Addendum No. 2 (North Sacramento Streams) to the Environmental Impact Report on the North Sacramento Streams, Sacramento River East Levee, Lower American River, and Related Flood Improvements Project

Prepared for:
Sacramento Area Flood Control Agency
March 2018
State Clearinghouse No. 2014052038

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EXHIBIT A
Addendum No. 2
(North Sacramento Streams) to the
Environmental Impact Report on the
North Sacramento Streams,
Sacramento River East Levee,
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Project

State Clearinghouse No. 2014052038

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1. Introduction

1.1 Background

This addendum to the Final Environmental Impact Report for the North Sacramento Streams, Sacramento River East Levee, Lower American River, and Related Flood Improvements Project (State Clearinghouse No. 2014052038), also referred to as the Levee Accreditation Project (LAP), addresses proposed modifications and refinements to the North Sacramento Streams levee improvements component of the LAP. These proposed modifications and refinements include changes to the timing of the construction, several adjusted staging areas, and modifications to haul truck and construction traffic routes, as described in more detail in Section 2, below.

1.2 Regulatory Context

If, after adoption of an EIR, altered conditions or changes or additions to a project occur, the State CEQA Guidelines provide three mechanisms to address these changes: a Subsequent EIR (Section 15162), a Supplemental EIR (Section 15163), or an Addendum (Section 15164).

State CEQA Guidelines Section 15162 describes the conditions when preparing a Subsequent EIR is appropriate. A Subsequent EIR is appropriate if the lead agency determines, on the basis of substantial evidence in light of the whole record, that one or more of the following conditions is met:

- Substantial changes are proposed in the project which 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 occur with respect to the circumstances under which the project is undertaken which 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; or
- 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 shows any of the following:
  - The project will have one or more significant effects not discussed in the previous EIR;
  - Significant effects previously examined will be substantially more severe than shown in the previous EIR;
  - 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
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.

Section 15164 of the State CEQA Guidelines states that a lead agency may prepare an Addendum to a certified EIR if some changes or additions are necessary but none of the conditions described above in Section 15162 calling for the preparation of a Subsequent EIR have occurred.

The analysis in Section 3 demonstrates that the proposed modifications and refinements to the Project:

- would not result in any new significant environmental effects, and
- would not substantially increase the intensity or severity of previously identified effects.

In addition, no new information of substantial importance has arisen that shows that:

- the Project would have new significant effects,
- the Project would have substantially more intense or severe effects,
- mitigation measures previously found to be infeasible would in fact be feasible, or
- mitigation measures that are considerably different from those analyzed in the EIR would substantially reduce one or more significant effects on the physical environment.

Because none of the conditions described in Section 15162 of the State CEQA Guidelines calling for preparation of a Subsequent EIR have occurred, an Addendum to the EIR, consistent with Section 15164 of the State CEQA Guidelines, is the appropriate CEQA document to evaluate the proposed modifications and refinements to the Project and substantiate that none of the conditions described in Section 15162 have occurred.

### 2. Modifications and Refinements to the Project

#### 2.1 Minor Project Refinements with No Environmental Impacts

The following minor Project refinements would result in no new environmental impacts and would not increase the severity or intensity of impacts previously evaluated in the EIR, and therefore are not evaluated further in this Addendum:

- Changes to the year in which Project-related construction would begin and end, and details as to the timing of the different types of construction.
Identification of details related to traffic controls on specific roadways, which were previously required in mitigation measures adopted in the Mitigation, Monitoring, and Reporting Program (MMRP) for the EIR.

2.2 Project Refinements Evaluated in Detail

2.2.1 Construction Traffic

Since SAFCA’s certification of the EIR in 2016, design refinements have resulted in changes to the construction traffic patterns from those identified in the EIR.

Empty haul trucks (up to an estimated 80 per day, or maximum of 15 trucks per hour) would travel down Pamela Drive and Arcade Boulevard to Rio Linda Boulevard (see Figure 1). This activity would occur for approximately 30 days in May and June, approximately 30 days in July and August, and with a lower level of activity (an estimated 30-40 trips per day) over 15 days during September and October, for an estimated 75 days. Arcade Boulevard was identified as a potential truck route in the EIR, and Rio Linda Boulevard was identified as a potential truck route in the North Sacramento Streams Addendum No. 1 (prepared in December 2016). Pamela Drive was not previously identified as a truck route.

2.2.2 Staging Areas

Several additional staging areas have been identified as the design has been refined. New staging areas not previously identified in the EIR are illustrated on Figure 1 and consist of:

- Areas on the waterside toe of the Natomas East Main Drainage Canal (NEMDC) East Levee immediately north and south of the El Camino Avenue bridge sites (Sites A and B).
- Areas on the waterside toe of the NEMDC East Levee immediately north and south of Arcade Creek (Sites C and D).

