts from the inclusion of the supplemental documentation into the RTP are reasonably covered by the unavoidable and irreversible impacts previously discussed in the certified 2004 PEIR.

Any growth inducing impacts are expected to be approximately equivalent to those previously disclosed in the 2004 PEIR (pp. 5-1 – 5-14). Overall, the Administrative Amendment is within the scope of the broad, programmatic-level impacts identified and disclosed in the PEIR. Thus, the proposed supplemental documentation is consistent with the findings on long-term effects in the 2004 PEIR.

Conclusion

The proposed Administrative Amendment generally describes procedural improvements and is not anticipated to result in direct construction or operational impacts. Furthermore, the subsequent RTP Update will include more detail on the new areas and it will be fully assessed by SCAG in accordance with CEQA and all other applicable regulations, including SAFETEA-LU.

The RTP includes hundreds of projects; the Administrative Amendment represents a relatively minor modification to the entire Plan. Lastly, the Administrative Amendment will not have impacts on the fiscal constraint requirements, conformity, or environmental elements of the RTP.

After completing its' programmatic environmental assessment of these changes, SCAG finds that adoption of the proposed Administrative Amendment to the RTP would not result in either new significant environmental effects or a substantial increase in the severity of previously identified significant effects. The proposed changes as expressed in the Administrative Amendment, therefore, are not substantial changes which would require major revisions to the 2004 PEIR. Further, SCAG finds that the Administrative Amendment does not significantly affect the comparison of alternatives or the potential significant impacts previously disclosed in the 2004 PEIR. As such, SCAG has assessed the Administrative Amendment at the programmatic level, and finds that inclusion of this supplemental documentation is consistent with the analysis, mitigation measures and Findings of Fact contained in the 2004 PEIR. Therefore, a subsequent or supplemental EIR is not required and this SAFETEA-LU Addendum to the 2004 PEIR fulfills the requirements of CEQA.