Hillcrest Subdivision

Addendum #2 to the Sunshine Vista Phased Development Project Environmental Impact Report SCH#2017032041

prepared by

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Acronyms and Abbreviations

APN	Assessor's Parcel Number
AQMP	Air Quality Management Plan
BMPs	Best Management Practices
CEQA	California Environmental Quality Act
CO_2e	Carbon Dioxide Equivalent
CSCEHD	County of Santa Cruz Environmental Health Division
dBA	A-Weighted Decibels
DTSC	Department of Toxic Substances Control
EIR	Environmental Impact Report
ESL	Environmental Screening Level
FTA	Federal Transit Authority
GHG	Greenhouse Gas
Leq	Equivalent Sound Level
MBARD	Monterey Bay Air Resources District
MMRP	Mitigation Monitoring and Reporting Program
SCH	State Clearinghouse
SWPPP	Stormwater Pollution Prevention Plan
USFWS	United States Fish and Wildlife Service
VdB	Vibration decibels
VMT	Vehicle Miles Traveled
WMC	Watsonville Municipal Code

1 Introduction

This Addendum was prepared in accordance with the California Environmental Quality Act (CEQA) and the *State CEQA Guidelines*. This document has been prepared to serve as an Addendum to the previously certified Final Environmental Impact Report (EIR) (State Clearinghouse [SCH] # 2017032041) for the Sunshine Vista Phased Development Project (Original Project). The City of Watsonville (City) was the lead agency for the certified Final EIR and is the lead agency for the environmental review in this Addendum. This Addendum is the second addendum to the Final EIR. The City prepared an earlier addendum, the first addendum, to the Final EIR in February 2019. The first addendum addressed modifications related to site access and modifications to a noise mitigation measure contained in the Final EIR.

This Addendum #2 addresses the proposed modifications in relation to the previous environmental review document prepared for the Original Project. Section 15164 of the *State CEQA Guidelines* defines an Addendum as:

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

(b) An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.

(e) A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's findings on the project, or elsewhere in the record.

1.1 Background and Purpose of the EIR Addendum

The Final EIR for the Original Project (SCH # 2017032041) was certified on August 28, 2018, by the City of Watsonville City Council. The certified Final EIR consists of responses to public and agency comments received on the Draft EIR and the text of the Draft EIR revised based on responses to comments and other information. The certified Final EIR also includes a Mitigation Monitoring and Reporting Program (MMRP). Information and technical analyses from the certified Final EIR are utilized or referenced throughout this Addendum. Relevant passages from the certified Final EIR are cited and available for review at the City's Community Development Department offices located at, 250 Main Street, Watsonville, California 95076. In conjunction with certification of the Final EIR, the City Council also adopted a MMRP and approved the Original Project.

As approved in 2018, the Original Project includes the clean-up of the project site, including removal of all junk vehicles, trash, debris, and structures from past uses; soil-remediation; export of approximately 49,552 cubic yards of soil; temporary stormwater drainage measures; and regrading. The Original Project also includes development of the project site with 150 housing units, associated parking, utilities, stormwater management, and a public-access nature trail. Access to the residential development would be provided from a roadway extension from Loma Vista Drive, to the west of the project site. The project site is located at 511 Ohlone Parkway in Watsonville, Santa Cruz County, California, approximately 200 feet east of Ohlone Parkway and a half-mile east of State Route (Highway) 1. The project site is comprised of two legal parcels: Assessor's Parcel Number

(APN) 018-372-14 and APN 018-381-01. The project site has served as a car repair, maintenance, and disposal business since the 1960s. Specific known activities have included automotive dismantling, car crushing, car burning, automotive repair, automotive bodywork, automotive service, and storage of automotive waste fluid. Access for these past uses was provided via Errington Road.

The Original Project would be implemented in phases, with the site clean-up and remediation activities on APN 018-372-14 comprising phase one, and the remediation activities on APN 018-381-01 and residential development on APN 018-372-14 comprising phase two. Phase one was determined to be Categorically Exempt from CEQA, pursuant to Section 15330 of the State *CEQA Guidelines*. The City prepared a Notice of Exemption for phase one of the project, which allowed it to commence during the EIR preparation period. However, the EIR addressed the potential impacts of the overall project – including phase one – to fully evaluate the maximum potential impacts of the entire project.

The City first prepared an addendum to the Final EIR in February 2019. The 2019 addendum addressed modifications to the Original Project related to site access and modifications to a noise mitigation measure contained in the Final EIR. Specifically, the 2019 addendum addressed the addition of roundabout at the intersection of Loma Vista and Ohlone Parkway; the use of Errington Road as a secondary access for the project. It also addressed modifications to a noise impact mitigation measure in the Final EIR. The 2019 addendum is on file at the City's Community Development Department offices located at 250 Main Street, Watsonville, California 95076.

1.2 Basis for the Addendum

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

Section 15162(a) of the *State CEQA Guidelines* provides that a Subsequent EIR is not required unless the following occurs:

(1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

(2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

(3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:

   (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;

   (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;

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

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

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

An Addendum to the certified Final EIR for the Original Project is appropriate to address the proposed Modified Project because the proposed modifications to the approved Original Project do not meet the conditions of Section 15162(a) for preparation of a Subsequent EIR. The proposed Modified Project would not result in new or more severe impacts related to: 1) substantial changes to the Original Project which requires major revisions to the certified Final EIR; 2) substantial changes to the circumstances under which the Original Project are being undertaken which will require major revisions to the certified Final EIR; or 3) new information of substantial importance showing significant effects not previously examined.

The certified Final EIR and this Addendum to the certified Final EIR serve as informational documents to inform decision-makers and the public of the potential environmental consequences of approving the proposed Modified Project. This Addendum neither controls nor determines the ultimate decision for approval of the proposed Modified Project, described herein in Section 2, *Project Description*. The information presented in this Addendum to the certified Final EIR will be considered by the City of Watsonville City Council alongside the certified Final EIR prior to making a decision on the Modified Project.

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2 Project Description

The Modified Project would be located on the same project site as described and analyzed in the certified Final EIR for the Original Project. As described in the EIR, the project site is approximately 13 acres, consists of two assessor's parcels, and is located at 511 Ohlone Parkway in Watsonville, Santa Cruz County, California. Although the site address is Ohlone Parkway, the site is currently accessed from Errington Road. Figure 1 illustrates the location of the site within the region and Figure 2 shows the project site within the neighborhood context.

