

Addendum
to the
Environmental Impact Report

For the
West Davis Active Adult Community Project

SCH No.: 2017042043

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1. INTRODUCTION

This Addendum to the environmental impact report (EIR) for the West Davis Active Adult Community (Project), located largely in an undeveloped area within the City of Davis (City), has been prepared to fulfill all requirements of the California Environmental Quality Act (CEQA) for review of project changes following certification of an EIR for a project. This document was preliminarily drafted by the Project Applicant/Developer in consultation with environmental consultants listed in reports, studies, and other communications included as appendices to this Addendum, as well as environmental professionals at Remy Moose and Manley, LLP, pursuant to CEQA Guidelines section 15084(c). The City in its role as lead agency reviewed and modified the preliminary draft to ensure this Addendum reflects the City's independent judgment and will consider it along with the certified EIR prior to making future decisions on the Project (CEQA Guidelines §§ 15084(e), 15164(c-d)).

This Addendum incorporates references in footnotes and is organized as follows:

- Section 1, Introduction
- Section 2, Description of Modified Project Components
- Section 3, Environmental Analysis and Checklist
- Appendices

1.1 Basis for the Addendum

This Addendum has been prepared pursuant to CEQA Guidelines section 15164 as prescribed by the Legislature in Public Resources Code (PRC) sections 21083 and as allowable under PRC section 21166.¹ An addendum is an appropriate subsequent document to a previously certified EIR when the conditions for a subsequent or supplemental EIR are not present (CEQA Guidelines § 15164). A subsequent or supplemental EIR is only required when substantial changes to a project require major revisions of a previous EIR due to new or increased substantial environmental impacts, or where new information of substantial importance has been uncovered that indicates the project would create new impacts or increase the severity of existing impacts (CEQA Guidelines §§ 15162(a), 15164(a)).

As described in more detail in Section 2, the Project requires some storm drainage system modifications, which trigger the need for both ministerial and discretionary entitlements and approvals (permits) from the City of Davis (City) and Yolo County (County).² Substantial evidence presented in this Addendum demonstrates that modified Project components do not create any new substantial impacts or increase the severity of previously-identified significant impacts, as detailed in Section 3, Environmental Analysis (CEQA Guidelines § 15162(a)).

¹ The validity of addenda as a tool for subsequent review in CEQA was affirmed by the Fourth District California Court of Appeal in *Save Our Heritage Organisation v. City of San Diego* (2018) 28 Cal.App.5th 656, 668.

² The permits that may be required by the County for the modified Project components include both discretionary and ministerial permits. Discretionary permits are subject to CEQA while ministerial permits are not. *See* CEQA Guidelines § 15268 and Section 2.3.

Further, since certification of the previous EIR on June 19, 2018 (approximately 18 months ago), circumstances surrounding the Project and its location have not substantially changed nor has any new information of substantial importance come to light that indicates the Project would create new significant impacts or increase the severity of previously-identified impacts (CEQA Guidelines § 15162(a)). No new projects have been approved or proposed within the Project’s vicinity, and the City is not aware of any other new information that might bear relevance on the Project’s CEQA analysis. Therefore, no evidence exists that indicates a subsequent EIR should be prepared, and an addendum is therefore the appropriate CEQA document for the modified Project components that are proposed. (Ibid, §§ 15162(a), 15164(e)).

Also since certification of the previous EIR, the CEQA Guidelines have been updated and revised by the Governor’s Office of Planning and Research, finalized by the California Natural Resources Agency, approved by the Office of Administrative Law, and filed with the Secretary of State, effective December 28, 2018 (2018 CEQA Guidelines Update).³ As part of this effort, some areas of impact analysis within CEQA Guidelines Appendix G Checklist were revised and new ones were added. These revised and new areas of impact not considered in the previously certified EIR are assessed in this Addendum in good faith to provide the most updated information to decision makers.⁴ However, these areas do not constitute new information under CEQA, nor are they required to be included in this Addendum.⁵

1.2 Background

General background information on the Project and environmental review process are found on page 2.0-2 of the Draft EIR (DEIR) and pages 1.0-2 to -3 of the Final EIR (FEIR).⁶ After the public comment period and preparation of the FEIR with responses to comments in April 2018, the EIR was considered by the City of Davis Planning Commission on April 11, 2018. During a public hearing, the Commission voted 7-0 to recommend that the Davis City Council certify the document as adequate, and 5-2 to recommend that the City Council approve the General Plan amendment that is included as part of the Project (see Section 2). On May 29, 2018, the City Council held a public hearing on the EIR and Project components and received comments from the Developer, public agencies, and members of the public. On June 12, 2018, the City Council certified the FEIR and adopted Resolution No. 18-093 that approved EIR findings and overriding considerations, Resolution No. 18-094 that approved the General Plan amendment, and Resolution No. 18-095 that called for a special election for qualified City voters to vote on the Project pursuant to Measure R. Thereafter on June 22, 2019, the City Council adopted Ordinance No. 2533 that rezoned the Project Site from Yolo County Agricultural to Preliminary Planned Development and Ordinance No. 2534 that approved a development agreement between the City

³ See Senate Bill 743 (2018).

⁴ See PRC §§ 21002.1(e), 210065; CEQA Guidelines §§ 15002(a)(1), 15003(c).

⁵ See *Cleveland National Forest Foundation v. San Diego Assn. of Governments* (2017) 17 Cal.App.5th 413, 426 [“once in EIR is finally approved, a court generally cannot...compel an agency to perform further environmental review if new regulations or guidelines for evaluating the project’s impacts are adopted in the future”]; *Citizens Against Airport Pollution v. City of San Jose* (2014) 227 Cal.App.4th 788, 808 [CEQA Guidelines enacted after an EIR is certified are not “new information within the meaning of [PRC] section 21166, subdivision (c)” and therefore do not trigger preparation of a subsequent EIR nor require consideration in an addendum].

⁶ Project information also is found on the City’s website as an approved development project (available online at <https://www.cityofdavis.org/city-hall/community-development-and-sustainability/development-projects>).

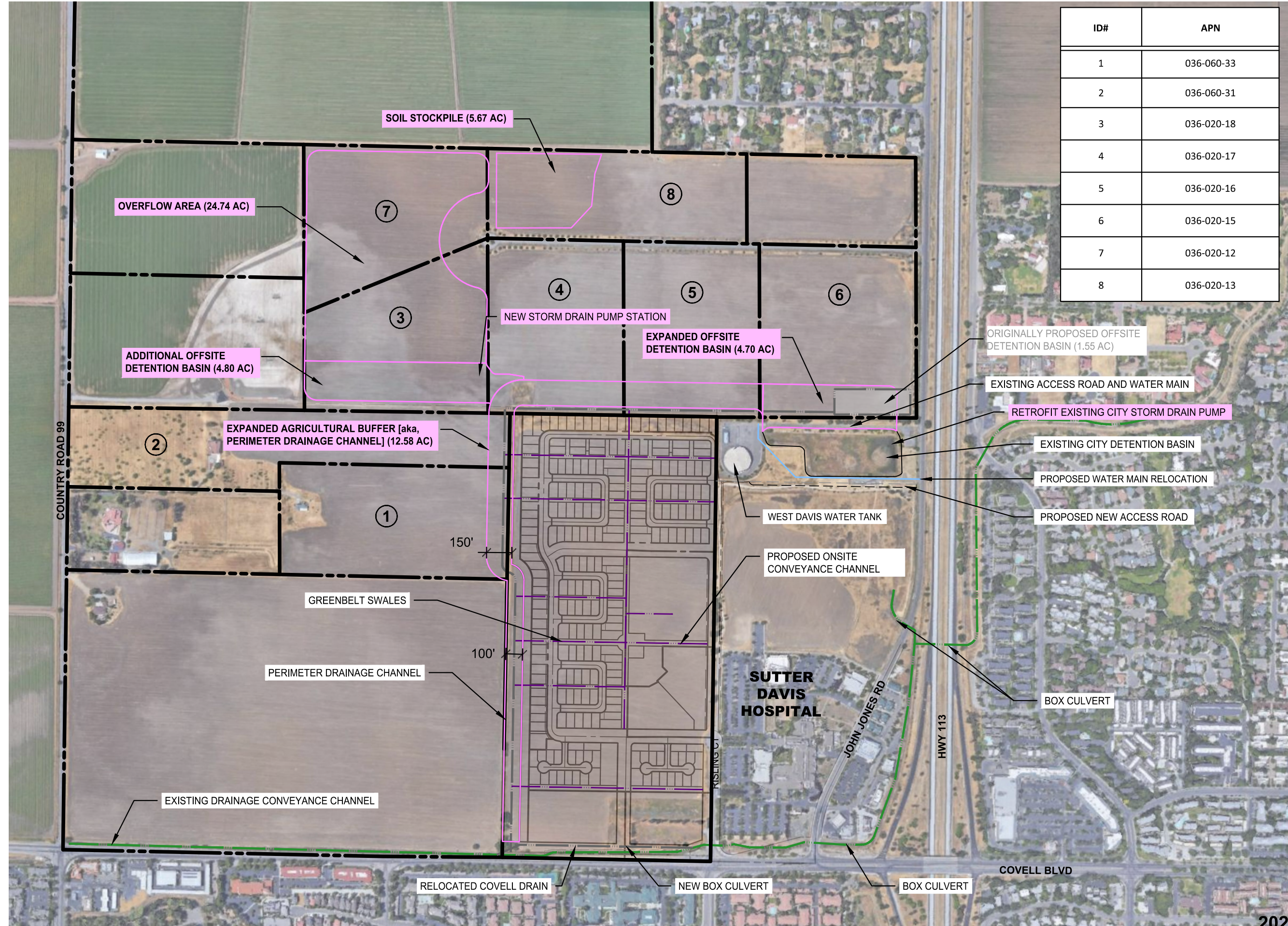
and Applicant/Developer. On November 6, 2018, City voters approved the General Plan amendment and its baseline features, and on June 22, 2019, the annexation became effective. On July 10, 2019, the City approved the tentative large lot subdivision map for the Project based on the previously certified EIR. Throughout this process, the Applicant/Developer has implemented several mitigation measures required in the previously certified EIR's Final Mitigation Monitoring and Reporting Program (MMRP) (see Section 3 for more detail).

After Project approval by City voters and annexation to the City, the Applicant/Developer began final layout and design of the Project's storm drainage system as explicitly prescribed in the previously certified EIR and to ensure compliance with current City and County standards (see DEIR, pp. 2.0-11; 3.9-17 and 3.9-22). As part of this final layout and design and to comply with Mitigation Measures (MMs) 3.9-2 through 3.9-5, the Applicant/Developer conducted design-level hydrological modeling to ascertain stormwater runoff during extreme storm events, such as 100-year storm events (DEIR, pp. 3.9-19, 24–25). This modeling also was necessary to obtain a Federal Emergency Management Agency (FEMA) conditional letter of map revision (CLOMR), which is desired because the Project lies within a 100-year flood plain (see Appendix A, FEMA CLOMR Request [06-17-2019]). Based on this modeling that used conservative assumptions, and to satisfy City and County requirements as community participants in the CLOMR process, it was determined that the originally proposed offsite detention basin and perimeter drainage channel should be moderately expanded and an additional offsite detention basin created with adjoining 100-year storm event overflow area to ensure avoidance of potential environmental impacts associated with extreme storm events. Refer to Hydrology and Water Quality in Section 3 for more technical detail and Section 2.2 for a description of these modified Project components.

2. DESCRIPTION OF MODIFIED PROJECT COMPONENTS

2.1 Project Description in Previously Certified EIR

The Project is described in detail in Chapter 2.0, Project Description, of the DEIR, including a Project overview; a description of Project characteristics and components; and a General Plan amendment and annexation (DEIR, pp. 2.0-1–38). The DEIR includes several figures showing Project location and details (Id., pp. 2.0-15–37). The project site where residential development would occur as originally proposed is located within the City limits on parcel number 036-060-05 (Id., p. 2.0-1; see pp. 2.0-15, -17, and -19 for location and parcel figures). New portions of the project as modified (the revised drainage system, discussed below) are located within unincorporated parts of the County (see Figure 2-1).



COUNTRY ROAD 99

SUTTER DAVIS HOSPITAL

JOHN JONES RD

HWY 113

COVELL BLVD



**MODIFIED PROJECT COMPONENTS,
 ADDENDUM TO WEST DAVIS ACTIVE ADULT COMMUNITY PROJECT EIR**
 CALIFORNIA
 DAVIS

In brief, the approved Project consists of up to 560 dwelling units, 4.3 acres of mixed-use facilities, a 3-acre age restricted senior care facility, various open space and infrastructure, and 4.5 miles of onsite biking and walking paths on a 74-acre site, with 0.22 mile of offsite biking and walking paths. The potential 560-dwelling units consist of 150 affordable, age-restricted apartments; 32 attached, age-restricted cottages; 94 attached, age-restricted units; 129 single-family detached, age-restricted units; 77 single-family detached, non-age-restricted units; 30 assisted living, age-restricted units in the care facility; and 48 attached, age-restricted units in the mixed-use area (DEIR, pp. ES-1-2).

Relevant to this Addendum is the Project's storm drainage system as it is the component proposed for modification. The system designed for the Project, shown in Figures 2.0-5 and -10 of the DEIR (pp. 2.0-23, 33), includes greenway swales, a perimeter drainage channel, relocation of a City drainage channel (the Covell Drain), and an offsite detention basin—all of which remain the same except for the offsite detention basin (Id., pp. 2.0-10–12). The preliminary offsite detention basin was to be approximately 450 feet by 150 feet with a maximum water depth of 3.4 feet (or 5.75 acre-feet) and located adjacent to and northeast of the Project Site, adjacent to and west of John Jones Road, and adjacent to the existing City detention basin (DEIR, pp. 2.0-11, -33 [Figure 2.0-10]; 3.9-5, -17, -21–22). The depth of the preliminary offsite detention basin was to be approximately equivalent to that of the City's basin (Id., pp. 2.0-12, 3.9-21). The DEIR specified that final layout and design of the storm drainage system was to be determined during final Project design (see Section 1.2).

2.2 Modified Project Components

The Project as presented in the previously certified EIR and summarized above remains the same with the exception of proposed modifications to the storm drainage system. As stated in the previously certified EIR and Section 1.2 above, final layout and design of the storm drainage system was always intended to be refined during the final design phase of the Project. The Project is now in its final design phase and requires additional offsite stormwater detention to meet County design standards and FEMA requirements for the CLOMR (Appendix A). To meet these stormwater detention requirements, the originally proposed agricultural buffer (which contains the perimeter drainage channel) and offsite detention basin that were estimated in the previously certified EIR must be moderately expanded and an additional offsite detention basin with adjoining 100-year storm event overflow area constructed, along with assorted appurtenant activity and components, all discussed below (referred to hereafter collectively as “modified Project components”) (see Section 1.2).

The additional offsite detention basin is proposed to be located on a separate parcel northwest of the Project Site, just outside the City's SOI and within the jurisdiction of Yolo County (Assessor's Parcel Number [APN] 036-020-018) (see DEIR, Figure 2.0-2, p. 2.0-17). On the parcel immediately north of the additional offsite detention basin will be the overflow area (APNs 06-020-018 and -012). The originally proposed agricultural buffer (which contains the perimeter drainage channel) and offsite detention basin will remain located as they were in the previously certified EIR, but will be expanded to allow for additional stormwater conveyance and storage. Figure 2-1 shows the location and orientation of the primary modified Project components (the combined acreage of which is referred to hereafter as the “Area of Implementation”).