These areas would potentially be used for staging activities described in the EIR. At Sites A and B, material would be stockpiled after stripping organic material from the ground surface. At Sites C and D, the potential uses include slurry mixing areas, constructed by stripping organic material, then constructing berms above the existing grade to contain the slurry. All staging areas would be returned to pre-project conditions after work is completed.

2.2.3 Haul Route and Temporary Stream Crossings

Modifications to the haul route consist of:

- adjustments to stream crossing locations at Arcade Creek (crossing proposed to be moved slightly eastward) and the NEMDC crossing just north of El Camino Avenue (crossing proposed to be moved south); and
- addition of up to 13 turnouts along the haul route.

All haul route modifications would be within the existing footprint identified in the EIR. Each turnout would be up to 150 feet long, and would generally widen the haul route by 20 feet on each side of the haul road. Figure 1 illustrates proposed turnout locations and temporary stream crossing modifications.
3. Environmental Analysis

This section of the Addendum analyzes the potential effects on the physical environment from implementation of the proposed modifications and refinements to the Project. This analysis has been prepared to determine whether any of the conditions in State CEQA Guidelines Section 15162 (described in Section 1.2) would occur as a result of the proposed modifications and refinements.

The proposed Project modifications and refinements would not cause any new significant impacts or a substantial increase in the severity or intensity of the impacts analyzed and disclosed in the EIR for the following topic areas because the activities associated with the proposed modifications and refinements would already occur under the approved Project, were analyzed in the prior EIR, would occur within the previous Project footprint, and would not substantially increase in magnitude:

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Geology and Soils
- Geomorphology
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Land Use and Planning
- Mineral Resources
- Utilities and Service Systems

The following topic areas may be affected by the proposed modifications and refinements to the Project and therefore are analyzed below.

3.1 Aquatic and Terrestrial Biological Resources

Turnouts along the haul route of the waterside toe of the NEMDC West Levee and NEMDC East Levee would be restricted to upland area, and would not encroach in wetland habitat. Slurry ponds would be excavated in new staging areas C and/or D. The use of the new staging area C would result in up to 0.15 acre of temporary impacts to seasonal wetland habitat associated with the modified stream crossing and the use of the area for staging or slurry pond. Pre-construction contours would be restored once the Project is complete. Therefore, the impacts to wetland habitat are temporary and would have a less-than-significant impact on wetland habitats, including those regulated under Section 404 of the Clean Water Act and Section 1600 of the California Fish and Game Code. Wetlands are not present within the proposed stockpiling areas A, B, or D, and therefore no impacts to sensitive aquatic habitats would occur.

Modification of the haul route at the confluence of Arcade Creek near NEMDC/Steelhead Creek, and at NEMDC/Steelhead Creek north of West El Camino Avenue could result in the need to trim or remove additional riparian vegetation. It is anticipated that up to four trees may require removal. Addendum No. 1 identified up to 49 trees would be removed to accommodate construction, access, and haul routes. Tree
Figure 1. Overview Map

Source: GEI Consultants, Inc., 2018
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removal conducted in winter 2017 resulted in the removal of 35 trees; 14 trees previously identified for removal would remain on the landscape. Mitigation plantings were installed in January 2018 to compensate for the loss of 49 trees associated with Project construction. The removal of up to four trees would not result in any new or substantially greater impacts related to biological resources than what was already disclosed. No further mitigation is required.

### 3.2 Cultural and Paleontological Resources

#### 3.2.1 Cultural Resources

SAFCA’s December 2016 “Addendum Number 1 (North Sacramento Streams) to the Environmental Impact Report for North Sacramento Streams, Sacramento River East Levee, Lower American River, and Related Flood Improvements Project.” contains a detailed summary of cultural resources records searches, pedestrian survey, geoarchaeological test excavations, and Native American consultation associated with the North Sacramento Streams Project.

As a result of the records searches, Native American consultation, pedestrian field survey, and geoarchaeological test excavations, no known prehistoric or historical archaeological sites have been identified in the levee improvement areas. Proposed levee improvements would, therefore, have no adverse effect on known archaeological historic properties under Section 106 of the National Historic Preservation Act (NHPA). The California State Historic Preservation Officer (SHPO) concurred with these findings in a letter dated September 23, 2016 (California State Parks 2016).

The North Sacramento Streams levee improvement components have little or no potential to affect buried archaeological resources in the vicinity of proposed staging areas A, B, C, and D or the proposed stream crossing locations.