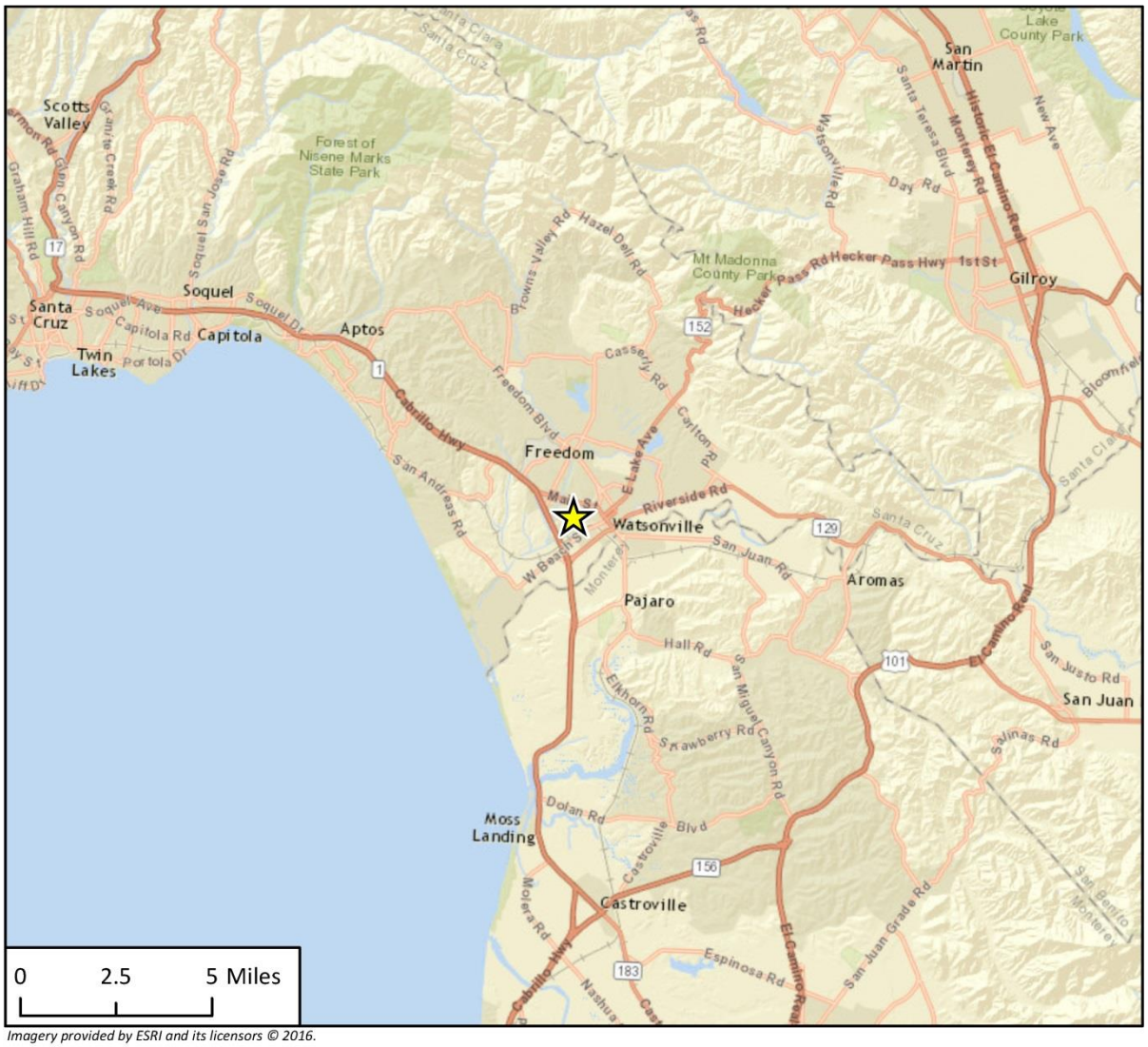
As described in Section 1, *Introduction*, the Modified Project consists of minor modifications to Original Project that was analyzed in the certified Final EIR and approved by the City of Watsonville City Council on August 28, 2018. As approved and analyzed in the certified Final EIR, the Original Project includes the clean-up of the project site, including removal of all junk vehicles, trash, debris, and structures from past uses; soil-remediation; export of approximately 49,552 cubic yards of soil. The export of soil includes removal of the approximately upper two feet of soil (approximately 33,195 cubic yards) due to contamination and the remaining due to grading to remove sloped terraces on the site. Removal of junk vehicles and debris from the site has since been completed, but export of soil has not been completed. The proposed minor modifications to the Original Project would include the use of more retaining walls to eliminate the need for extensive grading and soil export. The proposed modifications would also include export of shallow contaminated soils from the project site, but only a portion of the contaminated soils. Specifically, approximately 18,830 cubic yards of shallow contaminated soils would be kept on-site, and the rest would be exported off-site and disposed of a landfill certified to handle hazardous materials, in accordance with regulations, consistent with the Original Project. The shallow contaminated soils retained on-site would be buried in an "envelope" following the California Department of Toxic Substances Control's (DTSC) "Area of Containment" guidelines for remediation of metals in soils (DTSC 2008). Deeper soils without contaminant exceedances would be used to backfill and bury the envelope, creating a clean cap over the contaminated soils. Finally, a proposed new roadway and parking area for the project would be constructed over the burial area, creating an impervious cap over the area. The proposed soil burial area is shown on Figure 3 as roadway and surface parking with gray shading. The proposed Remediation Action Plan, consisting of a report prepared by Weber, Hayes & Associates in January 2021, is provided as Appendix A to this Addendum. The proposed Remediation Action Plan is pending approval from County of Santa Cruz Health Service Agency.

As approved and analyzed in the certified Final EIR, the primary and only vehicle access to the project site, excluding emergency access, would be from a new roadway entrance. This roadway would extend Loma Vista Drive east through a sloped area within the existing Sea View Ranch residential development west of the project site. The proposed minor modifications to the Original Project would provide a secondary vehicle access from existing Errington Road, which currently provides access to the project site, as well as several other parcels adjacent to and south of the project site. Turning movement onto Errington Road would be restricted to right-turns only from northbound Ohlone Parkway, thereby effectively making Errington a one-way street into the project site. Therefore, this scenario would also include modifying the existing road striping or median, or both, on Ohlone Parkway to reinforce prohibitions of left turns from Ohlone Parkway onto Errington Road. Existing road striping currently prohibits left turns onto Errington Road from Ohlone Parkway, but tire wear through the striping suggests that left turns do occur.

As approved and analyzed in the certified Final EIR, the project site would be developed with 150 housing units. The proposed minor modifications to the Original Project include reducing the density of the residential development to 144 units, which is six fewer units than approved in the Original Project and analyzed in the certified Final EIR. In addition to six fewer housing units, the Modified Project includes minor changes to the architectural design of the housing units. The reduction in density is accompanied by minor modifications to the design or layout of the development, such as the size and location of open space areas and stormwater management facilities on the site, alignment of on-site trails, alignment of internal circulation roads and utilities, and the use of more retaining walls to reduce extensive grading. However, the Modified Project design, including required grading, would be within the limits of disturbance for the Original Project analyzed in the certified Final EIR. In other words, while the Modified Project site plan is slightly different than the Original Project site plan, the Modified Project would not require disturbance in areas different from that of the Original Project. The conceptual site plan for the Modified Project is shown on Figure 4.

As approved and analyzed in the certified Final EIR, the project was called Sunshine Vista Phased Development Project. It should be stated to avoid confusion that the Modified Project also includes renaming the project to Hillcrest Subdivision. Renaming the project has no potential to cause or result in physical environmental impacts. Therefore, the renaming of the project is not discussed further in this Addendum.