Construction of these components will include grading, excavation, and soil relocation and require the use of heavy mechanical equipment, such as scrapers, haul trucks, tractors and excavators. Construction of modified Project components that will exist offsite and within the County's jurisdiction will occur within a continuous six-month period, with up to three months of soil movement and up to four months of landscaping work within buffers and detention basins. During the first four months of this construction period, approximately 429,000 cubic feet of soil will be excavated from the additional offsite detention basin, overflow area, and expanded agricultural buffer and offsite detention basin. Up to approximately 113,000 cubic feet of that excavated soil could be relocated to an offsite soil stockpile, depending on needs to be determined at the time of construction (discussed in more detail below) with a small portion used to backfill, as necessary, the overflow area. The remainder will be relocated to the Project Site, on land within the City's jurisdiction, to be used for onsite Project construction. These volumes may vary slightly as work progresses, and a temporary soil stockpile may be required during construction. See Appendix B for a soil reclamation plan that includes more detail.

The additional offsite detention basin and adjoining overflow area will consist of approximately 30 acres total, with approximately 5 acres for the basin and 25 acres for the overflow area. The 5-acre basin will have a maximum water depth of 17 feet. The 25-acre overflow area will serve as secondary drainage during a 100-year storm event. It will be excavated in depths from approximately four to eight feet depending on land slope. The overflow area then will be backfilled with native topsoil to a depth of approximately four inches up to one foot throughout, depending on topography. The originally proposed agricultural buffer will be expanded by approximately 2 acres (from just under 11 acres as originally proposed to approximately 13 acres) and connect the onsite storm drainage system to the additional offsite detention basin and adjoining overflow area. It also will continue to connect the onsite storage drainage system to the originally proposed offsite detention basin, which will be expanded by approximately 3 acres (from under 2 acres as originally proposed to almost 5 acres) and will adjoin the existing City detention basin.

Construction of this expanded offsite detention basin will require demolition of an existing service road used to access the West Davis Water Tank, located on an adjoining parcel, and an underlying domestic water main (see Figure 2-1). As a result, the Applicant/Developer will construct a new service access road that will extend north from the Risling Court—a road proposed for construction on the eastern side of development as part of the Project (see DEIR, Figures 2.0-6 to -07, p. 3.0-25, -27; see also DEIR, p. 2.0-11). The existing water main connects the West Davis Water Tank to the City's domestic water pipeline service (see DEIR, pp. 3.9-9, 3.15-19). The water main will be relocated just south of the existing City basin, to be constructed and funded by the Applicant/Developer and inspected and approved by the City. Prior to decommission of the existing water main, the new water main will be fully operational and connected by the City to ensure negligible disruption to City water services.

An offsite soil stockpile likely will be required and will be located just east of the overflow area, approximately 1,600 feet from Highway 113 on APNs 036-020-016 and -17, purposefully situated outside the stormwater flow of a 100-year storm event (see Figure 2-1; Section 3.2: Hydrology and Water Quality for more detail stormwater drainage). The stockpile would serve

as long-term storage of native soil excavated from the additional detention basin, overflow area, and expanded perimeter drainage channel and detention basin. It may vary in height and size, but will be no taller than 6 feet and no larger than just more than 6 acres with a 5:1 side gradient. As of the date of publication of this addendum, is anticipated that the stockpile may be significantly smaller this maximum size.

Modified Project components may also include a new storm drain pump station to evacuate stormwater from the additional offsite detention basin and a retrofit of the City’s existing storm drain pump station to evacuate stormwater from the perimeter channel located within the agricultural buffer (see Figure 2-1 for pump locations). The stations will pump water out of the additional offsite basin and the expanded offsite detention basin after storm events in accordance with the hydrologic modeling conducted for the project. Other anticipated improvements associated with the pumps include a wet well, piping to the downstream drainage outfall to Covell Drain (see Figure 2-1 and DEIR, p. 2.0-10), and any drainage outfalls as required by the authority having jurisdiction. All other elements of the preliminary storm drainage system remain as proposed in the previously certified EIR (see DEIR, p. 2.0-33 [Figure 2.0-10]). Figure 2-1 depicts the modified storm drainage system along with the originally proposed storm drainage system for comparison.

This Project area as modified shares the same general environmental setting as the Project Site, discussed in the previously certified EIR (DEIR, p. 2.0-1–2). The Area of Implementation is designated for Agriculture in the County General Plan and zoned as Agricultural Intensive (A-N) (DEIR, Figure 2.0-12, p. 3.0-37).⁷ The 30-acre total basin and overflow area is currently used for agricultural purposes and has been since at least 1937 (Appendix C, Phase I Environmental Site Assessment [without appendices] [10-16-2019]; see Section 3 for more technical details). The Area of Implementation consists of agricultural land that is farmed primarily by Duane Chamberlain of Chamberlain Farms. Chamberlain Farms currently grows oats for livestock feed on the Area of Implementation and will continue to do so after modified Project components are implemented (see Appendix D, Letter from Property Owner on Farming Practices [12-11-2019]). The agricultural area surrounding the project site and Area of Implementation, generally, is used for farming only grains, such as oats, and hay because of the “poor quality and low productivity of the soil” (Appendix D). Current farming practices onsite include the use of heavy mechanical equipment, such as scrapers, haul trucks, tractors and excavators, to perform common farming tasks, such as general earth moving, grading, plowing, tilling, creation and use of soil stockpiles, and excavation of soil for drainage ditches.

Modified Project components have been designed to minimally impact existing and historic farming practices on the Area of Implementation. The additional and expanded offsite detention basins will retain the characteristics and features of the originally proposed basin and will have their slopes stabilized, then be left to germinate organically with native weeds and grasses. The land within the proposed basins will not continue to be farmable. The adjoining overflow area, however, largely will continue to be farmable aside from its berm areas (see Appendix D).

⁷ See also Yolo County General Plan Land Use and Community Character Element, November 10, 2009, *County of Yolo 2030 Countywide General Plan* (available online at <https://www.yolocounty.org/home/showdocument?id=14468>); Yolo County Zoning Map, Adopted July 2014, (available online at <https://www.yolocounty.org/home/showdocument?id=31376>).

Berms will be designed to provide passive storage and will be installed for each of the three sub-basins to be constructed on the overflow area, in accordance with the County's requirements for 10-year to 100-year storm events. Berms will have a gentle 5:1 side slope consistent with the common farming practices (see Appendix B). Like the overflow area, the stockpile also will continue to be farmable after completion of earth moving activities required for implementation of modified Project components (see Appendix B and description above of construction activities). The farming practices that will continue on the overflow area and stockpile are not included as part of the Project because they are existing uses implemented by a third party, unrelated to the Project, and would continue without Project construction and operation; likewise with operation of the relocated domestic water main (see Appendix D).

Project background, goals, objectives and baseline features remain the same as in the previously certified EIR (DEIR, p. 2.0-2-3, 12).

2.3 New Project Entitlements and Approvals

As a result of modified Project components that extend outside the City's SOI and into the County's jurisdiction, the County has become a responsible, permitting agency in relation to the Project. Therefore, in addition to the entitlements from the City listed in the previously certified EIR (see DEIR, p. 2.0-3), the Project may require the following permits:

- Yolo County Grading Permit Development Permit (Yolo County Code of Ordinances ("YCCO") § 8-4.403, Flood Protection Ordinance)
- Yolo County Surface Mining Permit or approved exemption⁸

To issue any permit for the Project's components in the unincorporated area, the County requires farmland offset measures as presented in its Agricultural Conservation and Mitigation Plan that were not represented in the previously certified EIR or approved MMRP because, at that time, the Project was constrained mostly to land within City boundaries or that was to be annexed. This County plan prescribes offset measures for farmland that may be converted from agricultural use or changed to a predominantly non-agricultural use with farmland offsets ratios that vary for conversion of Prime Farmland and conversion of non-Prime Farmland (Farmland of Statewide Importance and Farmland of Local Importance) (YCCO § 8-2.404; see DEIR, pp. 3.2-3-5). Offset ratios may be reduced depending on a variety of adjustment factors (YCCO § 8-2.404(d).)

The County's Agricultural Conservation and Mitigation Program ("ACMP") requires easement offsets for any farmland that will be taken out of active farming production as a result of implementation of modified Project components (i.e., detention basins, agricultural buffer, and

⁸ A Surface Mining Permit is a Major Use Permit subject to CEQA (YCCO § 8-2.304 [see Table 8.2-304(d)]. Surface mining is regulated by California's Surface Mining and Reclamation Act (SMARA). Permits are generally administered by local agencies and may be required for activities that disturb more than one acre or remove more than 1,000 cubic yards of material. The County's Surface Mining Reclamation Ordinance further regulates local mining activities and offers exceptions for special circumstances (YCCO §§ 10-5.101-1211, 10-5.534). At the time of preparation of this document, it had not yet been determined whether the modified Project components would require a Surface Mining Permit from the County.

non-farmable berms bordering the overflow area).⁹ The acreage of the offset depends in part on whether the farmland at issue is Prime or non-Prime and the location of where the mitigation easements are located. To determine Prime Farmland, the County looks to the Farmland Mapping and Monitoring Program of the U.S. Department of Agriculture (USDA Land Inventory)¹⁰ and criteria as defined in Government Code section 51201 (§ 8-2.404(b)).

The Area of Implementation contains six soil types on land within the County’s jurisdiction, of which three meet the criteria for Prime Farmland pursuant to the USDA Land Inventory (see Appendix E, Agricultural Mitigation [04-2020]; see also DEIR, Figures 3.2-1 and 3.2-2, pp. 3.2-17, -19). Government Code section 51201 considers additional criteria to determine Prime Farmland. As shown below, only the first criterion is met, and this criterion only corroborates USDA Land Inventory results but does not expand them.

- 1) Land that rates as class I or class II in the Natural Resource Conservation Service land use capability classifications: *Class I and II rated land corresponds to USDA Land Inventory classifications—therefore, this criterion is met;*
- 2) Land that qualifies for rating 80 through 100 in the Storie Index: *Applicable soils do not rate between 80 to 100 on the Storie Index,¹¹ therefore, this criterion is not met;*
- 3) Land that supports livestock used for the production of food/fiber and has an annual carrying capacity of at least one animal unit per acre as defined by the USDA: *The Area of Implementation does not currently support, or has not historically supported, livestock (see Appendix D)—therefore, this criterion is not met;*
- 4) Land planted with fruit- or nut-bearing trees, vines, bushes, or crops that have a nonbearing period of less than five years and that will normally return during the commercial bearing period on an annual basis from the production of unprocessed agricultural plant production at least \$200 per acre: *The Area of Implementation is not currently, and was not historically, planted with fruit- or nut-bearing trees, vines, bushes, or crops that have a nonbearing period of less than five years—therefore, this criterion is not met;* and
- 5) Land that has returned from the production of unprocessed agricultural plant products an annual gross value of at least \$200 per acre for three of the previous five years (Govt. Code § 51201(c)): *The Area of Implementation is not land that has returned from the production of unprocessed agricultural plant products of an annual gross value of at least \$200 per acre for three of the previous five years—therefore, this criterion is not met.*

⁹ Any acreage removed from active farming will not lose its formal classification as Prime Farmland, Farmland of Statewide Importance, or Farmland of Local Importance. This acreage still will be zoned and designated as Agricultural (see section 8-2.404(b); see also Section 3: Agriculture). The County-required farmland offset measures were not included as mitigation in the previously certified EIR nor were they part of the adopted MMRP because the County’s mitigation requirements are separate from CEQA, and, in some cases, require greater mitigation. MM 3.2-1 from the previously certified EIR did not require mitigation for buffers and detention basins. These County farmland offsets are in addition to the mitigation provided for in the EIR, as described above in the text.

¹⁰ California Department of Conservation, *Farmland Mapping and Monitoring Program Soil Candidate Listing for Prime Farmland and Farmland of Statewide Importance, Yolo County*, June 1972 (available online at https://www.conservation.ca.gov/dlrp/fmmp/Documents/fmmp/pubs/soils/Yolo_gSSURGO.pdf).

¹¹ USDA, *Soil Survey for Yolo County, California*, June 1972 (available online at https://www.nrcs.usda.gov/Internet/FSE_MANUSCRIPTS/california/yoloCA1972/yoloCA1972.pdf), Guide to Mapping Unit.

Appendix E presents the acreages of potentially impacted Prime Farmland and non-Prime Farmland within the County’s jurisdiction that will be removed from active farming by modified Project components.

2.4 Alternatives Evaluation for Modified Project Components

CEQA requires that an EIR include a comparative evaluation of a proposed project and alternatives to the project, including the “No Project” alternative (PRC § 21002; CEQA Guidelines § 15126.6). The previously certified EIR addressed a reasonable range of alternatives for the project—No Project (No Build) Alternative; Conventional (Non-Age Restricted) Alternative; Higher Density, Less Land Alternative; and Off-Site (Inside Mace Curve) Alternative (DEIR, pp. 5.01-1–28; see p. 5.0-26, for a comparison of alternatives). No revisions to alternatives were made in the FEIR (FEIR, pp. ES-2–3, 3.0-10). In its Statement of Findings and Overriding Considerations (Findings),¹² the City rejected all of the alternatives for not fully achieving Project objectives, resulting in greater impacts, and/or providing fewer benefits while not avoiding any significant and unavoidable impacts (Findings, pp. 36–39).

No new information exists that would modify the alternatives analysis conducted in the previously certified EIR—no infeasible alternative has become feasible and no new alternative has arisen that would substantially reduce one or more significant effects on the environment.

3. ENVIRONMENTAL ANALYSIS AND CHECKLIST

3.1 Scope of Review

This Addendum evaluates only whether the modifications to the approved Project would result in new or substantially more severe significant impacts than were disclosed in the previously certified EIR (CEQA Guidelines § 15162(a)(1)). As described below, no new circumstances have occurred, and no new information of substantial importance has come to light, that would create new significant impacts or increase the severity of existing impacts (CEQA Guidelines § 15162(a)(2–3); see Section 1.1).

The previously certified EIR evaluated potential environmental impacts on the following issue areas pursuant to CEQA Guidelines in effect at that time: Aesthetics, Agricultural Resources, Air Quality, Biological Resources, Cultural and Tribal Resources, Geology and Soils, Greenhouse Gases/Climate Change/Energy, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use, Noise and Vibration, Population and Housing, Public Services and Recreation, Transportation and Circulation, and Utilities (DEIR, Chapter 3.0, pp. 3.1-1–3.15-38); FEIR, pp. 3.0-1–9).

It was determined in the previously certified EIR that the Project would have:

¹² Findings can be found in City Council Staff Report dated 06-12-2018, available online at <http://documents.cityofdavis.org/Media/Default/Documents/PDF/CityCouncil/CouncilMeetings/Agendas/20180612/06-West-Davis-Active-Adult-Community.pdf>, pp. 06-10 et seq. (known hereafter as “Findings”).