Resource NEMDC East Levee (no assigned number) is an approximately 1,700-foot-long portion of the NEMDC/Steelhead Creek East Levee. This resource has been evaluated by a GEI architectural historian and has been recommended as eligible for listing on the National Register of Historic Places under Criterion A. When originally constructed, the levee was designed to be periodically maintained and strengthened, which was the purpose of the Sacramento River Flood Control Project as stated above. The Project modifications, including turnouts and staging locations, would not result in permanent changes to the character-defining features, the integrity of the levee which include its overall design and form, or the materials, workmanship, and general physical characteristics that convey the historical significance of the levee. The levee would continue to serve its intended purpose within the context of flood control. The Environmental Assessment for Section 404 and 408 Permission for the North Sacramento Streams Levee Accreditation Project (U.S. Army Corps of Engineers 2016) found that implementation of the North Sacramento Streams levee improvements would not adversely affect the NEMDC East Levee under Section 106 of the NHPA and therefore the impact was determined to be less than significant. The California SHPO concurred with these findings in a letter dated September 23, 2016 (California State Parks 2016). For the reasons discussed above, the impact on the NEMDC East Levee historical architectural resource from proposed Project modifications contemplated in this Addendum (turnouts and staging areas) would also be less than significant.

The North Sacramento Streams Project vicinity (but not within the Project area) is known to have contained documented significant prehistoric archaeological sites, including sites with human burials. Based on the intensity of documented prehistoric use, known early Native American occupation of the North Sacramento Streams Project area, and the presence of human remains in previously identified
sites in the North Sacramento Streams Project vicinity, it is possible that Native American human remains could be encountered during construction associated with North Sacramento Streams levee improvements. Although no human remains were identified during subsurface exploration, it is possible that presently unknown human remains could be encountered during earthmoving activities. Therefore, the EIR determined that the North Sacramento Streams levee improvements component of the LAP could have a potentially significant impact. Implementing Mitigation Measure CR-4a: Prepare and Implement a Native American Burial Discovery and Treatment Plan, and Mitigation Measure CR-4b: Implement Procedures for Inadvertent Discovery of Human Remains, which were previously adopted and incorporated into the LAP, would reduce the potentially significant impact on cultural resources to a less-than-significant level. These mitigation measures apply to all earthmoving activities at all locations where North Sacramento Streams levee improvements would be constructed, including the proposed Project modifications described in this Addendum. Therefore, for all of the reasons discussed above, the proposed Project modifications would not result in any new or substantially greater impacts related to cultural resources. No further mitigation is required.

3.2.2 Paleontological Resources

Based on a review of geologic mapping prepared by Wagner et al. 1987, Project-related earthmoving activities that are proposed at new staging areas A and B (where materials would be stockpiled), staging areas C and D (where slurry mixing ponds would be excavated), and the locations where adjustments would be made to proposed stream crossings, would occur in Holocene-age Basin Deposits. Scraping of organic material prior to stockpiling, excavation for the slurry mixing ponds, and construction of the proposed stream crossings would not extend to sufficient depths to encounter the paleontologically sensitive Riverbank Formation, which is of Pleistocene age. Holocene deposits contain only the remains of extant, modern taxa (if any resources are present), which are not considered “unique” paleontological resources. Therefore, the Basin Deposits are considered to be of low paleontological sensitivity and earthmoving activities associated with the four new staging areas and the two adjusted stream crossings would have a less-than-significant impact on unique paleontological resources. No mitigation is required.

3.3 Noise

The proposed modifications include use of public roadways (i.e., Arcade Boulevard and Pamela Drive) for circulation of empty haul trucks to permit truck operations on the levees with one-way traffic.

The 2016 EIR found construction traffic noise to be a significant impact of the North Sacramento Streams levee improvements component of the LAP, increasing noise levels up to 8 decibels over existing levels based on the addition of up to 55 construction haul trucks per hour. Because the proposed modifications would result in fewer trips (up to 15 empty haul truck trips per hour) to public roadways than the number of truck trips considered in the 2016 EIR, the proposed modifications would not substantially increase the severity or intensity of the construction and construction traffic noise impacts identified in Impact NOI-1 and Impact NOI-3 in the 2016 EIR. Implementing Mitigation Measure NOI-1 (Implement Measures to Reduce Construction Noise Effects), which were previously adopted and incorporated into the LAP, would further reduce these impacts. No further mitigation is required.