Figure 1 Regional Location



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Project Location

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EIR Fig 2 Regional Location

Figure 2 Project Site Location

Figure 3 Soil Burial Plan

Figure 4 Project Site Plan

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3 Impact Analysis

A comparative analysis of the potential impacts associated with the proposed Modified Project and those of the approved Original Project analyzed in the certified Final EIR has been prepared using the CEQA checklist as a guide. This checklist is consistent with the format and environmental topics and questions of the checklist used in the Final EIR, but also includes recent updates to reflect the most recently adopted checklist provided in Appendix G of the 2021 *State CEQA Guidelines*. The checklist considers the full range of environmental issues subject to analysis under CEQA (in rows), and then poses a series of questions (in columns) aimed at identifying the degree to which the issue was analyzed in the certified Final EIR. The checklist also includes a column identifying whether the proposed Modified Project constitutes new information of substantial importance relative to each environmental issue. The questions posed in each column are described below.

Where was impact analyzed?

This column provides a cross-reference to the portions of the adopted certified Final EIR where information and analyses may be found relative to the environmental issue listed under each topic. The cross-references identified in this column correspond with page numbers and section numbers of the certified Final EIR.

Do proposed changes require major revisions to the certified Final EIR?

In accordance with Section 15162(a)(1) of the *State CEQA Guidelines*, this column indicates whether the proposed Modified Project would involve new significant environmental impacts or a substantial increase in the severity of previously identified significant impacts that, in turn, would require major revisions of the certified Final EIR.

Do new circumstances require major revisions to the certified Final EIR?

In accordance with Section 15162(a)(2) of the *State CEQA Guidelines*, this column indicates whether changes to the circumstances under which the Modified Project is undertaken or implemented have occurred that would involve new significant environmental impacts or a substantial increase in the severity of previously identified significant impacts that, in turn, would require major revisions of the certified Final EIR.

Is there any new information resulting in new or substantially more severe significant impacts?

In accordance with Sections 15162(a)(3)(A) and 15162(a)(3)(B) of the *State CEQA Guidelines*, this column indicates whether new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final EIR was certified, shows additional or substantially more severe significant impacts not discussed in the certified Final EIR.

Do mitigation measures included in the certified Final EIR address and/or resolve impacts?

In accordance with Sections 15162(a)(3)(C) and 15162(a)(3)(D) of the *State CEQA Guidelines*, this column indicates whether new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final EIR was certified, shows that mitigation measures or alternatives in the certified Final EIR would now be

feasible, or identifies new mitigation measures or alternatives not in the certified Final EIR that would reduce significant impacts, but which the applicant declines to adopt.

3.1 Aesthetics

	Where was Impact Analyzed in the EIR?	Do Proposed Changes Require Major Revisions to the EIR?	Do New Circumstances Require Major Revisions to the EIR?	Any New Information Resulting in New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?
Would the project:					
a. Have a substantial adverse effect on a scenic vista?	Pages 99 through 109	No	No	No	N/A
b. Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	Pages 99 through 109	No	No	No	N/A
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 a 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?	Pages 109 through 110	No	No	No	N/A
d. Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?	Pages 109 through 110	No	No	No	N/A

a. Would the project have a substantial adverse effect on a scenic vista?

b. Would the project substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

The Modified Project would be located at the same project site as the Original Project; the project location would be unchanged. As described in the certified Final EIR, the project site is not within a State designated scenic highway. The Modified Project would not add new components to the Original Project that would be visible from scenic vistas, because the Modified Project would develop the project site with similar sized residential structures. The Modified Project would involve less grading and more retaining walls compared with the Original Project; however, the retaining

walls would generally not be visible from public roadways or vantage points. Errington Road is an existing road and the modifications required to incorporate into secondary access to the project site would be at ground level and involve modifications to road materials and width. These modifications would not be visible from scenic vistas or obstruct scenic views. Therefore, the Modified Project would result in no new or more severe impacts to scenic vistas or designated State Scenic Highways beyond those identified in the previously certified Final EIR.

c. Would the project, 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 a 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?

The Modified Project would be located at the same project site as the Original Project; the project location would be unchanged. The project site has retained the same general appearance as was analyzed in the certified Final EIR for the Original Project. However, removal of debris, such as junked cars, has been completed. The Modified Project would not change the cleanup activities conducted as part of phase one of the project., but the Modified Project would change the remediation activities conducted as phase one of the project. As described above in Section 2, *Project Description*, the Modified Project would involve burying a portion of existing contaminated soils on-site. The buried soils would be beneath an internal circulation road constructed as part of the project. Therefore, because the soils would be buried, they would not be visible or result in changes to visual character. The addition of more retaining walls on-site than were analyzed in the certified Final EIR would not substantially change the appearance of development compared to the Original Project because the Original Project included some retaining walls. The Modified Project would include six fewer residential units than the Original Project. Therefore, development would be less dense and there would be slightly more landscaping and open space, which would be an improvement to the visual character of the site compared with the Original Project. The modifications to Errington Road involve changes to road materials and width. Modifications to the existing road striping on Ohlone Parkway would also be required to reinforce prohibitions of left turns from Ohlone Parkway onto Errington Road. These changes to Errington Road and Ohlone Parkway would be minimal and consistent with roadway features in the surrounding landscape. Therefore, the Modified Project would result in no new or more severe impacts to visual character and quality beyond those identified in the previously certified Final EIR.

d. Would the project create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?

The Modified Project would not add new sources or light or glare to the project site. The Modified Project would restrict construction activities to daylight hours, thereby avoiding the use of lighting at night during project construction, consistent with the Original Project. The Modified Project would reduce residential density by six units compared with the Original Project, which would result in a slight decrease in external lighting, such as lighting on porches. The Modified Project would not alter the Original Project in other ways with regard to light or glare. Therefore, the Modified Project would result in no new or more severe impacts to light and glare beyond those identified in the previously certified Final EIR.

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3.2 Agriculture and Forestry Resources

	Where was Impact Analyzed in the EIR?	Do Proposed Changes Require Major Revisions to the EIR?	Do New Circumstances Require Major Revisions to the EIR?	Any New Information Resulting in New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?
Would the project:					
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	Pages 381 through 382	No	No	No	N/A
b. Conflict with existing zoning for agricultural use or a Williamson Act contract?	Pages 381 through 382	No	No	No	N/A
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 by Government Code Section 51104(g))?	Pages 381 through 382	No	No	No	N/A
d. Result in the loss of forest land or conversion of forest land to non-forest use?	Pages 381 through 382	No	No	No	N/A
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 or conversion of forest land to non-forest use?	Pages 381 through 382	No	No	No	N/A

a. Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

b. Would the project conflict with existing zoning for agricultural use or a Williamson Act contract?

c. Would the project 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 by Government Code Section 51104(g))?

d. Would the project result in the loss of forest land or conversion of forest land to non-forest use?

e. Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?