- Less-than-significant environmental impacts to Aesthetic Resources, Agricultural Resources, Air Quality, Biological Resources, Geology and Soils, Greenhouse Gases/Climate Change/Energy, Hazards and Hazardous Materials, Public Services and Recreation Hydrology and Water Quality, Land Use, Noise and Vibration, Population and Housing, Transportation and Circulation, and Utilities;
- Potentially significant impacts that are mitigatable to less-than-significant levels to Aesthetic Resources, Air Quality, Biological Resources, Cultural and Tribal Resources, Geology and Soils, Greenhouse Gases/Climate Change/Energy, Hazards and Hazardous Materials, and Hydrology and Water Quality; and
- Significant and unavoidable impacts to Aesthetic Resources, Agricultural Resources, Air Quality, and Transportation and Circulation (DEIR, pp. ES-5–32).¹³

As previously explained in Section 1.1, the State updated the Appendix G CEQA Guidelines Checklist between certification of the previous EIR and preparation of this Addendum. Although not required, this Addendum assesses the new and revised issue areas to address any potential impacts resulting from modified Project components. Issue areas analyzed in this Addendum include: Aesthetics, Agriculture and Forestry Resources, Air Quality, Biological Resources, Cultural Resources, Energy, Geology/Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology/Water Quality, Land Use/Planning, Mineral Resources, Noise, Population/Housing, Public Services, Recreation, Transportation, Tribal Cultural Resources, Utilities/Service Systems, Wildfire, and Mandatory Findings of Significance.

3.2 Environmental Checklist

The purpose of this checklist is to evaluate each potential area of impact within each issue area considered under CEQA for any new or substantially more severe environmental impacts as a result of modified Project components (CEQA Guidelines § 15162(a)(1)). The checklist provides references to pages of the previously certified EIR (Draft and Final) where information and analysis may be found relative to the area of impact and any associated mitigation measures.

The checklist also provides discussion of each checklist item and of mitigation measures from the previously certified EIR’s MMRP that apply to modified Project components, along with implementation status updates as appropriate. Lastly, each discussion section ends with the conclusion reached for that issue area.

As demonstrated below, there are no significant new or substantially more severe environmental impacts than were analyzed in the previously certified EIR from implementation of modified Project components that would require preparation of a subsequent EIR.¹⁴

¹³ In the City’s Findings, these significant and unavoidable impacts were outweighed by the economic, social, and other benefits of the Project, including in increase in affordable and senior housing, improvements to the offsite transportation system, and consistency with City planning documents (Findings, pp. 6-49–52).

¹⁴ When project changes “[do] not raise any new effects which the EIR had not already reviewed and analyzed” then preparation of a subsequent EIR is not warranted (*River Valley Preservation Project v. Metropolitan Transit Development Bd.* (1995) 37 Cal.App.4th 154, 177 [upholding an addendum to a certified EIR for a project change that likely would impact storm flows because related impacts were “recognized” in the original EIR]; see *Santa Teresa Citizen Action Group v. City of San Jose* (2003) 114 Cal.App.4th 689, 704 [upholding an addendum for a change in a pipeline alignment because the realignment was “not significantly different” than the one fully evaluated in the EIR and no evidence suggested any greater threat to the environment from the original project]).

Environmental Issue Area	Where Was the Impact Analyzed in the Prior Environmental Document(s)?	Do Proposed Changes Involve New Significant, or Substantially More Severe, Impacts?	What Are the Prior Mitigation Measures Addressing the Impacts?
I. AESTHETICS. Would the Project:			
a. Have a substantial adverse effect on a scenic vista?	Impact 3.1-1 (DEIR, pp. 3.1-6–8)	No	None
b. Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	Impact 3.1-1 (DEIR, pp. 3.1-6–8) Impact 3.1-3 (DEIR, p. 3.1-10)	No	None
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	Impact 3.1-1 (DEIR, pp. 3.1-6–8)	No	None
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	Impact 3.1-2 (DEIR, pp. 3.1-9–10)	No	MM 3.1-1 (DEIR, p. 3.1-10)
<p>Discussion:</p> <p>a/b/c. No Significant New or Substantially More Severe Impacts. See impact discussion on pages 3.1-6–8 and -10 of the DEIR. The previously certified EIR concluded that potential impacts to scenic vistas and resources from the Project were less than significant. Like the Project, modified Project components will not occur on or near a state scenic highway or any identified scenic vista. Therefore, no substantially new or more severe impacts to scenic vistas and resources will occur.</p> <p>Conversely, the previously certified EIR found impacts to existing visual character were significant and unavoidable. But, unlike the Project, the modified Project components will not introduce any structures that might degrade the visual character of the site or its surroundings. The parcels on which modified Project components will be implemented (i.e., Area of Implementation) are located within a non-urbanized area and, after grading and infrastructure relocation, the affected land will largely remain either as it currently exists—agricultural land being utilized for farming crops such as grain and hay—or consistent with the ag and open space uses in the area (see Appendix D). The singular element of the modified Project components that may be perceived by</p>			

a member of the public is the soil stockpile. But, this stockpile: will be located approximately 1,600 feet away from Highway 113—the only road from which it could potentially be viewed by the public (see Figure 2-1); will not exceed a height of 6 feet or maximum area of just more than 6 acres, which is a fraction of the size of its surrounding agricultural land; and can continue to be farmed in the same way as the surrounding land—effectively blending with the agricultural landscape and matching the existing visual character of the area. Furthermore, as discussed above, it is anticipated that the stockpile may be significantly smaller than its estimated maximum size. Therefore, no substantially new or more severe impacts to visual character will occur.

d. No New or Substantially More Severe Impact. See impact discussion on pages 3.1-9–10 of the DEIR. The previously certified EIR concluded that potential impacts to day-or-nighttime views as a result of light or glare were less than significant with mitigation. Unlike the Project, modified Project components will not create a new source of light and glare because there will be no new development or structures of any kind—only grading followed by agricultural use as currently exists onsite. Therefore, no substantially new or more severe impacts to day-or-nighttime views will occur.

Mitigation Measures: None applicable or required.

Conclusion: Implementation of modified Project components would create no significant new or substantially more severe impacts; no mitigation is required.

Environmental Issue Area	Where Was the Impact Analyzed in the Prior Environmental Document(s)?	Do Proposed Changes Involve New Significant, or Substantially More Severe, Impacts?	What Are the Prior Mitigation Measures Addressing the Impacts?
II. AGRICULTURE. Would the project:			
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	Impact 3.2-1 (DEIR, pp. 3.2-11–13)	No	MM 3.2-1 (DEIR, pp. 3.2-12–13)
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	Impacts 3.2-2 and 3.2-3 (DEIR, pp. 3.2-13–14)	No	None
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined	Not Applicable (DEIR, p. 3.2-11)	No	None

by Government Code section 51104(g))?			
d. Result in the loss of forest land or conversion of forest land to non-forest use?	Not Applicable (DEIR, p. 3.2-11)	No	None
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	Impact 3.2-4 (DEIR, pp. 3.2-14–16)	No	MM 3.2-2 (DEIR, p. 3.2-16)

Discussion:

a/e. No Significant New or Substantially More Severe Impact. See impact discussion on pages 3.2-11–12 and -14–16 of the DEIR. The previously certified EIR concluded that potential impacts to Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (collectively referred to as “Farmland”) were significant and unavoidable because of permanent direct conversion to urban uses and as a result of indirect impacts to adjacent Farmland (see Impacts 3.2-1 and 3.2-4). The Area of Implementation also contains Prime Farmland and Farmland of Local and Statewide Importance. Approximately 20 acres of Farmland (only approximately 2.8 acres of which is Prime) will be taken out of agricultural production for construction of the proposed detention basins, berms surrounding the overflow area, and drainage channels (see Appendix E and Figure 2-1). However, although this Farmland will be removed from agricultural production, it will not be converted to a non-agricultural use as no structures will be constructed, the area will remain zoned for agriculture, and the proposed detention basins, berms surrounding the overflow area, and drainage channels are generally consistent with agricultural use. (see Aesthetics above for a larger discussion on the lack of structures and Land Use and Planning below for a larger discussion on zoning). The loss of agricultural production of this Farmland will also be mitigated in the same manner as previously required for the Project. MM 3.2-1 requires acreage to be set aside for the loss of active farmland, including any farmland used for detention basins. In addition to the mitigation required in the previously certified EIR, the County is requiring farmland offsets for any farmland located within the County’s jurisdiction that is removed from active farming as a result of implementation of the modified Project components (see Section 2.3). Further, the loss of agricultural production of this Farmland is not a substantial increase over the 84 acres of fully converted Farmland that were analyzed in the previously certified EIR. Therefore, no substantially new or more severe impacts, direct or indirect, to Farmland will occur.

b. No Significant New or Substantially More Severe Impact. See impact discussion on pages 3.2-13–14 of the DEIR. The previously certified EIR concluded that potential impacts to existing zoning for agricultural use, and to Williamson Act contract land were less than significant. The Area of Implementation is designated for Agriculture in the County General Plan and zoned as Agricultural Intensive (A-N) (see DEIR, Figures 2.0-11 and -12, pp. 2.0-35, -37; pp. 3.2-1–2, -7; see also Section 2.2). After implementation of modified Project components, the Area of Implementation will continue to be zoned for agriculture. And, like the Project Site, these parcels are not under a Williamson Act contract. Therefore, no substantially new or more severe impacts to existing zoning for agricultural use or to Williamson Act contract land will occur.

c/d. No Significant New or Substantially More Severe Impact. See impact discussion on page 3.2-11 of the DEIR. The previously certified EIR concluded that there would be no potential impact to forest resources or zoning for forest or timberland because there are no forest lands, resources, or forest or timberland zoning located on or near the Project Site, including the Area of Implementation (see DEIR, Figure 2.0-12, p. 2.0-37; see also Id., Appendix A,

p. 45). Therefore, no substantially new or more severe impacts to forest land, resources, or zoning for forest or timberland will occur.

Mitigation Measures: MM 3.2-1.

Mitigation Implementation Updates

MM 3.2-1 requires that the Applicant/Developer set aside in perpetuity active agricultural acreage at a minimum ratio of 2:1 to offset any loss of farmland, including that lost as a result of construction of the offsite detention basin. As of December 2019, the Applicant/Developer has identified four properties available to fulfill the mitigation requirement and met with the City to discuss effectuating the mitigation, with plans to present a submittal package to the Open Space and Habitat Commission on February 3, 2020. See Section 2.3 for details on additional County agricultural mitigation that is being required for issuance of a County approvals.

Conclusion: With implementation of the applicable mitigation measure identified in the previously certified EIR and listed above, construction and operation of modified Project components would create no significant new or substantially more severe impacts.

Environmental Issue Area	Where Was the Impact Analyzed in the Prior Environmental Document(s)?	Do Proposed Changes Involve New Significant, or Substantially More Severe, Impacts?	What Are the Prior Mitigation Measures Addressing the Impacts?
III. AIR QUALITY. Would the project:			
a. Conflict with or obstruct implementation of the applicable air quality plan?	Impacts 3.3-1, 3.3-2, and 3.3-3 (DEIR, pp. 3.3-18–24)	No	MMs 3.3-1 and 3.3-2 (DEIR, pp. 3.3-19–20, -22–23)
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	Impact 4.3 (DEIR, pp. 4.0-5–7; FEIR, pp. 3.0-8–9)	No	MMs 3.3-1 and 3.3-2 (DEIR, pp. 3.3-19–20, -22–23)
c. Expose sensitive receptors to substantial pollutant concentrations?	Impact 3.3-4 (DEIR, pp. 3.3-24–27)	No	None
d. Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?	Impact 3.3-5 (DEIR, pp. 3.3-27–28)	No	None

Discussion:

a. No Significant New or Substantially More Severe Impact. See impact discussion on pages 3.3-18 to -24 of the DEIR. The Yolo-Solano Air Quality Management District (YSAQMD) *Draft Triennial Assessment and Plan Update* is the applicable air quality plan (DEIR, pp. 3.3-12–13). YSAQMD is tasked with ensuring federal and state air quality standards that are measured and met within Yolo and Solano Counties (Id., p. 3.3-12). The previously

certified EIR concluded that Project operational emissions would be significant and unavoidable with respect to particulate matter 10 micrometers or less in diameter (PM₁₀), even with mitigation, and therefore would conflict with the applicable air quality plan. Project construction emissions would be less than significant with mitigation, and therefore would not conflict with the applicable air quality plan.

Modified Project components will not increase operational emissions because the Area of Implementation largely will remain as it currently exists—farmland being used for agricultural purposes with added storm water facilities and open space—and will not introduce any structural development that would create air emissions. Nor would there be any additional vehicle trips, which would create air emissions, that could be attributed to the Project because, although farming practices will continue on the Area of Implementation largely as they have since at least 1937, which will include some vehicle trips, these activities are part of the baseline conditions and not a part of the Project. But, as discussed above in Agriculture, the amount of land being actively farmed will be reduced primarily as a result of the additional offsite detention basin and expanded detention basin and agricultural buffer, thereby providing the air quality benefit of slightly reducing existing operational emissions associated with farming.¹⁵

As described in Section 2.2, construction activities associated with modified Project Components consist primarily of grading, excavation, and soil relocation and require the use of heavy mechanical equipment, such as scrapers, haul trucks, tractors, and excavators, to create the overflow area, detention basins, buffers/drainage channels, and to implement other earth moving activities, such as the relocation of topsoil to a stockpile (see Appendix B). Construction emissions associated with these activities will be significantly less intensive than that of the Project, temporary (see Appendix B for timeline of earthmoving activities), mitigated in the same manner as the approved Project (see MM 3.3-2), and, likewise, will remain below regional thresholds of significance (DEIR, p. 3.3-23). Further, once the Area of Implementation is graded and soil redistributed, all components will be stabilized and covered either with crops or allowed to organically seed with native grasses and weeds, ensuring that any soil-related PM emissions are minimized (see Section 2.2). As a result, the modified Project components will not exceed any thresholds of significance for air quality standards and, thus, will not conflict with the applicable air quality plan. Therefore, no substantially new or more severe impacts to air quality as a result of conflicts with applicable plans will occur.

b. No Significant New or Substantially More Severe Impact. See impact discussion on pages 4.0-5 to -7 of the DEIR and 3.0-8 to -9 of the FEIR. The previously certified EIR concluded that potential impacts to air quality as a result of cumulatively considerable net increases of criteria pollutants for which the Project region is non-attainment were significant and unavoidable. These cumulatively considerable increases emanate from operational emissions of reactive organic gasses (ROG), nitric oxide (NO_x), and PM₁₀, primarily resulting from vehicle trips to and from the Project site during operation (DEIR, p. 3.3-18). Even with mitigation (MM 3.3-1), the increase in emissions remain cumulatively considerable for the Project. See above for a discussion on air quality impacts associated with modified Project components. Modified Project components will produce negligible criteria pollutants during operation and construction-related emission will be temporary and mitigated to below regional thresholds of significance. Thus, impacts to air quality will be less than significant and not cumulatively considerable (DEIR, p. 4.0-6, 3.3-23; MM 3.3-2). Therefore, no substantially new or more severe impacts to air quality as a result of a cumulatively considerable net increases of criteria pollutants will occur.

c. No Significant New or Substantially More Severe Impact. See impact discussion on pages 3.3-24 to -27 of the DEIR. The previously certified EIR

¹⁵ The YSAQMD *Handbook for Assessing and Mitigating Air Quality Impacts* (Adopted July 11, 2007) excludes farming as a land use category that may exceed applicable air quality thresholds (available online at <http://www.ysaqmd.org/wp-content/uploads/Planning/CEQAHandbook2007.pdf>, p. 10; see DEIR, p. 3.3-13).

concluded that potential impacts to sensitive receptors from substantial pollutant concentrations were less than significant. Sensitive receptors exist in the immediate vicinity of the Project site to the east and south but were nevertheless found to be unaffected by any substantial pollutant concentrations that may be associated with the Project (DEIR, pp. 3.3-5-6, -25). The Area of Implementation is even further removed from any sensitive receptors—located northwest of the Project Site and, with the exception of the yet-to-be constructed Project, immediately surrounded by farmland. Further, modified Project components would create only negligible operational emissions (the majority of which are not included as a part of the Project) and mitigable construction emissions (see discussion above), thereby producing a less-than-significant amount of toxic contaminants, if any. Therefore, no substantially new or more severe impacts to sensitive receptors from substantial pollutant concentrations will occur.

d. No Significant New or Substantially More Severe Impact. See impact discussion on pages 3.3-27 to -28 of the DEIR. The previously certified EIR concluded that potential impacts of other emissions, such as odors, were less than significant because objectionable odors would not be created by the Project to any significant degree. As discussed above, modified Project components will not be located near existing sensitive receptors, nor will they create odors considered to be significantly objectionable.¹⁶ Therefore, no substantially new or more severe impacts as a result of other emissions, such as odors, will occur.