3.4 Recreation

One of the adjusted stream crossings and proposed staging areas A and B, where materials would be stockpiled, would be located approximately 225 feet west of Redwood Park. The other adjusted stream
crossing and proposed staging areas C and D, where materials would be stockpiled and bentonite slurry mixing ponds would be used, would be located approximately 380 feet northeast of Gardenland Park and approximately 700 feet northwest of Johnston Park. Potential impacts to several City of Sacramento Parks, including Redwood Park and Johnston Park, were identified in the EIR. As a result of the additional proposed staging areas, Gardenland Park would also be affected by Project-related activities. These three parks would not require closure during Project-related construction activities (including the adjusted stream crossings) or from use of proposed staging areas A, B, C, and D. However, as discussed in EIR Impact REC-1 (Temporary and Short-term Changes in Recreational Opportunities during Project Construction Activities), the quality of recreational opportunities in the vicinity of these parks would likely be somewhat reduced, temporarily, as a result of noise, dust, and visual disturbance. Construction impacts would be temporary and short-term in nature and the degradation of the quality of recreational experiences would last for only one construction season. Recreationists may use nearby recreational facilities in the vicinity of Arcade Creek that provide similar amenities, such as Gateway Park, Hagginwood Park, Nuevo Park, and Richardson Village Park.

The Project-related modifications discussed in this Addendum would not substantially increase the severity or intensity of the recreation impacts already identified in the EIR. Implementing Mitigation Measures REC-1a (Prepare and Implement a Bicycle Detour Plan for all Bike Trails and On-Street Bicycle Routes, Provide Construction Period Information on Bicycle Facility Closures, and Coordinate with the City of Sacramento and/or Sacramento County Department of Parks and Recreation to Allow Repair of Damage to Bicycle Facilities), REC-1b (Prepare and Implement a Recreation Plan for all Recreation Facilities, Provide Construction Period Information on Recreation Facility Closures, and Coordinate with the City of Sacramento Department of Parks and Recreation and California Department of Parks and Recreation to Repair Damage to Recreational Facilities), and TR-3a (Provide Advance Notice of Bicycle and Pedestrian Facility Closures and Detour Routes), which were previously adopted and incorporated into the LAP, would reduce these impacts to a less-than-significant level. No additional mitigation is necessary.

3.5 Transportation and Traffic

The use of Pamela Drive by empty haul trucks after the trucks have dropped loads at staging and work areas along Arcade Creek would facilitate truck traffic from the levee to Arcade Boulevard and thence to Rio Linda Boulevard. No additional trucks trips would occur beyond those analyzed in the EIR; rather, some of the trucks (up to 80 trips per day) would be re-routed from the top of the levee and onto these three surface streets in order to improve access and increase the speed of work at the Project site. Pamela Drive currently carries cars and occasional light-duty commercial trucks (i.e., service vehicles). The adjustments to stream crossing locations and the modified turnouts would also improve the efficiency of haul truck circulation, but would not affect traffic and transportation as analyzed in the EIR. The proposed additional staging areas A, B, C, and D would not affect traffic and transportation as analyzed in the EIR. The two proposed modified stream crossing locations would facilitate haul truck transportation along the levee crowns; because the stream crossings would not be located on public roadways, they would have no effect on traffic and transportation as analyzed in the EIR.

The analysis in the EIR used a recommended screening criterion from the Institute of Transportation Engineers for assessing the effects of construction projects that create temporary traffic increases. To account for the large percentage of heavy trucks associated with typical construction projects, the EIR used a threshold of 50 or more new peak-direction trips during the peak-hour. The proposed modifications would cause an increase of up to 80 trucks per day (15 trips during the peak hour) on
Pamela Drive, Arcade Boulevard, and Rio Linda Boulevard. Therefore, these proposed modifications would not result in 50 or more new peak direction trips during the peak hour.

Although these modifications would increase the number of trucks using public roadways, the total truck trips per day that would result from the proposed modifications would not exceed the threshold of 50 trips per hour on these roadways, and would not substantially increase the severity or intensity of the transportation and traffic impacts already identified in the EIR, including Impact TR-1 (Increase in Traffic Volumes along Designated Roadways in the Project Study Area), Impact TR-2 (Potential for Increased Emergency Response Times or Inadequate Emergency Access), Impact TR-3 (Decreased Performance or Safety of Alternative Modes of Transportation), or Impact TR-4 (Increased Hazards Due to a Design Feature or Incompatible Uses). Implementing Mitigation Measures TR-1 (Prepare and Implement a Traffic Control and Road Maintenance Plan) and TR-2 (Provide Pre-Notification of Road Closures and Detours to Emergency Service Providers, and Maintain Emergency Access), which were previously adopted and incorporated into the LAP, would reduce these impacts to a less-than-significant level. No additional mitigation is necessary.