As described in the certified Final EIR, there are no areas of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance on the project site; nor are there Williamson Act lands within the project site. As the project site does not constitute forest land and is not zoned for forest land or timber land production, the Original Project would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production, nor would it result in the loss of forest land or conversion of forest land to non-forest use. The Modified Project would be located at the same project site as the Original Project; the project location would be unchanged. Therefore, the Modified Project would also have no impact on Farmland or agricultural uses or forest land, consistent with the Original Project.

3.3 Air Quality

	Where was Impact Analyzed in the EIR?	Do Proposed Changes Require Major Revisions to the EIR?	Do New Circumstances Require Major Revisions to the EIR?	Any New Information Resulting in New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?
Would the project:					
a. Conflict with or obstruct implementation of the applicable air quality plan?	Pages 129 through 130	No	No	No	N/A
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?	Pages 134 through 135	No	No	No	N/A
c. Expose sensitive receptors to substantial pollutant concentrations?	Pages 135 through 136	No	No	No	N/A
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	Pages 136 through 137	No	No	No	N/A

a. Would the project conflict with or obstruct implementation of the applicable air quality plan?

As noted on page 127 of the certified Final EIR, a project would conflict with or obstruct implementation of the Monterey Bay Air Resources District's *Air Quality Management Plan* (AQMP) if it is inconsistent with the population growth assumptions included in the AQMP (MBARD 2008). As described in the certified Final EIR, the residential development included in the Original Project would generate approximately 570 additional residents in Watsonville. The 570-person residency was based on the average household size in Watsonville in 2017, when the certified Final EIR was prepared and then adopted, as described on EIR page 131. According to the California Department of Finance (2021), the average household size in Watsonville in January 2021 is approximately 3.69 people. The Modified Project would develop the project site with 144 housing units, which is six fewer housing units than the Original Project. Multiplying the proposed 144 housing units by the current average household size of 3.69 people would result in a project-site population of 532 people. Therefore, the Modified Project would not generate, directly or indirectly, additional population growth beyond what was analyzed for the Original Project in the certified Final EIR. The population growth resulting from the Modified Project would be consistent with the population growth assumptions included in the AQMP from 2008. MBARD adopted an updated AQMP in March 2017 (MBARD 2017). The growth resulting from the Modified Project would be consistent with growth envisioned in the updated and current AQMP. Therefore, the Modified Project would not

conflict with or obstruct the implementation of the AQMP. As the Modified Project would not conflict with or obstruct the implementation of applicable air quality plans, impacts would be less than significant and the same as the Original Project. The Modified Project would result in no new or more severe impacts related to conflicts with applicable air quality plans beyond those identified in the previously certified Final EIR for the Original Project.

b. Would the project 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?

The Modified Project would require additional construction activities for minor modifications to Errington Road for secondary access to the project site. However, the Modified Project would require less structural construction activities because six fewer housing units would be constructed compared to the Original Project. Additionally, the Original Project involved removal and hauling of more than 30,000 cubic yards of contaminated soil off-site. The Modified Project would requiring hauling off-site approximately 16,381 cubic yards, resulting in fewer haul trips compared to the Original Project. As shown in Table 9 on page 131 of the certified Final EIR, construction of the Original Project would result in a maximum of 20.8 pound per day of PM_{10} emissions. This is approximately 25 percent of the significance threshold set by the Monterey Bay Air Resources District (MBARD), which is 82 pounds per day. The additional operation of construction equipment necessary for the Errington Road modifications would be minimal, and not contribute to exceeding the 82 pounds per day threshold for PM10. MBARD has not established significance thresholds for other criteria pollutants. However, as the additional construction activities required under the Modified Project would be minimal, pollutant emissions would be commensurate and minimal. Operation emissions of the Modified Project would be less than the Original Project because there would be six fewer residential units on the project site, resulting in a corresponding decrease in emissions sources, such as vehicle trips. Impacts would be less than significant, and the Modified Project would result in no new or more severe impacts related to air quality impacts and criteria pollutant emissions beyond those identified in the previously certified Final EIR for the Original Project.

c. Would the project expose sensitive receptors to substantial pollutant concentrations?

The proposed modifications to Errington Road require for it to be suitable ingress to the project site would be in similar proximity to existing residences as the construction activities on the project site and analyzed in the certified Final EIR. As described above for checklist item 'b', the Modified project would result in less operational emissions than the Original Project, and construction emissions would be similar or slightly less than the Original Project. No new sensitive receptors have been constructed in proximity to the project site since certification of the Final EIR in August 2018. Therefore, the Modified Project would result in no new or more severe impacts related to exposure of sensitive receptors to air pollution beyond those identified in the previously certified Final EIR for the Original Project.

d. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

The Modified Project would result in no new or more severe impacts related to odors beyond those identified in the previously certified Final EIR for the Original Project. The Modified Project would not involve the use of construction equipment or materials that were not accounted for in the Original Project and analyzed in the EIR. The proposed modifications to Errington Road would occur

within the same proximity to existing residences as the construction activities anticipated and evaluated in the EIR. Therefore, no new odors or groups of people beyond those analyzed in the certified EIR for the Original Project would result from the Modified Project.

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3.4 Biological Resources

	Where was Impact Analyzed in the EIR?	Do Proposed Changes Require Major Revisions to the EIR?	Do New Circumstances Require Major Revisions to the EIR?	Any New Information Resulting in New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?
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 Wildlife or U.S. Fish and Wildlife Service?	Pages 152 through 167	No	No	No	Yes
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	Page166 through 172	No	No	No	Yes
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?	Pages 172 through 173	No	No	No	N/A
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	Page 173	No	No	No	N/A

		Where was Impact Analyzed in the EIR?	Do Proposed Changes Require Major Revisions to the EIR?	Do New Circumstances Require Major Revisions to the EIR?	Any New Information Resulting in New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?
e.	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	Page 174	No	No	No	N/A
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?	Page 382	No	No	No	N/A

a. Would the project 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 Wildlife or U.S. Fish and Wildlife Service?

b. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

c. Would the project 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?

The California Department of Fish and Wildlife's *California Natural Diversity Database* was queried on June 24, 2021, to determine if records of special-status species have been recorded in proximity to the project site since the certification of the Final EIR in August 2018. Similarly, the U.S. Fish and Wildlife Service's *Information for Planning and Consultation* system was queried on June 24, 2021, to identify any species listed, proposed for listing, or candidates for listing as threatened or endangered under the Federal Endangered Species Act within proximity to the project site that were otherwise not previously analyzed in the certified EIR for the Original Project. According to the *California Natural Diversity Database* (California Department of Fish and Wildlife 2021) and the *Information for Planning and Consultation* system (United States Fish and Wildlife Service 2021), no special-status species have been recorded in proximity to the project site that were not previously analyzed in the certified EIR. Vegetation cover on the project site has also not changed since the EIR was certified in August 2018.