Mitigation Measures: MM 3.3-2.

Conclusion: With implementation of the applicable mitigation measure identified in the previously certified EIR and listed above, construction and operation of modified Project components would create no significant new or substantially more severe impacts.

Environmental Issue Area	Where Was the Impact Analyzed in the Prior Environmental Document(s)?	Do Proposed Changes Involve New Significant, or Substantially More Severe, Impacts?	What Are the Prior Mitigation Measures Addressing the Impacts?
IV. BIOLOGICAL RESOURCES. Would the project:			
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or	Impacts 3.4-1, 3.4-2, 3.4-3, 3.4-4, 3.4-5, and 2.4-6 (DEIR, pp. 3.4-15-27)	No	MMs 3.4-1, 3.4-2, 3.4-3, 3.4-4, 3.4-5, 3.4-6, 3.4-7, 3.4-8, and 3.4-9 (DEIR, pp. 3.4-16, -18-19, -22-25, -27; FEIR, pp. 3.0-2-3)

¹⁶ Because ongoing farming on the Area of Implementation is an existing practice that is not considered a part of the Project (see Section 2.0), any odors associated with farming are not effects of the Project or modified Project components. Nevertheless, YSAQMD *Handbook for Assessing and Mitigating Air Quality Impacts*, supra, excludes grain farming as a land use that produces odorous omissions (p. 14) and states that agricultural-related odors are exempted from nuisance laws that govern odors (p. 23).

U.S. Fish and Wildlife Service?			
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	Impact 3.4-8 (DEIR, pp. 3.4-28)	No	None
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	Impact 3.4-7 (DEIR, p. 3.4-27–28)	No	MM 3.4-10 (DEIR, p. 3.4-28)
d. Interfere substantially with the movement of any native resident or migratory fish and wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	Impact 3.4-9 (DEIR, p. 3.4-29)	No	None
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.	Impact 3.4-10 (DEIR, pp. 3.4-29–31)	No	MM 3.4-11 (DEIR, p. 3.4-31)
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	Impacts 3.4-11 and 3.10-3 (DEIR, pp. 3.4-31–32; 3.10-16–17)	No	MM 3.4-12 (DEIR, p. 3.4-32)

Discussion:

a. No Significant New or Substantially More Severe Impact. See impact discussion on pages 3.4-15 to -27 of the DEIR. The previously certified EIR concluded that potential impacts to species identified as candidate, sensitive, or special status species—including invertebrates, reptiles and amphibians, birds, mammals, and plants—were less than significant with mitigation. The Project was found to have no impacts on fish species. As with the Project, the Area of Implementation is agricultural, consisting primarily of grain and hay crops, with some vegetation areas classified as semi-agricultural, California annual grassland, and freshwater marsh alliance (DEIR, Figure 3.4-2, p. 3.4-33; see Appendix F, Planning Level Survey Report for Bretton Woods Project

[11-19-2019] and ESA Section 7 “No-Take” Memorandum [12-20-2019] [Figure 2]). The Area of Implementation is actively farmed and has been for at least 30 years, with eight of those years under current ownership (DEIR, p. 3.4-26; see Appendix D). Because of this ongoing, long-standing agricultural use, these parcels do not provide the necessary habitat to support most of the 51 special-status species with the potential to occur within the region (DEIR, pp. 3.4-4–9, 3.4-15). There are no trees, bushes, or shrubs located on the Area of Implementation that might provide habitat for special-status species, like bats or the valley elderberry longhorn beetle (*Desmocerus californicus dimorphus*), or any other special-status insect species, as exists on the Project Site (Id., pp. 3.4-15, -24–25; see Figure 2-1). The Area of Implementation, like the Project Site, also does not contain vernal pools or other aquatic habitat that might host special-status brachiopods or fish species. (Id., p. 3.4-15, -19; see below for more on potential impacts to wetlands). Most special-status plant species that exist in the region cannot occur on the Area of Implementation because of periodic grading, tilling, and disking that has disturbed, and will continue to disturb, the land and which precludes their implantation, with one exception discussed below (Id, p. 3.4-26).

The Area of Implementation includes potential habitat for a few special-status animal species. Like the Project Site, it provides nesting and/or foraging ground for the Swainson’s hawk (*Buteo swainsoni*) (DEIR, p. 3.4-20), burrowing owl (*Athene cunicularia*) (Id.), and white-tailed kite (*Elanus leucurus*) (Id., p. 3.4-21). Also, marginal habitat for the western pond turtle (*Emys marmorata*) and giant garter snake (*Thamnophis gigas*) may be, or may become, present onsite in and around the existing irrigation/agricultural ditch and proposed detention basins, although it is unlikely these species would occur given the lack of connectivity to known source populations (DEIR, p. 3.4-17; see also Figure 3.4-3, p. 3.4-37; see also Appendix G, Aquatic Resources Delineation Report and Jurisdictional Determination [09-2019] [Figure 3]). Further, a population of San Joaquin spearscale (*Extriplex joaquinana*) has been observed along the northern portion of the Area of Implementation, where the proposed overflow area would be located (Appendix F [p. 3]). Of the special-status species that potentially could occur in the Area of Implementation, only the giant garter snake has protection under the Endangered Species Act (ESA) as a federally threatened species (DEIR, p. 3.4-8). The white-tailed kite is federally protected under the Migratory Bird Treaty Act (Id., p. 3.4-7). The remaining species have a variety of protection under California laws (Id., Table 3.4-2, pp. 3.4-4–9). The DEIR contemplated these potential impacts and the City adopted mitigation to lessen their effect to a less-than-significant level, which apply equally to modified Project components (MMs 3.4-2 to 3.4-6 and 3.4-8). The mitigation measures included avoidance and impact minimization measures for the western pond turtle, giant garter snake, western burrowing owl, Swainson’s hawk, and other protected bird species and bats. The EIR also provided that the Project would comply with the Yolo Habitat Conservation Plan / Natural Community Conservation Plan (“HCP/NCCP”), which at the time had not yet been adopted. Now that the HCP/NCCP is in place, the Project will comply with its requirements, including for the Area of Implementation. As a result of mitigation and the very low likelihood of occurrence of ESA-protected species on the Area of Implementation, there will be no “take” of federally protected species as prescribed by the Endangered Species Act (16 U.S.C. §§ 1532(19), 1538(a)(1)(B); see Appendix F). A memorandum dated December 20, 2019, was issued by a qualified biologist that confirms these no-take results and was submitted to FEMA as a part of the CLOMR process (see Appendix F). Therefore, no substantially new or more severe impacts to species identified as a candidate, sensitive, or special status species will occur.

b. No Significant New or Substantially More Severe Impact. See impact discussion on page 3.4-28 of the DEIR. The previously certified EIR concluded that potential impacts to riparian habitat or other sensitive natural communities were less than significant because only one sensitive habitat, Valley Oak Woodland, occurred in the region, but did not occur onsite. The same analysis and conclusion apply to the Area of Implementation (see DEIR, Figure 3.4-2, p. 3.4-35). Therefore, no substantially new or more severe impacts to sensitive habitat will occur.

c. No Significant New or Substantially More Severe Impact. See impact discussion on pages 3.4-27 to -28 of the DEIR. The previously certified EIR concluded that potential impacts to state or federally protected wetlands and jurisdictional waters were less than significant with mitigation. Aquatic features

such as agricultural ditches, a detention basin, and the Covell Drainage Channel occur on the Project Site that require delineation as approved by the U.S. Army Corps of Engineers (USACE) to determine their jurisdictional status. Likewise, the proposed offsite detention basins have an agricultural/irrigation ditch adjacent and parallel to their southern border, extending to County Road 99D, that also requires delineation (Appendix G [Figure 3]; see also DEIR, Figure 3.4-3, p. 3.4-37). MM 3.4-10 requires this delineation and acquisition of Clean Water Act section 404 and/or 401 permits prior to construction for jurisdictional aquatic features to either avoid or minimize disturbance to these features. A wetland delineation report was prepared for the Project Site and Area of Implementation and was formally substantiated by the USACE in their jurisdiction determination letter, which shows some jurisdictional features on the Project Site but none on the Area of Implementation (Appendix G [Figure 3]; see discussion of MM 3.4-10 below). As a result, no Clean Water Act permits are required for activities that will be conducted on the Area of Implementation. Therefore, no substantially new or more severe impacts to federally protected wetlands will occur.

d. No Significant New or Substantially More Severe Impact. See impact discussion on page 3.4-29 of the DEIR. The previously certified EIR concluded that no potential impacts would occur to native resident or migratory fish and wildlife species or established native resident or migratory wildlife corridors or nursery sites because none were known to exist on or adjacent to the Project Site. As a property adjacent to the Project Site, the Area of Implementation also does not contain these biological resources and, therefore, no substantially new or more severe impacts to these resources will occur.

e. No Significant New or Substantially More Severe Impact. See impact discussion on pages 3.4-29 to -31 of the DEIR. The previously certified EIR concluded that potential impacts resulting from conflicts with local policies or ordinances protecting biological resources would be less than significant with mitigation. The DEIR listed two applicable local policies: the Swainson's Hawk Interim Mitigation Fee Program and the City of Davis Tree Preservation Ordinance. The Swainson's Hawk Program is applicable to both the Project Site and Area of Implementation because both contain potential foraging habitat. MM 3.4-5, discussed above and below, ensures that the Applicant/Developer complies with this Program. The City of Davis Tree Preservation Ordinance is applicable to the Project Site because it is located within the City's SOI and trees exist onsite. But no trees exist on the Area of Implementation nor is the area located within the City's SOI, so additional mitigation under the City of Davis Tree Preservation Ordinance is not warranted. Therefore, no substantially new or more severe conflicts with these local plans will occur.

f. No Significant New or Substantially More Severe Impact. See impact discussion on pages 3.4-31 to -32 and 3.10-16 to -17 of the DEIR. The previously certified EIR concluded that potential impacts resulting from conflicts with habitat or natural conservation plans would be less than significant with mitigation. The Yolo HCP/NCCP is the applicable plan for the Project Site and Area of Implementation (DEIR, p. 3.4-11; YCCO §§ 10-13.1–13.10). The plan governs mitigation of impacts resulting from permanent loss of habitat for special-status species identified in the HCP/NCCP. MMs 3.4-5 and 3.4-12 will ensure Project compliance with all mitigation and conservation requirements. However, modified Project components will not permanently impact habitat associated with these identified species because the Area of Implementation will remain largely as it currently exists—as agricultural land and open space (see Agriculture above). And, any potential temporary impacts that may occur during construction would be mitigated (see above). Therefore, no substantially new or more severe conflicts with the applicable conservation plan will occur.

Mitigation Measures: MMs 3.4-2, 3.4-3, 3.4-4, 3.4-5, 3.4-6, 3.4-8, 3.4-10, and 3.4-12.

Mitigation Implementation Updates

MM 3.4-5 requires compensation to the HCP/NCCP vis-à-vis the Yolo HCP/NCCP administered by the Yolo Habitat Conservancy Joint Powers Agency, of

which the City of Davis is a member, to mitigate for the loss of potential Swainson’s hawk foraging habitat and Valley Elderberry Longhorn Beetle habitat. The Applicant/Developer is currently coordinating with the Yolo Habitat Conservancy to effectuate this compensation. The Yolo Habitat Conservancy will determine the extent of habitat requiring mitigation, including for the Area of Implementation. Mitigation fees will be paid to the Yolo Habitat Conservancy by the Applicant/Developer.

MM 3.4-8 requires a focused pre-construction survey for California Native Plant Society (CNPS)-listed plants that may occur on the Project Site. This survey was conducted on September 18, 2018, May 6, 2019, and August 28, 2019, on the Project Site and Area of Implementation, results of which can be found in Appendix F and are incorporated into the above discussion.

MM 3.4-10 requires a USACE-approved delineation of aquatic features to determine their jurisdictional status as federally protected wetlands and obtain any applicable Clean Water Act permits (Section 401 or 404). This delineation was conducted on August 16, 17, and 21, 2018, and August 19, 2019, on the Project Site and Area of Implementation and concluded that the agricultural/irrigation ditch within the Area of Implementation was non-jurisdictional (see Appendix G [p. 4, Figure 3]). The only jurisdictional aquatic resource found is the Covell Drainage Channel that occurs on the Project Site. On November 8, 2019, a section 401 permit application was submitted for this jurisdictional feature by the Applicant/Developer to the California State Water Resources Control Board, the conditions of which shall be followed during construction (see Appendix H, Section 401 Permit Application [without attachments] [11-08-2019]). On December 11, 2019, USACE issued a preliminary jurisdictional determination for the Project Site jurisdictional features and an approved jurisdictional determination for the Area of Implementation agricultural/irrigation ditch that substantiated the results of the delineation (Appendix G [jurisdictional determination Letter from UCACE dated December 11, 2019]).

Conclusion: With implementation of applicable mitigation measures identified in the previously certified EIR and listed above, construction and operation of modified Project components would create no significant new or substantially more severe impacts. In addition, the updates to the mitigation measures discussed above are not considerably different from those analyzed in the EIR.