3.6 Water Quality and Groundwater Resources

At proposed staging areas A and B, along the NEMDC at West El Camino Avenue, organic matter would be removed from the ground surface and materials would be stockpiled. Proposed staging areas C and D, along the NEMDC at its intersection with Arcade Creek, would entail excavation and use of shallow slurry ponds in addition to materials stockpiling. To construct the ponds, organic material would be removed, and soil material from shallow excavations would be used to create berms. The ponds would be used to mix the bentonite slurry necessary for the levee cutoff walls.

As discussed in the LAP EIR, on October 15, 2007, the California Department of Water Resources entered into an agreement with the Central Valley Regional Water Quality Control Board describing acceptable means of treatment and disposal of investigation-derived material (IDM). The agreement also describes acceptable means of disposal for drilling fluid and wet cuttings containing bentonite, as listed below:

- IDM not containing bentonite (i.e., dry cuttings) may be broadcast on the landside of the levee slope at least 100 feet from any water feature, including dry ditches, wet ditches, streams, ponds, vernal pools, and wetland areas.

- IDM containing bentonite will not be discharged to the ground surface without a means of containment (i.e., settling basin), or will be containerized on site. All bentonite that contains IDM will be disposed of at an approved landfill facility or deposited at an approved settling basin.

The LAP EIR stated that a Bentonite Slurry Spill Contingency Plan (BSSCP) would be developed for activities that involve the use of bentonite materials (e.g., the construction of slurry walls and use of slurry mixing ponds). The BSSCP is intended to minimize the potential for accidental release of bentonite (which is used in excavation and tunneling activities), provide for timely detection of accidental bentonite release, and ensure a “minimum-effect” response in the event of an accidental bentonite release. The LAP EIR also stated that a Spill Prevention Control and Countermeasures Plan would be developed to prevent discharge of petroleum products into navigable water or adjoining shorelines.
Possible temporary and short-term significant impacts on water quality could occur at proposed staging areas A, B, C, and D, as well as at the two proposed adjusted stream crossings, from stormwater runoff, sediment erosion, and spills of bentonite, fuels, lubricants, hydraulic fluids, and coolants, all of which could directly affect the water quality of the NEMDC and downstream waterbodies and can be toxic to fish and other aquatic organisms. However, the Project modifications discussed in this Addendum would not substantially increase the severity or intensity of the water quality impacts already identified in the EIR, including Impact WQ-1 (Possible Temporary and Short-term Impacts on Water Quality from Stormwater Runoff, Erosion, and Spills Associated with Construction) and Impact WQ-3 (Possible Temporary Effects on Groundwater or Surface Water Quality Resulting from Contact with the Water Table during Construction). Implementing Mitigation Measures GEO-1 (Acquire Appropriate Regulatory Permits and Prepare and Implement a Storm Water Pollution Prevention Plan and Associated Best Management Practices), GM-1 (Implement Conservation Strategy Measures to Reduce Erosion and Sediment Transport), HAZ-1 (Implement Conservation Strategy Measures such as a Spill Prevention and Control Plan to Reduce the Potential for Environmental Contamination during Construction Activities), and WQ-3 (Obtain Appropriate Discharge and Dewatering Permit and Implement Provisions for Dewatering), which were previously adopted and incorporated into the LAP, would reduce these impacts to a less-than-significant level. No additional mitigation is necessary.

4. Conclusions

As described in the preceding sections, the proposed modifications and refinements to the Project do not require any revisions to the EIR because new or substantially more severe or intense significant environmental impacts would not occur and other State CEQA Guidelines Section 15162 thresholds would not be triggered.

Based on the analysis in Section 3, “Environmental Analysis,” the proposed modifications and refinements to the Project as described in this Addendum would not result in any of the conditions described in Section 15162 of the State CEQA Guidelines calling for preparation of a Subsequent EIR or Supplemental EIR. In summary, the proposed modifications and refinements to the Project:

- would not result in any new significant environmental effects,
- would not substantially increase the intensity or severity of previously identified effects,
- would not result in mitigation measures or alternatives previously found to be infeasible becoming feasible, or
- would not result in availability/implementation of mitigation measures or alternatives that are considerably different from those analyzed in the previous document that would substantially reduce one or more significant effects on the physical environment.

These conclusions confirm that a Subsequent or Supplemental EIR is not required, and this Addendum to the EIR pursuant to State CEQA Guidelines Section 15164 is the appropriate CEQA document to evaluate and record the modifications and refinements to the Project, and resulting impacts thereof. No changes are needed to the certified EIR or the adopted MMRP for the Project.