The Modified Project would occur within the same project site as the Original Project, as well as within the existing roadway of Errington Road. Errington Road is an existing road that does not provide habitat for wildlife. Retaining a portion of the existing contaminated on-site and burial of

those soils on-site would have no additional impacts on wildlife or plants because they occur within the construction limits of the project. Because the Modified Project would not involve impacts to wildlife or associated habitats beyond what was previously analyzed in the certified EIR, and there are no wetlands or riparian habitat within existing Errington Road, the Modified Project would result in no new disturbance or impacts to special status species or their habitat, vegetation cover, riparian habitat or other sensitive natural communities, or wetlands. Mitigation measures identified in the certified Final EIR to reduce or avoid impacts to these biological resources would also be required for the Modified Project. These mitigation measures include:

- MM BIO-1 Pre-Disturbance Santa Cruz Tarplant Survey and Mitigation Planning
- MM BIO-2a. Worker Environmental Awareness Program
- MM BIO-2b. Determination of Appropriate Relocation Site(s)
- MM BIO-2c. Pre-Activity Western Pond Turtle Survey
- MM BIO-2d. Exclusion Fence
- MM BIO-2e. Prevention of Entrapment
- MM BIO-2f. Delineation of Work Area
- MM BIO-2g. Food Trash Removal
- MM BIO-2h. Biological Monitoring
- MM BIO-2i. Work Window
- MM BIO-2j. Documentation and Reporting
- MM BIO-2k. Pre-Construction California Red-Legged Frog Surveys
- MM BIO-2l. California Red-Legged Frog Habitat Avoidance and Minimization
- MM BIO-2m. On Site Riparian Enhancement
- MM BIO-3 Nesting Bird Avoidance
- MM BIO-4 Prevent the Spread of Invasive Species
- MM BIO-5. Riparian Woodland Protection and Restoration
- MM BIO-6. Riparian Ruderal Grassland Community Restoration
- MM BIO-7. Perennial Freshwater Marsh Community Restoration

With implementation of the required mitigation measures listed above, impacts of the Modified Project would be less than significant, consistent with impacts of the Original Project as identified in the certified EIR. The Modified Project would result in no new or more severe impacts on special-status species, riparian habitat and sensitive natural communities, or wetlands beyond those identified in the previously certified Final EIR for the Original Project.

As described below in Section 3.9, Hazards and Hazardous Materials, the Modified Project includes an Updated Remedial Action Plan that would involve burial of contaminated soils on-site in an envelope. The bottom of the envelope would be excavated to depths not exceeding 26 feet above mean sea level, which is approximately 15 feet above underlying groundwater. The approximately 15 feet of native soil between the bottom of the envelope and groundwater would provide for filtration of water moving through soil layers. Additionally, the envelope would be capped with

clean soil, and then an impervious surface associated with asphalt pavement for a proposed internal circulation roadway and surface parking would be constructed over top of the soil cap. The impervious service would prevent infiltration of precipitation into the soil cap, and thus the underlying buried contaminated soil envelope. Because infiltration of precipitation would be prevented, there would be very low potential for contaminants in the buried soil to become mobilized in water moving through the soils and leach into aquifers or into other areas of the project site or surrounding areas, such as the Watsonville Slough.

d. Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

The Modified Project would be located at the same project site as the Original Project; the project location would be unchanged. The Modified Project would include additional construction activities outside the project site boundaries, but these activities would be within the existing roadway of Errington Road. Errington Road does not provide migratory wildlife corridors nor is it a wildlife nursery site. Therefore, the Modified Project would result in no new disturbance or impacts on wildlife and fish movement or migratory wildlife corridors.

e. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

As described on page 174 of the certified EIR, Watsonville Municipal Code (WMC) Section 7-6.402 prohibits locating cut or fill slopes within the riparian corridor buffer along Watsonville Slough. Approximately 0.93 acre of the riparian buffer along Watsonville Slough would be permanently impacted during phase two of the Original Project. The Modified Project would not alter the design of the project in this area of the project site, and this approximately 0.93-acre area of riparian buffer would continue to be permanently impacted. However, the Modified Project would result in no new or additional impacts to the riparian buffer along Watsonville Slough. Consistent with the Original Project, impacts would be less than significant. Because the Modified Project would result in no new construction disturbance or operational activities in areas that were not previously analyzed in the certified EIR, other than existing Errington Road, the Modified Project would have no new or more severe impacts related to local policies or ordinances protecting biological resources.

f. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

The project site and Errington Road are not within a Habitat Conservation Plan or Natural Community Conservation Plan area. There would be no impact in this regard as a result of the Modified Project. As described in the certified EIR, the Original Project would also have no impact related to conflicts with an adopted plan.

3.5 Cultural Resources

	Where was Impact Analyzed in the EIR?	Do Proposed Changes Require Major Revisions to the EIR?	Do New Circumstances Require Major Revisions to the EIR?	Any New Information Resulting in New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?
Would the project:					
a. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	Pages 188 through 189	No	No	No	Yes
b. Cause a substantial adverse change in the significance of an archaeological pursuant to §15064.5?	Pages 188 through 189	No	No	No	Yes
c. Disturb any human remains, including those interred outside of formal cemeteries?	Page 191	No	No	No	N/A

a. Would the project cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

c. Would the project disturb any human remains, including those interred outside of formal cemeteries?

Cultural resources are site specific. The Modified Project would be located at the same project site as the Original Project; the project location would be unchanged. The project would involve modifications to Errington Road would occur within existing roadway. Because existing roadways have been previously disturbed and developed, the potential to encounter cultural resources or human remains is considered low. The proposed modifications to the site remediation plan would involve excavating an envelope for the burial of contaminated soils. However, the excavation would occur within areas where extensive grading would occur for the Original Project and analyzed in the certified Final EIR. Nonetheless, mitigation measures identified in the certified Final EIR to reduce or avoid impacts to potentially unknown cultural resources required for the Original Project would also be required for the Modified Project. These mitigation measures include:

- MM CR-1a. Archaeological Resources Construction Monitoring
- MM CR-1b. Unanticipated Discovery of Cultural Resources
- MM CR-2a. Worker Environmental Awareness Program Training
- MM CR-4. Native American Construction Monitoring

With implementation of the required mitigation measures listed above, impacts of the Modified Project would be less than significant, consistent with impacts of the Original Project as identified in the certified EIR. The Modified Project would result in no new or more severe impacts on cultural resources or human remains beyond those identified in the previously certified Final EIR for the Original Project.

3.6 Energy

	Where was Impact Analyzed in the EIR?	Do Proposed Changes Require Major Revisions to the EIR?	Do New Circumstances Require Major Revisions to the EIR?	Any New Information Resulting in New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?
Would the project:					
a. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	Pages 381 through 382	No	No	No	N/A
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	Pages 381 through 382	No	No	No	N/A

a. Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

b. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

The topic of Energy use was discussed in Section 5.3, *Energy Effects*, of the certified Final EIR. As described therein, the Original Project would involve the use of energy during site remediation and construction and subsequent occupancy of the residences. Energy use during phase one of the project and during the construction of phase two would be in the form of fuel consumption (e.g., gasoline and diesel fuel) to operate heavy equipment, light-duty vehicles, machinery, and generators for lighting. In addition, temporary grid power may also be provided to any temporary construction trailers or electric construction equipment. Construction of the Modified Project would result in less energy consumption compared to the Original Project because the Modified Project would result in fewer haul trips to remove contaminated soils from the site. Additionally, the Modified Project would require construction of six fewer residences compared with the Original Project. Because there would be six fewer residences, operational energy consumption would also be reduced. The Modified Project would therefore result in no new or more severe impacts related to wasteful, inefficient, or unnecessary consumption of energy resources; or the potential to conflict with state or local plans for renewable energy or energy efficiency beyond that identified in the previously certified Final EIR for the Original Project.