Environmental Issue Area	Where Was the Impact Analyzed in the Prior Environmental Document(s)?	Do Proposed Changes Involve New Significant, or Substantially More Severe, Impacts?	What Are the Prior Mitigation Measures Addressing the Impacts?
V. CULTURAL RESOURCES. Would the project:			
a. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	Impact 3.5-1 (DEIR, pp. 3.5-16–18)	No	MM 3.5-1 (DEIR, pp. 3.5-17–18)
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	Impact 3.5-2 (DEIR, p. 3.5-19)	No	MM 3.5-1 (DEIR, pp. 3.5-17–18)
c. Disturb any human remains, including those interred outside the formal cemeteries?	Impact 3.5-4 (DEIR, pp. 3.5-20–21)	No	MM 3.5-2 (DEIR, pp. 3.5-20–21)

Discussion:

a. No Significant New or Substantially More Severe Impact. See impact discussion on pages 3.5-16 to -18 of the DEIR. The previously certified EIR concluded that potential impacts to significant historical resources would be less than significant with mitigation. The Project Site contains only three historical items that appear in database searches, none of which are eligible for listing in state or local historical resources registers (see Appendix I, Cultural Resources Report to Determine Section 106 Eligibility [09-27-2019] [pp. 14–16, Appendix 4]). No additional items were found during field surveys. A subsequent database search was conducted on May 16, 2019, and a site survey on May 20, 2019, for the Area of Implementation, and no additional historical items were found (Id.). As on the Project Site, MM 3.5-1 would ensure any unknown historical resources that may be inadvertently discovered on or in the Area of Implementation during construction would be handled properly and according to CEQA Guidelines. Therefore, no substantially new or more severe impacts to historical resources will occur.

b. No Significant New or Substantially More Severe Impact. See impact discussion on page 3.5-19 of the DEIR. The previously certified EIR concluded that potential impacts to archeological resources would be less than significant with mitigation. Field surveys on the Project Site and subsequently on the Area of Implementation did not reveal any archaeological resources (see Appendix I [p.15]). As on the Project Site, MM 3.5-1 would ensure any unknown archeological resources that may be inadvertently discovered on or in the Area of Implementation during construction would be handled properly and according to CEQA Guidelines. Therefore, no substantially new or more severe impacts to archeological resources will occur.

c. No Significant New or Substantially More Severe Impact. See impact discussion on pages 3.5-20 to -21 of the DEIR. The previously certified EIR concluded that potential impacts to human remains would be less than significant with mitigation. Field surveys on the Project Site and subsequently on the Area of Implementation did not reveal any human remains (see Appendix I [p.15]). However, as stated in the DEIR, humans have occupied Yolo County for more than 10,000 years, and it is not possible to predict where remains may be found. As on the Project Site, MM 3.5-2 would ensure any unknown human remains that may be inadvertently discovered on or in the Area of Implementation during construction would be handled properly and according to CEQA Guidelines.

Mitigation Measures: MMs 3.5-1 and 3.5-2.

Conclusion: With implementation of applicable mitigation measures identified in the previously certified EIR and listed above, implementation of modified Project components would create no significant new or substantially more severe impacts.

Environmental Issue Area	Where Was the Impact Analyzed in the Prior Environmental Document(s)?	Do Proposed Changes Involve New Significant, or Substantially More Severe, Impacts?	What Are the Prior Mitigation Measures Addressing the Impacts?
VI. ENERGY. Would the project:			
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or	Impact 3.7-4 (DEIR, pp. 3.7-27–31)	No	None

operation?			
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	Impact 3.7-4 (DEIR, pp. 3.7-27–31)	No	None
<p>Discussion:</p> <p>a. <u>No Significant New or Substantially More Severe Impact.</u> See impact discussion on pages 3.7-27 to -31 of the DEIR. The previously certified EIR concluded that potential impacts as result of wasteful energy consumption would be less than significant. Modified Project components do not create a permanent source of increased energy use. Farming operations, though not an element of the Project, will continue on the Area of Implementation as they had prior to implementation of the Project and modified Project components, thereby creating no new energy use. Energy used during construction will be temporary and short-term and come primarily from gasoline and diesel fuel associated with on- and off-road vehicle usage (DEIR, pp. 3.3-20; Table 3.7-10, p 3.7-29–30). By State and local mandate, the Project must conserve energy to the extent feasible during construction and operations and, as a result, vehicular usage will not exceed that expressly required for grading and soil excavation and relocation activities (Id., p. 3.7-30). Therefore, no substantially new or more severe impacts due to wasting energy will occur.</p> <p>b. <u>No Significant New or Substantially More Severe Impact.</u> See impact discussion on pages 3.7-26 and -27 to -31 of the DEIR. The previously certified EIR concluded that potential impacts resulting from conflicts with state or local energy plans, as listed in the DEIR on pages 3.7-8 to -14, would not occur—that the Project is “in compliance with all applicable Federal, State, and local regulations regulating energy usage ... [and] would also be in compliance with [] planning documents” (Draft EIR, p. 3.7-30–31). In addition to applicable local planning documents discussed in the DEIR, the Area of Implementation is subject to the <i>Yolo County Climate Action Plan</i>.¹⁷ This plan strives for a reduction in energy consumption across all sectors and states that projects consistent with the General Plan are assumed to have <i>de minimus</i> impacts from GHG emissions.¹⁸ The plan also recognizes the “valuable contributions made by farmland...in providing appositive alternative to more adverse land use patterns.”¹⁹ Modified Project components are consistent with the County General Plan, as discussed below in Land Use and Planning, and therefore are assumed to have <i>de minimus</i> impacts from GHG emissions and an overall less-than-significant impact under thresholds presented in the County <i>Climate Action Plan</i>, and will retain their use as farmland. To note, however, as described in Section 2.3 above, ongoing farming operation on the Area of Implementation are not part of the Project being considered in this Addendum. Thus, because modified Project components must adhere to the same energy conservation standards as the overall Project, which was found in the previously certified EIR to not conflict with applicable local planning documents, these Project changes also would not conflict with those energy plans. Therefore, no substantially new or more severe impacts as a result of conflicts with energy plans will occur.</p> <p>Mitigation Measures: None.</p> <p>Conclusion: Implementation of modified Project components would create no significant new or substantially more severe impacts; no mitigation is required.</p>			

¹⁷ *Yolo County Climate Action Plan*, March 15, 2011 (available online at <https://www.yolocounty.org/home/showdocument?id=18005>).

¹⁸ Id., p. 1.

¹⁹ Id., p. 31.

Environmental Issue Area	Where Was the Impact Analyzed in the Prior Environmental Document(s)?	Do Proposed Changes Involve New Significant, or Substantially More Severe, Impacts?	What Are the Prior Mitigation Measures Addressing the Impacts?
VII. GEOLOGY AND SOILS. Would the project:			
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: <ul style="list-style-type: none"> i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. ii. Strong seismic ground shaking? iii. Seismic-related ground failure, including liquefaction? iv. Landslides? 	Impact 3.6-1 (DEIR, pp. 3.6-14–15)	No	None
b. Result in substantial soil erosion or the loss of topsoil?	Impact 3.6-2 (DEIR, pp. 3.6-15–16)	No	MMs 3.6-1 and 3.6-2 (DEIR, pp. 3.6-15–16)
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	Impact 3.6-3 (DEIR, pp. 3.6-16–18)	No	MM 3.6-3 (DEIR, p. 3.6-18)
d. Be located on expansive soil, as defined in Table 18- 1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	Impact 3.6-4 (DEIR, pp. 3.6-18–19)	No	None
e. Have soils incapable of adequately	No Impact (Not Applicable)	No	None

supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	(DEIR, p. 3.6-14)		
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Impact 3.5-2 (DEIR, p. 3.5-19)	No	MM 3.5-1 (DEIR, pp. 3.5-17–18)

Discussion:

a. No Significant New or Substantially More Severe Impact. See impact discussion on pages 3.6-14 to -15 of the DEIR. The previously certified EIR concluded that potential impacts as a result of seismic activity or landslides would be less than significant because structures would be designed in accordance with the latest seismic design standards of the California building code and because the area, generally, has relatively low seismicity. Modified Project components do not involve development of structures, thus there can be no loss, injury, or death as a result of structural damage from seismic activities or landslides. Other types of risk of loss, injury, or death as a result of seismic activity on the Area of Implementation are likewise inapplicable as the parcels will stay primarily as they currently exist—flat farming land used for agricultural purposes with other related underlying infrastructural uses, such as the existing water main. Therefore, no substantially new or more severe impacts as a result of seismic activities or landslides will occur.

b. No Significant New or Substantially More Severe Impact. See impact discussion on pages 3.6-15 to -16 of the DEIR. The previously certified EIR concluded that potential impacts related to soil erosion and topsoil would be less than significant with mitigation. The Area of Implementation consists primarily of willows clay, Pescadero silty clay soils, willows clay alkali, and Marvin silty clay loam, with a small percentage of Rincon silty clay loam and Capay silty clay (Appendix F [Figure 3]; see Appendix E). These soil groups generally have a slow infiltration rate when thoroughly wet with a very slow rate of water transmission and a higher runoff potential (Appendix F [p.5]). Some activities that will occur during construction of modified Project components, such as grading, excavation, and the removal of vegetation cover, could cause a temporary increase in runoff, erosion, and sedimentation. But, implementation of MM 3.6-1 requiring a stormwater pollution prevention plan (SWPPP) will help prevent erosion and loss of topsoil and prevent or minimize the introduction of runoff into the local storm drainage systems. Likewise, implementation of MM 3.6-2 requiring best management practices that comport with applicable standards will further prevent runoff resulting in erosion. Largely though, construction activities that will occur on the Area of Implementation for modified Project components—excavating, grading, trenching, and relocating soil—are largely similar as those that have historically occurred in the area as part of standard farming practices. Therefore, no substantially new or more severe impacts to topsoil or as a result of erosion will occur.

c. No Significant New or Substantially More Severe Impact. See impact discussion on pages 3.6-16 to -18 of the DEIR. The previously certified EIR concluded that potential impacts resulting from unstable soil would be less than significant with mitigation. The DEIR found that the Project Site has low potential for landslides, lateral spreading, and liquefaction based on its soil groups and prior land use. But, to ensure that onsite fill soils are properly treated prior to construction, MM 3.6-3 requires a design-level geotechnical engineering report prior to final design approval of each phase of construction. The Area of Implementation, as a similar and adjacent area, shares soil qualities with the Project Site and likewise has low potential for landslides, lateral spreading, and liquefaction. This potential risk is reduced even further because no structural development is planned for the Area of Implementation. Thus, MM 3.6-3 is not required for modified Project components. Therefore, no substantially new or more severe impacts resulting from unstable soil will occur.

d. No Significant New or Substantially More Severe Impact. See impact discussion on pages 3.6-18 to -19 of the DEIR. The previously certified EIR concluded that potential impacts resulting from development located on expansive soils would be less than significant. Although the Project Site and, likewise, the Area of Implementation, may contain some expansive soil, modified Project components will not involve above-ground structural development that could be damaged as a result of these soils. Therefore, no substantially new or more severe impacts resulting from development on expansive soils will occur.

e. No Significant New or Substantially More Severe Impact. See impact discussion on page 3.6-14 of the DEIR. The previously certified EIR concluded that there would be no impact as a result of construction and use of septic tanks or wastewater disposal systems because none are planned as part of the project, which would be served by the City's wastewater treatment facility. The same conclusion is reached for modified Project components, with the design difference that the modified components require zero connectivity to wastewater treatment facilities as they would not create wastewater. Therefore, no substantially new or more severe impacts resulting from the use of septic tanks or wastewater treatment plants will occur.

f. No Significant New or Substantially More Severe Impact. See impact discussion on page 3.5-19 of the DEIR. The previously certified EIR concluded that potential impacts to unique paleontological resources and features would be less than significant with mitigation. Field surveys on the Project Site and subsequently on the Area of Implementation did not reveal any paleontological resources or unique geological features—only three potential historical resources were found, discussed above in Cultural Resources (see DEIR, Appendix F [pp. 12–14]); see also Appendix I [p.15]). As on the Project Site, MM 3.5-1 would ensure any unknown paleontological resources or unique geological features that may be inadvertently discovered on or in the Area of Implementation during construction would be handled properly and according to CEQA Guidelines. Therefore, no substantially new or more severe impacts to paleontological resources or unique geological features will occur.

Mitigation Measures: MMs 3.5-1, 3.6-1, and 3.6-2.

Mitigation Implementation Updates

MM 3.6-3 is not required for modified Project components because it mitigates potential impacts related to development; it is included here as mitigation already implemented by the Applicant/Developer. The measure requires a design-level geotechnical engineering report prior to final design approval of each phase of Project construction, to be submitted for review and approval to the City's Building Inspection Division prior to issuance of a building permit. This report was prepared in August 2019 and found no adverse geotechnical concerns that would preclude development (Appendix J, Design-Level Geotechnical Investigation [08-2019] [p.6]).

Conclusion: With implementation of applicable mitigation measures identified in the previously certified EIR and listed above, construction and operation of modified Project components would create no significant new or substantially more severe impacts.

Environmental Issue Area	Where Was the Impact Analyzed in the Prior Environmental Document(s)?	Do Proposed Changes Involve New Significant, or Substantially More Severe, Impacts?	What Are the Prior Mitigation Measures Addressing the Impacts?
VIII. GREENHOUSE GAS EMISSIONS. Would the project:			
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Impacts 3.7-1 and 3.7-2 (DEIR, pp. 3.7-21–24)	No	MM 3.7-1 (DEIR, p. 3.7-24)
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	Impact 3.7-3 (DEIR, pp. 3.7-25–27)	No	None
<p>Discussion:</p> <p>a. No Significant New or Substantially More Severe Impact. See impact discussion on pages 3.7-21 to -24 of the DEIR. The previously certified EIR concluded that potential impacts from greenhouse gas (GHG) emissions would be less than significant for construction-related GHGs, and less than significant with mitigation for operations-related GHGs. As discussed above in Air Quality, operational emissions from modified Project components are negligible and do not require mitigation. These less-than-significant operational emissions discussed in Air Quality include GHG emissions, which require structural development, energy consumption, and/or increases in vehicle trips—none of which occur here (see DEIR, p. 3.7-20). And, construction-related GHG emissions for modified Project components would not exceed the local, annual allowable GHG emissions for project construction (DEIR, p. 3.7-22). The Project, which would produce far more GHG emissions during construction than the modified Project components, falls well below the State threshold for any given year of construction (Id., Table 3.7-4, p. 3.7-21). GHG emissions from construction of modified Project components will derive primarily from vehicular usage and will be minimal in comparison to Project construction emissions because of the greatly reduced construction effort required (see Section 2.3 above and Appendix B for construction details for proposed Project modifications compared with construction details for the Project available in the DEIR, which involves worker commute trips, building construction, paving, architectural coatings, etc. [see pp. 3.3-17 and 3.7-21). The bulk of construction (grading/excavation to create the detention basins, overflow area, expanded agricultural buffer, and relocated water main/access road) will occur in the first phase of the Project’s construction within a 60-day window of time, during which the original Project would emit approximately 563 [metric tons] MT CO_{2e} without mitigation, which is far below the annual allowable amount of 1,100 MT CO_{2e} (Id.). Construction of modified Project components would emit just a small fraction of that total amount during this phase (see above), which, when added to Project construction emissions, still will not approach the allowable annual GHG construction emissions. Therefore, no substantially new or more severe impacts as a result of GHG emissions will occur.</p> <p>b. No Significant New or Substantially More Severe Impact. See impact discussion on pages 3.7-25 to -27 of the DEIR. The previously certified EIR concluded that potential impacts resulting from conflicts with applicable GHG plans and policies would be less than significant because both operational and construction GHG emissions would not exceed any applicable State or local allowances. The DEIR includes a myriad of applicable plans, policies, and regulations to which the Project complies (DEIR, pp. 3.7-7–3.7-18). Likewise, the modified Project components will also comply with applicable plans, policies, and regulations, because the associated GHG emissions fall well below that of the Project (see discussion above). The Area of Implementation also is subject to the <i>Yolo County Climate Action Plan</i> (see Energy) that strives for reductions in GHGs across all sectors. Modified Project components will</p>			

comply with this plan because they provide for the expansion of the Project’s agricultural buffer and, upon completion of construction, will allow the existing agricultural use of the Area of Implementation to continue. The *Yolo County Climate Action Plan* recognizes that agriculture contributes to a positive impact on regional GHG emissions.²⁰ Therefore, no substantially new or more severe impacts as a result of conflicts with GHG plans and policies will occur.

Mitigation Measures: None.

Conclusion: Implementation of modified Project components would create no significant new or substantially more severe impacts; no mitigation is required.

Environmental Issue Area	Where Was the Impact Analyzed in the Prior Environmental Document(s)?	Do Proposed Changes Involve New Significant, or Substantially More Severe, Impacts?	What Are the Prior Mitigation Measures Addressing the Impacts?
IX. HAZARDS AND HAZARDOUS MATERIALS. Would the project:			
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Impact 3.8-1 (DEIR, pp. 3.8-15–17)	No	MMs 3.8-1, 3.8-2, 3.8-3, 3.8-4, 3.8-5, and 3.8-6 (DEIR, pp. 3.8-16–17)
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	Impact 3.8-1 (DEIR, pp. 3.8-15–17)	No	MMs 3.8-1, 3.8-2, 3.8-3, 3.8-4, 3.8-5, and 3.8-6 (DEIR, pp. 3.8-16–17)
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	Impact 3.8-3 (DEIR, pp. 3.8-17–18)	No	None
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a	Impact 3.8-2 (DEIR, p. 3.8-17)	No	None

²⁰ *Yolo County Climate Action Plan*, p. iv.

significant hazard to the public or the environment?			
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	Impact 3.8-6 (DEIR, pp. 3.8-19–20)	No	None
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Impact 3.8-4 (DEIR, p. 3.8-18)	No	None
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	Impact 3.8-5 (DEIR, pp. 3.8-18–19)	No	None

Discussion:

a/b. No Significant New or Substantially More Severe Impact. See impact discussion on pages 3.8-15 to -17 of the DEIR. The previously certified EIR concluded that potential impacts resulting from the transport, use, disposal, or release of hazardous materials would be less than significant with mitigation. Potential impacts primarily were associated with construction and operation of structures and other structural Project components. However, modified Project components do not include any above-ground structural development, therefore mostly do not share in these potential impacts. There may be some concern for potential impacts associated with the use of petroleum-based products, such as oil, gasoline, and diesel fuel, in vehicles during excavation, grading, trenching, and relocation of soil, but these concerns are alleviated with implementation of mitigation measures included in the DEIR. Further, a Phase I Environmental Site Assessment was conducted for the Project Site and Area of Implementation that found no evidence of hazardous materials violations, discharges, or other contamination; soil sampling found no exceedance of allowable regulatory levels of agrichemicals, organochlorine pesticides, arsenic, and lead (Appendix C [p. 1]). Therefore, no substantially new or more severe impacts resulting from hazardous materials in the Area of Implementation will occur.

c/d/e/g. No Significant New or Substantially More Severe Impact. See impact discussion on pages 3.8-17 to -20 of the DEIR. The previously certified EIR concluded that potential impacts associated with proximity to schools, airports, known hazardous materials sites, or wildland fire areas would be less than significant because the Project Site would not be located within one-quarter mile of a proposed or existing school, within any identified airport safety zones or land use plans, on a site listed on regulatory databases as hazardous pursuant to Government Code Section 65962.5, or within an area where wildland fires are known to occur. The same conclusion holds true for the Area of implementation as it is located adjacent to the Project Site with the same existing landscape and historical agricultural use. Further, the Phase I Environmental Site Assessment found no physical or database evidence of hazardous materials or sites on either the Project Site or Area of Implementation (Appendix C [p. 1]). Therefore, no substantially new or more severe impacts associated with

proximity to schools, airports, known hazardous materials sites, or wildland fire areas will occur.

f. No Significant New or Substantially More Severe Impact. See impact discussion on page 3.8-18 of the DEIR. The previously certified EIR concluded that potential impacts to an adopted emergency response plan or emergency evacuation plan would be less than significant because the Project would not contain any elements that would impair or physically interfere with the applicable emergency management and evacuation plan—the City’s *Multi-Hazard Functional Planning Guide*. More specifically, the Project would not include any substantial modifications to the existing roadway system that could impact evacuation and emergency response. The Area of Implementation, largely, is under County jurisdiction and the applicable emergency plan is the *County of Yolo Emergency Operations Plan*.²¹ Modified Project components would not impair or physically interfere with this plan because they do not add any actions or development of the type that would obstruct emergency evacuation or response routes or roadways of any kind (see Transportation below). Therefore, no substantially new or more severe impacts to an adopted emergency plan will occur.

Mitigation Measures: MMs 3.8-1, 3.8-2, 3.8-3, 3.8-4, 3.8-5, and 3.8-6.

Mitigation Implementation Updates

MM 3.8-1 requires soil sampling and testing to detect agrichemicals. That sampling was done as part of the Phase I Environmental Site Assessment, and results were negative (Appendix C [p. 2]).

MM 3.8-6 requires soil sampling and testing of any soil stockpiles of an unknown source on the Project Site. The Applicant/Developer consulted with the former farmer for the Project Site and other persons knowledgeable about the land and determined that the sources of onsite soil stockpiles are known. Any soil present in a stockpile originated onsite and was moved around as part of normal farming operations. Therefore, sampling and testing is not required.

Conclusion: With implementation of applicable mitigation measures identified in the previously certified EIR and listed above, construction and operation of modified Project components would create no significant new or substantially more severe impacts. In addition, the updates to the mitigation measures discussed above are not considerably different from those analyzed in the EIR.

²¹ County of Yolo, *County of Yolo Emergency Operations Plan*, Revised December 2013 (available online at <https://www.yolocounty.org/home/showdocument?id=24660>).

Environmental Issue Area	Where Was the Impact Analyzed in the Prior Environmental Document(s)?	Do Proposed Changes Involve New Significant, or Substantially More Severe, Impacts?	What Are the Prior Mitigation Measures Addressing the Impacts?
X. HYDROLOGY AND WATER QUALITY. Would the Project:			
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	Impacts 3.9-1, 3.9-2, and 3.9-5 (DEIR, pp. 3.9-15–19, -22–23)	No	MMs 3.9-1 and 3.9-2 (DEIR, pp. 3.9-16, 3.9-19)
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	Impact 3.9-3 (DEIR, p. 3.9-19–20)	No	None
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: <ul style="list-style-type: none"> i. would result in substantial erosion or siltation on- or off-site; ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or iv. impede or redirect flood flows? 	Impacts 3.9-4 (DEIR, pp. 3.9-21–22)	No	MM 3.9-2 (DEIR, p. 3.9-19)
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	Impacts 3.9-6 and 3.9-7 (DEIR, p. 3.9-23–25)	No	MMs 3.9-3, 3.9-4, and 3.9-5 (DEIR, pp. 3.9-24–25)

e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	Impacts 3.9-1, 3.9-2, and 3.9-5 (DEIR, pp. 3.9-15–19, -22–23)	No	MMs 3.9-1 and 3.9-2 (DEIR, pp. 3.9-16, 3.9-19)
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Discussion:

a. No Significant New or Substantially More Severe Impact. See impact discussion on pages 3.9-15 to -19 and -22 to -23 of the DEIR. The previously certified EIR concluded that potential impacts to water quality and waste discharge requirements would be less than significant with mitigation. MM 3.6-1 requires submission and approval of a Storm Water Pollution Prevention Plan (SWPPP), and MM 3.9-1 requires preparation of a Spill Prevention Countermeasures and Control Plan (SPCC) to be submitted to and approved by the Yolo County Department of Community Services prior to commencement of construction activities. MM 3.9-2 requires preparation of a final stormwater and drainage plan identifying permanent stormwater control measures (see discussion below). As discussed above in Section 1.2, during the course of preparation of this design-level drainage plan it was determined that additional drainage would be needed to accommodate a 100-year storm event (discussed in more detail below) and would be needed to satisfy the CLOMR process. As a result, the originally proposed detention basin and agricultural buffer were proposed for expansion, along with an additional offsite detention basin and overflow area. These modifications to the Project are what gave rise to this Addendum. And, because modified Project components mostly occur within the County’s jurisdiction, the County requires new entitlements (see Sections 1.1 and 2.3). Essentially, modified Project components both help fulfill hydrological mitigation requirements and provide the final design for the Project’s drainage plan, as prescribed in the previously certified EIR (see DEIR, p. 3.9-17 and -22).

Thus, modified Project components mitigate for potential impacts resulting from a 100-year storm event and do not create new ones to water quality. During construction, the modified Project components will adhere to the Best Management Practices required by the SWPPP and SPCC. They also conform with City and County standard requirements for stormwater quality by providing storage during storm events to maintain existing water surface elevations within the project area and its surroundings during a 100-year storm event (discussed more below) (DEIR, p. 3.9-17). Comprehensive hydrological modeling shows that the proposed channelization of the flow of stormwater runoff will preclude negative impacts to water quality as a result of flooding (Appendix K, Preliminary Drainage Analysis [06-08-2020] [p. 8]). Modified Project components like the new and retrofitted storm drain pumps and progressive berm design further support the proper channelization of runoff. In addition, water quality measures set forth in the “Phase II Small MS4 General Permit, 2013-0001-DWQ,” dated February 5, 2013, adopted by the City will continue to be implemented to ensure a less than significant impact to water quality (DEIR, pp. 3.9-18–19). Therefore, no substantially new or more severe impacts related to water quality standards and waste discharge requirements will occur.

b. No Significant New or Substantially More Severe Impact. See impact discussion on pages 3.9-19 to -20 of the DEIR. The previously certified EIR concluded that potential impacts to groundwater supply would be less than significant because project design would promote infiltration of groundwater and facilitate recharge. The originally proposed offsite detention basin was identified in the EIR as promoting infiltration, and it continues in this capacity in its expanded state. Likewise, the additional detention basin and overflow area add even more opportunity for groundwater infiltration—providing more of a recharge benefit than with the Project’s preliminary stormwater drainage system. Therefore, no substantially new or more severe impacts to groundwater supply will occur.

c. No Significant New or Substantially More Severe Impact. See impact discussion on pages 3.9-21 to -22 of the DEIR. The previously certified EIR concluded that potential impacts resulting from alteration of the existing drainage pattern of the site or area would be less than significant because of the

proposed Project drainage system and adopted mitigation measures. Modified Project components present the final drainage plan required by MM 3.9-2 and serve to alleviate any potential drainage problems with quality and quantity of runoff water (see discussion above). Unlike the Project, modified Project components do not add impervious surfaces that could alter an existing drainage pattern. And, like the Project, they do not alter the course of a stream or river. Modified Project components do alter the existing drainage pattern of the site in that runoff will be directed into the offsite detention basins and spill into the overflow area during 100-year storm events (discussed below), but these alterations do not negatively affect the environment. In fact, they provide several benefits such as additional groundwater recharge (discussed above) and improved drainage for neighboring properties during storm events (discussed below). Therefore, no substantially new or more severe impacts resulting from alteration of the existing drainage pattern will occur.

d. No Significant New or Substantially More Severe Impact. See impact discussion on pages 3.9-23 to -25 of the DEIR. The previously certified EIR concluded that potential impacts resulting from flood hazards, tsunamis, or seiches would be less than significant with mitigation. The Project Site and Area of Implementation are not located in an area at risk of flooding from a tsunami or seiche, but they are in an area that is at risk of flooding as a result of infrequent storm events, known as 100-year storm events. The Project and modified Project components lie within a FEMA-designated 100-year floodplain, which is defined as an area with a one percent chance of being inundated with storm water due to an extreme storm event in any given 12-month period (Draft ER, pp. 3.9-4, 23). Put another way, such an extreme storm event has an average recurrence rate of once every 100 years. Modified Project components do not increase the risk for inundation as a result of a 100-year storm event. Hydrological modeling shows that they “do not impact” existing structures within the applicable flood plain (Appendix K [p. 8]). To further ensure no impacts to existing structures within the flood plain, the proposed soil stockpile, should it be required, will be located outside the stormwater flow of a 100-year storm event so that any changes to land contours as a result of the stockpile will not create additional runoff (see Section 2.2). As discussed above, these features manage the distribution of stormwater runoff to avoid inundation in any one area, with relatively rapid water drawdown from the overflow area once a storm subsides. Modeling shows that implementation of Project design elements included in MMs 3.9-3 and 3.9-5, such as raising the constructed portions of the Project Site above base flood elevation, and included here as the modified Project components would result in no impacts to existing structures during a 100-year storm event and have only a “de minimis” impact on water surface elevations in agricultural areas (Appendix K [p. 8]). These modeling results are used as the basis for the CLOMR, which is required in MM 3.9-4 (see Appendix A).

The Area of Implementation, like the Project Site, also is at risk of flooding as a result of a catastrophic failure of the Monticello Dam at Lake Berryessa (DEIR, p. 3.9-25). However, that risk remains less than significant and any flooding as a result would be diverted through the channelization prescribed as part of the Project and modified Project components, which improves on that included in the DEIR by providing additional stormwater detention and distribution (see explanation above). Therefore, no substantially new or more severe impacts resulting from flood hazards will occur.

e. No Significant New or Substantially More Severe Impact. This potential impact was newly added with the 2018 CEQA Guidelines Update and therefore was not directly analyzed in the previously certified EIR. Although not required, it is included here for modified Project components to provide the most up-to-date information to decision makers (refer to Section 1.1). See the water quality impact discussion on pages 3.9-15 to -19 and -22 to -23 of the DEIR. The Central Valley Water Quality Control Plan for the Sacramento River and San Joaquin River Basins (Basin Plan) is the applicable water quality control plan. It contains standards and measures for regional water quality inclusive of federal and State mandates (DEIR, p. 3.9-13). A violation of these standards may constitute a conflict with the Basin Plan. But, for modified Project components (and Project), potential impacts to water quality were found to be less than significant with mitigation, thereby resulting in no violations of water quality standards (see above discussion). As a result, the modified Project components would not conflict with the Basin Plan.

Currently, no sustainable groundwater management plan exists for the region. Modified Project components are located in the Yolo Subbasin within the larger Sacramento Valley Groundwater Basin (DEIR, p. 3.9-7) The Yolo Subbasin Groundwater Agency (YSGA), formed in 2017, acts as the Groundwater Sustainability Agency (GSA) for the Yolo Subbasin as required by the 2014 Sustainable Groundwater Management Act (SGMA). A Subbasin Groundwater Sustainability Plan is in the process of being developed by YSGA but does not currently exist. Therefore, no substantially new or more severe impacts as a result of conflicts with a water quality control plan or sustainable groundwater management plan will occur.

Mitigation Measures: MMs 3.6-1, 3.9-1, 3.9-2, 3.9-3, 3.9-4, and 3.9-5.

Mitigation Implementation Updates

MM 3.9-2 requires preparation of a final stormwater and drainage plan identifying permanent stormwater control measures. This plan was prepared by Rick Engineering Company on behalf of the Applicant/Developer and is attached as Appendix K.

MM 3.9-3 requires demonstration of protection from 100-year storm events for onsite Project installations, which is shown in the final stormwater and drainage plan included as Appendix K. This plan has been reviewed by County staff and their outside consultants and revised and finalized based on County feedback. The analysis shows that the Project's stormwater control measures, including those in the Area of Implementation, can accommodate displaced waters from the Project in from a 100-year storm event.

MM 3.9-4 requires the Applicant/Developer submit a CLOMR to FEMA for approval prior to issuance of any building permit by the City, which is included here as Appendix A. As a community participant, the City must review and approve the CLOMR for FEMA to approve. A second CLOMR is being prepared for, and will be submitted to, the County for their review and approval as a community participant for the Project elements in the Area of Implementation.