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3.7 Geology and Soils

	Where was Impact Analyzed in the EIR?	Do Proposed Changes Require Major Revisions to the EIR?	Do New Circumstances Require Major Revisions to the EIR?	Any New Information Resulting in New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?
Would the project:					
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:					
1. 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?	Pages 382 through 383	No	No	No	N/A
2. Strong seismic ground shaking?	Pages 202 through 203	No	No	No	N/A
3. Seismic-related ground failure, including liquefaction?	Pages 382 through 383	No	No	No	N/A
4. Landslides?	Pages 203 through 205	No	No	No	Yes
b. Result in substantial soil erosion or the loss of topsoil?	Pages 205 through 206	No	No	No	Yes
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?	Pages 203 through 205	No	No	No	Yes

		Where was Impact Analyzed in the EIR?	Do Proposed Changes Require Major Revisions to the EIR?	Do New Circumstances Require Major Revisions to the EIR?	Any New Information Resulting in New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?
d.	Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	Page 206	No	No	No	N/A
e.	Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	Pages 382 through 383	No	No	No	N/A
f.	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Pages 189 through 191	No	No	No	Yes

a. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

a.1 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?

a.2 Strong seismic ground shaking?

a.3 Seismic-related ground failure, including liquefaction?

a.4 Landslides?

Potential risks and susceptibility to earthquakes and seismicity is site specific and related to proximity of the project site to faults. The Modified Project would be located on the same project site as the Original Project analyzed in the certified EIR, and on existing Errington Road adjacent to the project site. Therefore, the proximity to known earthquake faults and the potential for fault rupture, seismic ground shaking, liquefaction, and landslides at the project site described for the Original Project in the certified EIR would also be applicable to the Modified Project. The Modified Project would not increase the number of structures or residents on the project site relative to the Original Project. In fact, the Modified Project would result in six fewer residential structures on the project site compared with the proposed project. Therefore, the Modified Project would not increase the number of people or structures potentially exposed to seismic risks compared to the Original Project. Consistent with the Original Project, implementation of Mitigation Measure GEO-2 Design-level Geotechnical Investigation and Final Grading Plan, would be required to reduce impacts related to landslides to less than significant. Compliance with Mitigation Measure GEO-2 would also

reduce impacts associated with seismic shaking affecting the proposed use of more retaining walls on the project site. With implementation of mitigation, the Modified Project would result in no new or more severe impacts beyond those identified in the previously certified Final EIR for the Original Project.

b. Would the project result in substantial soil erosion or the loss of topsoil?

The Modified Project would be located at the same project site as the Original Project; the project location would be unchanged. The Modified Project does not designate any new areas for construction or development that were not contemplated and analyzed for development in the certified Final EIR, except for modifications to existing Errington Road. Mandatory implementation of a Stormwater Pollution Prevention Plan (SWPPP) would be required for ground disturbance associated with Errington Road improvements, as well as the larger Modified Project, consistent with requirements of the Original Project. The SWPPP contains best management practices (BMPs) for preventing erosion and discharge of pollutants to waterbodies during construction. Therefore, the Modified Project would not result increased potential for soil erosion. Consistent with the Original Project, implementation of Mitigation Measure HWQ-1 Raingarden Operations and Maintenance Manual, would be required to ensure on-site stormwater management areas are maintained and function properly. Implementation of Mitigation Measure HWQ-1 would reduce impacts related to soil erosion to less than significant. With implementation of mitigation, the Modified Project would result in no new or more severe impacts beyond those identified in the previously certified Final EIR for the Original Project.

c. Would the project 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?

d. Would the project 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?

Geologic units and soil types are site specific. The Modified Project would be located at the same project site as the Original Project, plus on immediately adjacent existing Errington Road. The Modified Project does not designate any new areas for construction or development that were not contemplated and analyzed for development in the certified Final EIR, or that are not currently developed with existing Errington Road. Therefore, the potential for the Modified Project to result in unstable soils or to be damaged from expansive soils would be the same as the Original Project analyzed in the certified Final EIR. Mitigation Measure GEO-2 Design-level Geotechnical Investigation and Final Grading Plan, as described in the certified EIR for the Original Project, would also be required for the Modified Project. With implementation of mitigation, impacts would be less than significant. The Modified Project would result in no new or more severe impacts related to unstable or expansive soils beyond those identified in the previously certified Final EIR for the Original Project.

e. Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

Septic tanks or alternative wastewater disposal systems would not be utilized for the Modified Project. Therefore, no geological impact due to wastewater disposal systems would occur. As

described in the certified EIR, the Original Project would also have no impacts related to septic tanks or alternative wastewater disposal systems.

f. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Paleontological resources and unique geologic features are site specific. The Modified Project would be located at the same project site as the Original Project; the project location would be unchanged. The project would involve modifications to Errington Road would occur within existing roadway. Because existing roadways have been previously disturbed and developed, the potential to encounter paleontological resources is considered low. The proposed modifications to the site remediation plan would involve excavating an envelope for the burial of contaminated soils. However, the excavation would occur within areas where extensive grading would occur for the Original Project and analyzed in the certified Final EIR. Nonetheless, the mitigation measure identified in the certified Final EIR to reduce or avoid impacts to potentially unknown paleontological resources required for the Original Project would also be required for the Modified Project. This mitigation measure is identified as: MM CR-2b. Unanticipated discovery of paleontological resources. With implementation of the required mitigation measure, listed above, impacts of the Modified Project would be less than significant, consistent with impacts of the Original Project as identified in the certified EIR. The Modified Project would result in no new or more severe impacts on paleontological resources beyond those identified in the previously certified Final EIR for the Original Project.

3.8 Greenhouse Gas Emissions

	Where was Impact Analyzed in the EIR?	Do Proposed Changes Require Major Revisions to the EIR?	Do New Circumstances Require Major Revisions to the EIR?	Any New Information Resulting in New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?
Would the project:					
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Pages 224 through 228	No	No	No	N/A
b. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	Pages 224 through 228	No	No	No	N/A

a. Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

b. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

As described in the certified Final EIR, construction of the Original Project would generate approximately 54.8 metric tons of greenhouse gas (GHG) emissions per year, measured as carbon dioxide equivalent (CO_2e), amortized over the life of the project. The minor modifications to Errington Road for secondary site access would result in additional construction not accounted for in the certified Final EIR. However, the proposed site remediation plan would require fewer haul trips to remove contaminated soils from the project site because the Modified Project would retain approximately 18,830 cubic yards of soils on-site that would be hauled off-site under the Original Project. Further, the Modified Project would reduce residential construction because six fewer housing units would be constructed compared with the Original Project. Therefore, the Modified Project would decrease construction GHG emissions compared with the Original Project.

Because residential development would be reduced by six units, operation of the Modified Project would decrease operation GHG emissions compared with the Original Project. Operational GHG emissions would decrease because fewer units would result in less energy consumption and a small residential population. A smaller residential population would result in a corresponding decrease in vehicle miles traveled, and therefore a reduction in mobile-source GHG emissions. Therefore, the Modified Project would result in no new or more severe impacts related to GHG emissions beyond those identified in the previously certified Final EIR for the Original Project.

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3.9 Hazards and Hazardous Materials

	Where was Impact Analyzed in the EIR?	Do Proposed Changes Require Major Revisions to the EIR?	Do New Circumstances Require Major Revisions to the EIR?	Any New Information Resulting in New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?
Would the project:					
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Pages 236 through 237	No	No	No	N/A
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?	Page 237 and pages 239 through 340	No	No	No	N/A
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?	Pages 238 through 239	No	No	No	N/A
d. Be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	Pages 238 through 239	No	No	No	N/A
e. For a project located in 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 or excessive noise for people residing or working in the project area?	Page 236	No	No	No	N/A

		Where was Impact Analyzed in the EIR?	Do Proposed Changes Require Major Revisions to the EIR?	Do New Circumstances Require Major Revisions to the EIR?	Any New Information Resulting in New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?
f.	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Page 236	No	No	No	N/A
g.	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	Page 240	No	No	No	N/A

a. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

The Modified Project would not modify the operational uses of the Original Project, which consist of residential development. Compliance with regulations pertaining to the routine transport, handling, and disposal of hazardous materials would be mandatory and minimize impacts of upset or hazards, regardless of the potential implementation of the Modified Project or Original Project. Therefore, the Modified Project would result in no new or more severe impacts beyond those identified in the previously certified Final EIR for the Original Project.

b. Would the project 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?

c. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?

d. Would the project be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

As described in the certified EIR, there were no known hazardous material sites of lists compiled pursuant to Government Code Section 65962.5 when the Final EIR was prepared, but the project site does contain hazardous waste consisting of contaminated soils. The project site is also within 0.25 mile of a school. In order to determine if known hazardous materials contamination at the project site has been identified since certification of the Final EIR in August 2018, the following databases and listings compiled pursuant to Government Code Section 65962.5 were queried on June 25, 2021:

- United States Environmental Protection Agency
    - Superfund Enterprise Management System database (2021a)

    - Comprehensive Environmental Response, Compensation, and Liability Information System database (2021b)
- State Water Resources Control Board
    - GeoTracker database (2021) search for leaking underground storage tanks and other cleanup sites
- Department of Toxic Substances Control
    - EnviroStor database (2021a) for hazardous waste facilities or known contamination sites
    - Hazardous Waste and Substances Site List (Cortese) (2021b)

According to these databases, no hazardous material sites have been identified on or within proximity to the project site since certification of the Final EIR in August 2018. The Modified Project would occur on the same project site as the Original Project, within the same approximate footprint as the Original Project. The Modified Project would also involve construction activities on Errington Road adjacent to the project site analyzed in the EIR. Errington Road is not identified as hazardous site in the aforementioned databases.

As described on page 240 of the certified Final EIR, the Original Project would remediate existing on-site soil contamination in accordance with voluntary Remedial Action Agreement between the applicant of the Original Project and the Santa Cruz County Environmental Health Services, dated August 19, 2016. The 2016 Remedial Action Agreement involved removal of approximately 33,195 cubic yards of subsurface debris and contaminated soils during phase one of the Original Project, and additional soil sampling and removal of contaminated soils, as determined necessary, during phase two of the Original Project. Effectively, the 2016 Remedial Action Agreement would remove from the project site soils that are considered contaminated because they exceed environmental screening levels (ESLs).

The Modified Project includes revised or modified remedial actions, detailed in an Updated Remedial Action Plan that was submitted to the County of Santa Cruz Environmental Health Division (CSCEHD) on February 10, 2021. The Updated Remedial Action Plan is currently under review by CSCEHD, but the City has determined that the contents of the Updated Remedial Action Plan are unlikely to change and will be approved, as suggested by the CSCEHD circulating public notice of the Updated Remedial Action Plan on June 25, 2021.

The goal of proposed remedial action will be to reduce, minimize, or eliminate potential future exposure of humans to near surface soil contamination. Specifically, the proposed remedial actions would include excavating impacted shallow soils (less than 2 feet below ground surface) and deeper areas with known contamination and burying these soils in an on-site envelope following appropriate state guidance. Deeper soils, if determined to be absent of elevated concentrations of contaminants of concern, would be used to backfill over the envelop as a "soil cap."

The Updated Remedial Action Plan includes requirements to record a deed restriction for the project site with an *Environmental Site Management Plan*, which would require that the thickness of the fill/soil cap cover be regularly checked and maintained as necessary to provide the protective cover that serves to eliminate potential exposure to any underlying impacted soil. Additionally, impervious asphalt pavement for a proposed internal circulation roadway and surface parking would be constructed over top of the soil cap. The impervious service would prevent infiltration of precipitation into the soil cap, and thus the underlying buried contaminated soil envelope. Because

infiltration of precipitation would be prevented, there would be very low potential for contaminants in the buried soil to become mobilized in water moving through the soils and leach into aquifers or into other areas of the project site or surrounding areas, such as the Watsonville Slough. Additionally, the burial envelope would be constructed with a 15-foot thick leaching protection zone. The protection zone would consist of approximately 15 feet of native soils that would serve as natural filter between the bottom of the burial envelope and deep groundwater aquifers. As discussed on page 248 of the certified Final EIR, groundwater elevation on the project site is assumed to be 11 feet above mean sea level based on previous soil borings. The bottom of the burial envelope would not exceed depths of 26 feet above sea level, providing the approximately 15 feet of native soils as the protection zone.

Completion of remedial activities in the Updated Remedial Action Plan would ensure that the Modified Project would have no long-term connectivity between residual contamination in the subsurface to onsite residents, workers, visitors, and/or the environment. Soils would be buried and not be emitted as dust to nearby schools or other receptors. The Modified Project would improve existing conditions because currently there are no measures in place to prevent erosion of contaminated soils or leaching of contaminated soils. Therefore, consistent with findings of the certified EIR for the Original Project, the Modified Project would also have no new or more severe impacts related to hazards, hazardous waste sites or hazardous emissions in proximity to schools. Impacts would be less than significant.

e. For a project located in 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 or excessive noise for people residing or working in the project area?

As described on page 236 of the certified Final EIR, the project site is located within two miles of the Watsonville Municipal Airport, but it is not within a safety zone associated with this airport. Therefore, consistent with the Original Project and findings of the certified Final EIR, the Modified Project would also have no impacts related to safety hazards pertaining to airports.

f. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

The Modified Project would not change the secondary vehicle access restricted for emergency response vehicles. However, the Modified Project would provide additional vehicle access to the project site via Errington Road. Errington Road would ordinarily function as ingress to the site only, but it could be used for egress during an emergency warranting evacuation, such as a wildfire. This would be a slightly beneficial impact relative to the Original Project. The Modified Project would therefore have no new or more severe impacts beyond those identified in the previously certified Final EIR for the Original Project.

g. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

The Modified Project would decrease the number of structures or residences relative to the Original Project and would be located at the same project site as the Original Project analyzed in the certified Final EIR. Therefore, the Modified Project would result in no new or more severe impacts related to exposure to wildlife fire hazards beyond those identified in the previously certified Final EIR for the Original Project.