MM 3.9-5 requires a showing that building pads for Project features will be set above base flood elevation pursuant to CLOMR requirements prior to issuance of any building permit, which is shown here in the final stormwater and drainage plan (see Appendix K) and the CLOMR request (see Appendix A).

Conclusion: With implementation of applicable mitigation measures identified in the previously certified EIR and listed above, construction and operation of modified Project components would create no significant new or substantially more severe impacts. In addition, the updates to the mitigation measures discussed above are not considerably different from those analyzed in the EIR.

Environmental Issue Area	Where Was the Impact Analyzed in the Prior Environmental Document(s)?	Do Proposed Changes Involve New Significant, or Substantially More Severe, Impacts?	What Are the Prior Mitigation Measures Addressing the Impacts?
XI. LAND USE AND PLANNING. Would the project:			
a. Physically divide an established community?	Impact 3.10-1 (DEIR, p. 3.10-11)	No	None
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	Impact 3.10-2 (DEIR, p. 3.10-12–16)	No	None
<p>Discussion:</p> <p>a. <u>No New or Substantially More Severe Impact.</u> See impact discussion on page 3.10-11 of the DEIR. The previously certified EIR concluded that there was no potential impact relating to the division of an established community because the Project Site, as land proposed for development, would be situated between similarly developed land on two sides (to the south and the east), one side of which is developed as residential. Likewise, the Area of Implementation, as land proposed to remain predominantly agricultural, open space, flood-control facilities, is situated between land used similarly for agriculture (see Figure 2-1). The Area of Implementation and surrounding land uses are designated for Agriculture in the County General Plan and zoned as Agricultural Intensive (A-N) (see Section 2.2). No division of an established community will occur because modified Project components comport with the surrounding established community. Therefore, no substantially new or more severe impacts as a result of community division will occur.</p> <p>b. <u>No New or Substantially More Severe Impact.</u> See impact discussion on page 3.10-112 to -16 of the DEIR. The previously certified EIR concluded that potential impacts as a result of conflicts with a land use plan, policy, or regulation were less than significant because the Project would be consistent with the City General Plan, Zoning Code, and Yolo Local Agency Formation Commission (LAFCo) policies. Because the modified Project components occur primarily on land within the County’s jurisdiction, the County General Plan and County Zoning Code apply as well. Modified Project components are consistent with all applicable plans. The Area of Implementation will remain designated and zoned for agriculture, and will not conflict with Yolo County General Plan Policies that strive to preserve and maintain agricultural use in the County, including General Plan Policy LU 2.1 (to protect existing farm operations from impacts related to the encroachment of urban uses) and LU 3.1 (to direct residential growth to designated areas within the cities and within the growth boundaries of existing unincorporated communities). Moreover, the Applicant/Developer is adhering to an additional County plan for mitigation of farmland loss (see Section 2.3). Therefore, no substantially new or more severe impacts resulting from conflicts with land use plans and policies will occur.</p> <p>Mitigation Measures: None.</p> <p>Conclusion: Implementation of modified Project components would create no significant new or substantially more severe impacts; no mitigation is required.</p>			

Environmental Issue Area	Where Was the Impact Analyzed in the Prior Environmental Document(s)?	Do Proposed Changes Involve New Significant, or Substantially More Severe, Impacts?	What Are the Prior Mitigation Measures Addressing the Impacts?
XII. MINERAL RESOURCES. Would the Project:			
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	(DEIR pp. 3.6-13–14)	No	None
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	(DEIR pp. 3.6-13–14)	No	None
<p>Discussion: a/b. No Significant New or Substantially More Severe Impact. See impact discussion on pages 3.6-13 to -14 of the DEIR. The previously certified EIR concluded that there was no potential impact to mineral resources because no known mineral resources are located on the Project site or immediate vicinity. Likewise, the Area of Implementation, located within the immediate vicinity of the Project Site, does not contain known mineral resources, nor is it zoned by the County for mineral resources (see Section 2.2). Therefore, no substantially new or more severe impacts to mineral resources will occur.</p> <p>Mitigation Measures: None.</p> <p>Conclusion: Implementation of modified Project components would create no significant new or substantially more severe impacts; no mitigation is required.</p>			
Environmental Issue Area	Where Was the Impact Analyzed in the Prior Environmental Document(s)?	Do Proposed Changes Involve New Significant, or Substantially More Severe, Impacts?	What Are the Prior Mitigation Measures Addressing the Impacts?
XII. NOISE. Would the project result in:			
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	Impacts 3.11-1, 3.11-2, and 3.11-4 (DEIR, pp. 3.11-13–19, -20–22)	No	None
b. Generation of excessive groundborne vibration or groundborne noise	Impact 3.11-3 (DEIR, pp. 3.11-19–20)	No	None

levels?			
c. For a project located within the vicinity of a private airstrip or an airport land use plan or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	Impact 3.11-5 (DEIR, p. 3.11-22)	No	None

Discussion:

a. No Significant New or Substantially More Severe Impact. See impact discussion on pages 3.11-13 to -19 and 3.11-20 to -22 of the DEIR. The previously certified EIR concluded that potential impacts resulting from increases to ambient noise levels in excess of applicable standards were less than significant because increases in noise levels during construction (primarily from use of construction equipment) and operation (primarily from an increase in traffic and use of some Project facilities and mechanical equipment) would not exceed the City’s noise level standards.

The modified Project components, primarily, are subject to County noise standards because the Area of Implementation is largely under County jurisdiction. County noise standards are found in the County General Plan Health and Safety Element²² and either mirror or exceed the City standards presented in the DEIR (Tables 3.11-4 and 3.11-5, p. 3.11-8). During construction of modified Project components, noise levels would increase with the use of heavy equipment required to grade, excavate, and relocate soil. However, these noise levels would be comparable to those which currently exist on the Area of Implementation because activities such as grading, excavating, trenching, and soil relocation are part of current farming practice—albeit with increased intensity during certain phases of construction. Pursuant to the County General Plan’s equipment noise levels recommended for use in noise impact assessments, the heavy equipment necessary for these activities, such as tractors, backhoes, haulers, and excavators, range in maximum sound levels from 77 to 90 dBA (A-weighted decibels) from a distance of 50 feet. The County’s suggested maximum sound level for this type of heavy equipment during construction is 86 dBA, thereby making 86 dBA the threshold of significance for noise impacts to receptors (similar to the City’s threshold, see DEIR, p. 3.11-10). The nearest stationary noise receptor to the Area of Implementation are residences located more than 300 feet to the northeast of the proposed soil stockpile, off of Barry Road; the second nearest receptors are residences located approximately 490 feet to the east of the expanded detention basin, across Highway 113; and the third nearest receptor is a commercial structure located more than 500 feet to the southwest of the additional detention basin, off of County Road 99 (see DEIR, Figure 2.0-5, p. 2.0-23; see also Figure 2-1). Noise attenuates at a rate of approximately 6 dB per doubling of distance from the source (DEIR, p. 3.11-4). If the maximum sound level for construction equipment is 90 dBA at 50 feet, the maximum sound level at 100 feet would be 84 dBA, which is at least 2 dB below the threshold of significance. Thereby, sound levels during construction at 300 feet—the distance to the nearest receptors—would fall well below the threshold.

²² Yolo County General Plan Health and Safety Element, November 10, 2009, *County of Yolo 2030 Countywide General Plan* (available online at <https://www.yolocounty.org/home/showdocument?id=14463>), pp. HS-41–43, 56.

Further, construction of modified Project components would be constrained to the hours of 7:00 a.m. and 7:00 p.m. on Mondays through Fridays, and between the hours of 8:00 a.m. and 8:00 p.m. on Saturdays and Sundays, similar to the Project and in accordance with the City’s noise ordinance (DEIR, p. 3.11-18). Operational noise levels do not apply here because the operation of modified Project components as stormwater drainage and detention areas would not generate noise. Continuing farming and operation of the domestic water main are not a part of modified Project components (see Section 2.2); nevertheless, operational noise levels would not increase above their existing levels because farming practices on the Area of Implementation would remain the largely the same, if not slightly decrease as a result of the loss of farmland to the detention basin and other flood control components, and the water main operates underground with no detectable sound. Therefore, no substantially new or more severe impacts to ambient noise levels will occur.

b. No Significant New or Substantially More Severe Impact. See impact discussion on pages 3.11-19 to -20 of the DEIR. The previously certified EIR concluded that potential impacts resulting from excessive groundborne vibration or noise would be less than significant, because activities that may produce groundborne vibration or noise would occur temporarily only during construction and would be below the thresholds for causing damages to buildings (0.2 inches per second peak particle velocity [in/sec PPV]) or causing annoyance (0.1 in/sec PPV). Construction of the modified Project components will involve similar construction equipment and activities as the Project, such as grading and excavation, but will be temporary, of lesser intensity, and a shorter duration. Accordingly, as for the Project, groundborne vibration or noise will fall below the applicable thresholds. Therefore, no substantially new or more severe impacts resulting from excessive groundborne vibration or noise will occur.

c. No Significant New or Substantially More Severe Impact. See impact discussion on page 3.11-22 of the DEIR. The previously certified EIR concluded that potential impacts resulting from exposure to excessive air travel noise levels would be less than significant because the Project Site, though within a two-mile radius of the University Airport, was outside the threshold noise level contour. The Area of Implementation also is located outside this noise level contour and thusly will not expose onsite workers to excessive noise associated with air travel (DEIR, Figure 3.11-2, p. 3.11-25). Therefore, no substantially new or more severe impacts resulting from exposure to excessive air travel noise levels will occur.

Mitigation Measures: None.

Conclusion: Implementation of modified Project components would create no significant new or substantially more severe impacts; no mitigation is required.

Environmental Issue Area	Where Was the Impact Analyzed in the Prior Environmental Document(s)?	Do Proposed Changes Involve New Significant, or Substantially More Severe, Impacts?	What Are the Prior Mitigation Measures Addressing the Impacts?
XIV. POPULATION AND HOUSING. Would the Project:			
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other	Impact 3.12-1 (DEIR, pp. 3.12-6-7)	No	None

infrastructure)?			
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	Impact 3.12-2 (DEIR, p. 3.12-7)	No	None

Discussion:

a. No Significant New or Substantially More Severe Impact. See impact discussion on pages 3.12-6 to -7 of the DEIR. The previously certified EIR concluded that potential impacts associated with substantial population growth would be less than significant because the Project is consistent with regional growth projections and City requirements. Modified Project components do not involve structural development and therefore provide no impetus for growth, above and beyond providing infrastructural support for any growth associated with the Project. Therefore, no substantially new or more severe impacts associated with growth will occur.

b. No Significant New or Substantially More Severe Impact. See impact discussion on page 3.12-7 of the DEIR. The previously certified EIR concluded that there would be no impacts associated with displacement of people or housing because the Project would be developed on largely undeveloped land. Similarly, modified Project components will occur on undeveloped land that will remain in its agricultural or open space use. Therefore, no substantially new or more severe impacts associated with displacement will occur.

Mitigation Measures: None.

Conclusion: Implementation of modified Project components would create no significant new or substantially more severe impacts; no mitigation is required.

Environmental Issue Area	Where Was the Impact Analyzed in the Prior Environmental Document(s)?	Do Proposed Changes Involve New Significant, or Substantially More Severe, Impacts?	What Are the Prior Mitigation Measures Addressing the Impacts?
XV. PUBLIC SERVICES.			
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any the public services:			

Fire protection?	Impacts 3.13-1 and 3.13-2 (DEIR, pp. 3.13-13–14)	No	None
Police protection?	Impact 3.13-3 (DEIR, p. 3.13-15)	No	None
Schools?	Impact 3.13-4 (DEIR, pp. 3.13-15–16)	No	None
Parks?	Impact 3.13-5 (DEIR, pp. 3.13-16–17)	No	None
Other public facilities?	Impact 3.13-6 (DEIR, p. 3.13-18)	No	None

Discussion:

No Significant New or Substantially More Severe Impact. See impact discussion on pages 3.13-13 to -18 of the DEIR. The previously certified EIR concluded that potential impacts to public services would be less than significant because of service ratios determined by the City and payment of required impact fees to the City. The Area of Implementation, being primarily situated in the County’s jurisdiction, is serviced by the Springlake Fire Protection District, the Yolo County Sheriff’s Office, the Davis Joint Unified School District, and the County for public health and other County-wide services. Modified Project components will not add any structural development, population growth, or growth of any other kind that might impact public services above and beyond that of the Project because the Area of Implementation will largely remain in use as it currently exists—agricultural land and open space. Therefore, no substantially new or more severe impacts to public services will occur.

Mitigation Measures: None.

Conclusion: Implementation of modified Project components would create no significant new or substantially more severe impacts; no mitigation is required.

Environmental Issue Area	Where Was the Impact Analyzed in the Prior Environmental Document(s)?	Do Proposed Changes Involve New Significant, or Substantially More Severe, Impacts?	What Are the Prior Mitigation Measures Addressing the Impacts?
XVI. RECREATION.			
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	Impact 3.13-5 (DEIR, pp. 3.13-16–17)	No	None
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities?	Impact 3.13-5 (DEIR, pp. 3.13-16–17)	No	None

which might have an adverse physical effect on the environment?			
<p>Discussion: a/b. <u>No Significant New or Substantially More Severe Impact.</u> See impact discussion on pages 3.13-16 to -17 of the DEIR. The previously certified EIR concluded that potential impacts to existing recreational facilities would be less than significant because of payment of required impact fees to the City and new recreational facilities being built as part of the Project to service future residents. The construction of these new recreational facilities and associated potential environmental impacts were evaluated throughout the EIR as part of the Project and were found to have some significant and unavoidable impacts that the City subsequently found were outweighed by the economic, social, and other benefits of the Project (see Section 3.1). Modified Project components will not add any factors that might increase usage of recreational facilities and do not include the construction of new recreation facilities above and beyond that of the Project because the Area of Implementation will largely remain in use as it currently exists—agricultural land and open space use. Therefore, no substantially new or more severe impacts to or from recreation will occur.</p> <p>Mitigation Measures: None.</p> <p>Conclusion: Implementation of modified Project components would create no significant new or substantially more severe impacts; no mitigation is required.</p>			
Environmental Issue Area	Where Was the Impact Analyzed in the Prior Environmental Document(s)?	Do Proposed Changes Involve New Significant, or Substantially More Severe, Impacts?	What Are the Prior Mitigation Measures Addressing the Impacts?
XVII. TRANSPORTATION. Would the project:			
a. Conflict with a program plan, ordinance or policy establishing addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities	Impacts 3.14-7 and 3.14-8 (DEIR, p. 3.14-48)	No	None
b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	Impacts 3.14-1, 3.14-2, 3.14-3, 3.14-4, 3.14-5, 3.14-6, and 3.14-11 (DEIR, pp. 3.14-33–47, -51)	No	MM 3.14-1 (DEIR, pp. 3.14-44–46)
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)??	Impact 3.14-10 (DEIR, pp. 3.14-49–51)	No	MM 3.14-3 (DEIR, pp. 3.14-50–51)

d. Result in inadequate emergency access?	Impact 3.14-9 (DEIR, p. 3.14-49)	No	None
<p>Discussion:</p> <p>a. <u>No Significant New or Substantially More Severe Impact.</u> See impact discussion on page 3.14-48 of the DEIR. The previously certified EIR concluded that potential impacts resulting from conflicts with circulation plans, ordinances, or policies would be less than significant because local bus routes are not overly busy, the Project likely would not result in substantial numbers of peak-hour bus transit users, and the Project would add new and improve existing bicycle and pedestrian facilities. The County General Plan Circulation Element, applicable to the Area of Implementation because it primarily is within County jurisdiction, contains goals and policies addressing the circulation system.²³ Applicable goals and policies include those that promote bikeways, sidewalks, and trails (Goal CI-5 and Policies CI-5.1 to 5.19) and encourage accessible transit (Goal CI-6 and Policies CI-6.1 to 6.12). Also applicable to the Area of Implementation is the Yolo County Transportation District Short Range Transit Plan, which details proposed and planned growth for the regional transit network.²⁴ As discussed throughout this Addendum, modified Project components do not include structural development that would serve as an impetus for population growth or modify the existing circulation system in a way that might impact the County circulation system or conflict with an applicable plan. Therefore, no substantially new or more severe impacts resulting from conflicts with circulation plans will occur.</p> <p>b. <u>No Significant New or Substantially More Severe Impact.</u> This potential impact was newly revised with the 2018 CEQA Guidelines Update to require use of the vehicle-miles-traveled (VMT) standard by July 2020 instead of the level-of-service (LOS) standard that was used in the previously certified EIR. Analysis here relies on the standard provided in the previously certified EIR because, as discussed more below, modified Project components add nothing in the way of increased traffic or other transportation impacts, and the VMT standard is not required for use in CEQA documents until July 2020. See impact discussion on pages 3.14-33 to -47 and -51 of the DEIR. The previously certified EIR concluded that potential impacts resulting from conflicts with applicable traffic standards would be less than significant for intersections and freeways during operation and construction, but cumulatively considerable and significant and unavoidable when viewed in a cumulative project setting with mitigation. As discussed above, modified Project components do not include structural development that would serve as an impetus for population growth that might increase traffic so as to further degrade the LOS at any given intersection or freeway facility beyond Project projections. Therefore, no substantially new or more severe impacts resulting from conflicts with applicable traffic standards will occur.</p> <p>c. <u>No Significant New or Substantially More Severe Impact.</u> See impact discussion on pages 3.14-49 to -51 of the DEIR. The previously certified EIR concluded that potential impacts resulting from a substantial increase to circulation hazards because of Project design features would be significant and unavoidable with mitigation because increased Project traffic under cumulative project conditions would inhibit egress from the Project Site, and intersection improvements required to mitigate impacts may not occur. However, as discussed directly above, modified Project components will not exacerbate this impact, and thus require no mitigation. Therefore, no substantially new or more severe impacts resulting from a substantial increase to circulation hazards will occur.</p>			

²³ Yolo County General Plan Circulation Element, November 10, 2009, *County of Yolo 2030 Countywide General Plan* (available online at <https://www.yolocounty.org/home/showdocument?id=14467>).

²⁴ *Yolo County Transportation District Short Range Transit Plan, Fiscal Years 2014–2021* (available online at http://yolobus.com/pdf/YCTD_SRTP_FY_2014-2021_final_reduced.pdf).

d. No Significant New or Substantially More Severe Impact. See impact discussion on page 3.14-49 of the DEIR. The previously certified EIR concluded that potential impacts to emergency access would be significant and unavoidable with mitigation because the easement required to mitigate impacts may not be granted. However, as discussed above, modified Project components will not exacerbate this impact because they do not include an impetus for additional population growth or structural development that would require emergency access, and thus require no mitigation. Therefore, no substantially new or more severe impacts to emergency access will occur.

Mitigation Measures: None.

Conclusion: Implementation of modified Project components would create no significant new or substantially more severe impacts; no mitigation is required.

Environmental Issue Area	Where Was the Impact Analyzed in the Prior Environmental Document(s)?	Do Proposed Changes Involve New Significant, or Substantially More Severe, Impacts?	What Are the Prior Mitigation Measures Addressing the Impacts?
XVIII. TRIBAL CULTURAL RESOURCES. Would the Project:			
a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: <ul style="list-style-type: none"> i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant 	Impact 3.5-1 (DEIR, pp. 3.5-16–18)	No	MMs 3.5-1 and 3.5-2 (DEIR, pp. 3.5-17–18, -20–21)

<p>pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.</p>			
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Discussion:

a. No Significant New or Substantially More Severe Impact. See impact discussion on pages 3.5-16 to -18 of the DEIR and Cultural Resources above. The previously certified EIR concluded that potential impacts to tribal cultural resources would be less than significant with mitigation. The Project Site does not contain any known tribal cultural resources as defined in Public Resources Code section 21074 based on site surveys, database searches, and tribal consultation pursuant to Assembly Bill (AB) 52 requirements²⁵ and the CEQA Guidelines. An additional site survey and records search was conducted in May 2019 for the Project Site and Area of Implementation to determine Project eligibility for Section 106 consultation pursuant to the National Historic Preservation Act (see Appendix I [pp. 14–16]). Again, no known tribal cultural resources as defined in Public Resources Code section 21074 were identified by a cultural archaeologist that could be substantially adversely changed by the Project. As on the Project Site, MM 3.5-1 would ensure any unknown tribal cultural resources that may be inadvertently discovered on or in the Area of Implementation during excavation, grading, and soil relocation would be handled properly and according to CEQA Guidelines. Further, MM 3.5-2 would ensure any unknown human remains that may be inadvertently discovered on or in the Area of Implementation and may be of Native American ancestry would be handled properly and according to CEQA Guidelines. Therefore, no substantially new or more severe impacts to tribal cultural resources will occur.

Mitigation Measures: MM 3.5-1 and 3.5-2.

Conclusion: With implementation of applicable mitigation measures identified in the previously certified EIR and listed above, construction and operation of modified Project components would create no significant new or substantially more severe impacts.

²⁵ AB 52 consultation is statutorily required for projects for which a negative declaration, mitigated negative declaration, or an EIR is prepared (Pub. Resources Code, § 21080.3.1(b); Stats. 2114, ch. 532, § 11(c)). Such formal consultation is not required for addendums. Any recently conducted tribal consultation was in response to federal Section 106 requirements and not applicable to this CEQA review.

Environmental Issue Area	Where Was the Impact Analyzed in the Prior Environmental Document(s)?	Do Proposed Changes Involve New Significant, or Substantially More Severe, Impacts?	What Are the Prior Mitigation Measures Addressing the Impacts?
XIX. UTILITIES AND SERVICE SYSTEMS. Would the Project:			
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	Impacts 3.15-2 and 3.15-3 (DEIR, pp. 3.15-22–34, 37–38)	No	None
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	Impact 3.15-2 (DEIR, pp. 3.15-22–34)	No	None
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments?	Impact 3.15-1 (DEIR, pp. 3.15-6–7)	No	None
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	Impact 3.15-3 (DEIR, pp. 3.15-37–38)	No	None
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	Impact 3.15-3 (DEIR, pp. 3.15-37–38)	No	None
<p>Discussion: a/b/c/d. No Significant New or Substantially More Severe Impact. Potential impacts (a) and (d) were heavily revised with the 2018 CEQA Guidelines Update and therefore not fully analyzed in the previously certified EIR. Although not required, analysis is included here for modified Project components to provide the most up-to-date information to decision makers (refer to Section 1.1). See impact discussion on pages 3.15-6 to -38 of the DEIR. The previously</p>			

certified EIR concluded that potential impacts to infrastructure—water supply, wastewater treatment facilities, and solid waste facilities—would be less than significant because existing utilities can service the Project. The Area of Implementation is serviced by different utility providers than the Project Site. Although it is currently dry farmed, it does have access to well water. It also does not have a wastewater collection or conveyance system, as those systems are not required for its agricultural use. If activities conducted in the Area of implementation produced any significant amount of solid waste, the Area would be serviced by the same County landfill (Central Landfill) as the Project site (DEIR, p. 3.15-34).

As stated throughout this Addendum, the modified Project components do not include structural development that would increase utility usage. The majority of the Area of Implementation will remain active agricultural land and open space, as it has since at least 1937 (see Appendix C). Construction activities—grading, excavating, trenching, hauling, and soil relocation—are similar or same as those that occur during the course of normal agricultural operation, and will not require additional water service or produce additional wastewater or solid waste above and beyond that of the Project. Continued farming, while not a part of modified Project components, also will not increase usage of utilities as they largely will remain the same, if not slightly reduced as a result of the acreage for the detention basin and other flood control components being removed from agricultural use (see Section 2.2). Although the modified Project components require the relocation of the domestic water main, as explained further in Section 2.2, the relocated domestic water main was inspected and approved by the City. To ensure the negligible disruption to City water services, if any, the new water main will be fully operational and connected prior to the decommissioning of the existing water main. The City will issue all required entitlements upon approval to the Applicant/Developer prior to construction. No additional utilities will be relocated, constructed, or expanded as a result of modified Project components. No solid waste reduction regulations will be violated because no significant amount of solid waste will be generated by modified Project components, as the majority of their construction involves only soil moving. Therefore, no substantially new or more severe impacts to utilities will occur.

Mitigation Measures: None.

Conclusion: Implementation of modified Project components would create no significant new or substantially more severe impacts; no mitigation is required.

Environmental Issue Area	Where Was the Impact Analyzed in the Prior Environmental Document(s)?	Do Proposed Changes Involve New Significant, or Substantially More Severe, Impacts?	What Are the Prior Mitigation Measures Addressing the Impacts?
XX. WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:			
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	Not Applicable (See Impact 3.8-4 [DEIR, p. 3.8-18])	No	None
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	Not Applicable	No	None

c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	Not Applicable	No	None
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	Not Applicable (See Impact 3.8-5 [DEIR, pp. 3.8-18-19])	No	None
<p>Discussion: a/b/c/d. No Significant New or Substantially More Severe Impact. These potential impacts were newly added with the 2018 CEQA Guidelines Update and therefore not fully analyzed in the previously certified EIR. Although not required, analysis is included here for modified Project components to provide the most updated information to decision makers (refer to Section 1.1). The City of Davis and surrounding land within the County, including the Project Site and Area of Implementation, are in an area that is not designated as a very high fire hazard severity zone nor as a State Responsibility Area for wildfire protection.²⁶ The region is designated as a Local Responsibility Area, which means that the responsibility for wildfire suppression and protection rests primarily on local fire departments that provide a coordinated response (see DEIR, pp. 3.13-2-3). Because the modified Project components are not in or near state responsibility areas or lands classified as very high fire hazard severity zones, no substantially new or more severe impacts to wildfire risks in or near such areas will occur.</p> <p>Mitigation Measures: None</p> <p>Conclusion: Implementation of modified Project components would create no significant new or substantially more severe impacts; no mitigation is required.</p>			

²⁶ CalFire, *Fire Hazard Severity Zone Map, Yolo County*, Adopted November 7, 2007 (available online at https://osfm.fire.ca.gov/media/6855/fhszs_map57.pdf).

Environmental Issue Area	Where Was the Impact Analyzed in the Prior Environmental Document(s)?	Do Proposed Changes Involve New Significant, or Substantially More Severe, Impacts?	What Are the Prior Mitigation Measures Addressing the Impacts?
XI. MANDATORY FINDINGS OF SIGNIFICANCE.			
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	See DEIR: Sections 3.4, Biological Resources; 3.5 Cultural and Tribal Resources; and 3.6, Geology and Soils See also above: Biological Resources, Cultural Resources, Geology and Soils, and Tribal Cultural Resources	No	See DEIR: Sections 3.4, Biological Resources; 3.5 Cultural and Tribal Resources; and 3.6, Geology and Soils See also above: Biological Resources, Cultural Resources, Geology and Soils, and Tribal Cultural Resources
b. Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	See DEIR: Section 4.1, Cumulative Setting and Impact Analysis	No	See DEIR: Section 4.1, Cumulative Setting and Impact Analysis
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	See DEIR: Sections 3.3, Air Quality; 3.6, Geology and Soils; 3.7, Greenhouse Gases, Climate Change, and Energy; 3.8, Hazards and Hazardous Materials; 3.9, Hydrology and Water Quality; 3.11, Noise and Vibration; 3.12, Population and Housing; 3.13, Public Services and Recreation; 3.14, Transportation and	No	See DEIR: Sections 3.3, Air Quality; 3.6, Geology and Soils; 3.7, Greenhouse Gases, Climate Change, and Energy; 3.8, Hazards and Hazardous Materials; 3.9, Hydrology and Water Quality; 3.11, Noise and Vibration; 3.12, Population and Housing; 3.13, Public Services

	<p>Circulation; and 3.15, Utilities</p> <p>See also above: Air Quality, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Mineral Resources, Noise, Population and Housing, Public Services, Recreation, Transportation, and Utilities</p>		<p>and Recreation; 3.14, Transportation and Circulation; and 3.15, Utilities</p> <p>See also above: Air Quality, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Mineral Resources, Noise, Population and Housing, Public Services, Recreation, Transportation, and Utilities</p>
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Discussion: The previously certified EIR and this Addendum disclose all potential environmental impacts, their levels of significance, mitigation measures to reduce significance, and Project components that are required by law or as part of the project description.

a. No Significant New or Substantially More Severe Impact. Refer to discussion in Biological Resources, Cultural Resources, Geology and Soils, and Tribal Cultural Resources. Analysis in the checklist above demonstrates that modified Project components do not result in any substantially new or more severe impacts to the environment, habitat or population of a fish or wildlife species, plant, or animal community, rare or endangered plant or animal, or artifacts of history or prehistory.

b. No Significant New or Substantially More Severe Impact. Cumulative impacts are addressed in the previously certified EIR in Section 4.1. Because the modified Project components do not result in any substantially new or more severe cumulative impacts because, as demonstrated in the checklist above, they do not result in any new or substantially more severe project-level impacts.

c. No Significant New or Substantially More Severe Impact. Refer to discussion in Air Quality, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Mineral Resources, Noise, Population and Housing, Public Services, Recreation, Transportation, and Utilities. The analysis in the checklist above demonstrates that modified Project components do not result in any substantially new or more severe impacts to human beings, either directly or indirectly.

Mitigation Measures: See measures listed in each issue area discussion for those applicable to modified Project components.

Conclusion: With implementation of applicable mitigation measures identified in the previously certified EIR and listed above under each issue area, construction and operation of modified Project components would create no significant new or substantially more severe impacts to the areas included in the mandatory findings of significance categories.

APPENDICES

Appendix A, FEMA CLOMR Request (06-17-2019)

Appendix B, Soil Reclamation Plan

Appendix C, Phase I Environmental Site Assessment (without appendices) (10-16-2019)

Appendix D, Letter from Property Owner on Farming Practices (12-11-2019)

Appendix E, Agricultural Mitigation (04-2020)

Appendix F, Planning Level Survey Report for Bretton Woods Project (11-19-2019) and ESA Section 7 “No-Take” Memorandum (12-20-2019)

Appendix G, Aquatic Resources Delineation Report and Jurisdictional Determination (09-2019)

Appendix H, Section 401 Permit Application (without attachments) (11-08-2019)

Appendix I, Cultural Resources Report to Determine Section 106 Eligibility (09-27-2019)

Appendix J, Design-Level Geotechnical Investigation (08-2019)

Appendix K, Preliminary Drainage Analysis (06-08-2020)