3.10 Hydrology and Water Quality

	Where was Impact Analyzed in the EIR?	Do Proposed Changes Require Major Revisions to the EIR?	Do New Circumstances Require Major Revisions to the EIR?	Any New Information Resulting in New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?
Would the project:					
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	Pages 252 through 254	No	No	No	Yes
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	Pages 256 through 257	No	No	No	N/A
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:					
(i) Result in substantial erosion or siltation on- or off-site	Pages 254 through 256	No	No	No	Yes
(ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site	Pages 254 through 256	No	No	No	Yes
(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	Pages 254 through 256	No	No	No	Yes

	Where was Impact Analyzed in the EIR?	Do Proposed Changes Require Major Revisions to the EIR?	Do New Circumstances Require Major Revisions to the EIR?	Any New Information Resulting in New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?
(iv) Impede or redirect flood flows?	Pages 383 through 384	No	No	No	N/A
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	Pages 383 through 384	No	No	No	N/A
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	Pages 252 through 254	No	No	No	Yes

a. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

c. Would the project 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:

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?

e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

The Modified Project would be located on the same site as the Original Project. Hydrological conditions related to soils and hydrology on and around the site have not changed since certification of the Final EIR. Like the Original Project, a stormwater pollution prevention plan (SWPPP) would also be required for construction of the Modified Project. The SWPPP would include best management practices (BMPs) to prevent soil erosion and resultant sedimentation of streams and surface waters during construction. The SWPPP would also contain BMPs to prevent leaking of pollutants such as oil, grease, and chemicals from construction equipment from discharging to surface waters or groundwater. With mandatory implementation of the SWPPP and associated BMPs, construction of the Modified Project would not violate water quality standards or waste discharge requirements, or otherwise substantially degrade water quality.

As described above in 3.9, *Hazards and Hazardous Materials*, the Modified Project includes an Updated Remedial Action Plan that would involve burial of contaminated soils on-site in an envelope. The bottom of the envelope would be excavated to depths not exceeding 26 feet above mean sea level, which is approximately 15 feet above underlying groundwater. The approximately 15 feet of native soil between the bottom of the envelope and groundwater would provide for filtration of water moving through soil layers. Additionally, the envelope would be capped with

clean soil, and then an impervious surface associated with asphalt pavement for a proposed internal circulation roadway and surface parking would be constructed over top of the soil cap. The impervious service would prevent infiltration of precipitation into the soil cap, and thus the underlying buried contaminated soil envelope. Because infiltration of precipitation would be prevented, there would be very limited potential for contaminants in the buried soil to become mobilized in water moving through the soils and leach into aquifers or into other areas of the project site or surrounding areas, such as the Watsonville Slough. Excess contaminated soil that would not fit within the envelope would be hauled off-site and disposed of at an appropriate landfill in accordance with regulatory requirements. Therefore, the Updated Remedial Action Plan that is part of the Modified Project would protect surface water and groundwater from existing contaminated soil on the project site.

As described on page 257 of the certified Final EIR, at full buildout of the Original project, the total impervious area on the project site would be 264,188 square feet. Implementation of the Modified Project would result in approximately 257,760 square feet of impervious surface on the project site. Therefore, operation of the Modified Project would decrease the amount of impervious surface on the project site compared with the Original Project. The Original Project includes onsite raingardens to treat stormwater runoff, and the Modified Project would also utilize raingardens to treat stormwater runoff. A segment of Errington Road would be converted from gravel surface to paved asphalt surface under the Modified Project, resulting in an incremental increase in impervious surface off-site. Consistent with the Original Project, the Modified Project would be required to comply the City of Watsonville Excavations, Grading, Filling, and Erosion Control Ordinance (WMC Chapter 7-6), which contains requirements for erodible areas, slopes, concentrated runoff, and building runoff, and BMPs for erosion control.

Mitigation Measure HWQ-1, Raingarden Operations and Maintenance Manual, required for the Original Project would also be required for the Modified Project. As described in the certified EIR, implementation of Mitigation Measure HWQ-1 would mandate that the onsite raingardens be properly maintained to retain their stormwater storage and treatment capabilities. With implementation or the required mitigation listed above, impacts of the Modified Project would be less than significant, consistent with impacts of the Original Project, as identified in the certified EIR. The Modified Project would result in no new or more severe impacts related to water quality and wastewater discharge requirements or polluted runoff beyond those identified in the previously certified Final EIR for the Original Project. Because the Modified Project would prevent erosion and contamination of water during construction and operation, it would not conflict with water quality control plans.

b. Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

As described above, the Modified Project would result in an incremental increase in impervious surface associated with the proposed modifications to Errington Road but a decrease of impervious surface on the project site. These additional impervious areas on Errington Road would reduce the infiltration capacity of the area adjacent to the project site. However, as described on pages 256 and 257 of the certified Final EIR, the major water-bearing groundwater aquifers within the Watsonville Planning Area are recharged within zones north of the City, away from the project site. The Modified Project would reduce the number of residential units or associated population relative to the Original Project and analyzed in the certified Final EIR. Therefore, the Modified Project would result in no increases in long-term water demand. Impacts on groundwater supplies and

groundwater recharge would be less than significant, consistent with the Original Project. The Modified Project would therefore have no new or substantially more severe significant impacts beyond those previously identified for the Original Project in the certified Final EIR.

c. *Would the project 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:*

   i. *Result in substantial erosion or situation on- or off-site?*

   ii. *Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?*

The Modified Project does not involve additional construction activities or work within Watsonville Slough beyond what was analyzed for the Original Project in the certified Final EIR. The Modified Project would not involve work within any other surface waters, including streams or rivers. Construction of the Modified Project would disturb the same area of the project site as the Original Project, resulting in no additional soil disturbance or potential for soil erosion on the project site. The proposed modifications to Errington Road to provide secondary access to the project site would involve limited ground disturbance, which would have the potential to increase erosion potential or soils within the roadway. However, like the Original Project, a SWPPP would also be required for construction of the Modified Project. The SWPPP would include BMPs to prevent soil erosion and resultant sedimentation of streams and surface waters during construction. Therefore, construction of the Modified Project would not increase potential for substantial erosion compared to the Original Project.

The Modified Project would not increase the sources of polluted runoff compared to the Original Project because it includes the same uses as analyzed for the Original Project. Additionally, the Modified Project would decrease the amount of impervious surface on the project site, and therefore would not increase the amount of stormwater runoff on the project site compared to the Original Project. The Modified Project would utilize on-site raingardens to treat onsite stormwater runoff, consistent with how runoff would be treated under the Original Project. Mitigation Measure HWQ-1, Raingarden Operations and Maintenance Manual, required for the Original Project would also be required for the Modified Project. As described in the certified Final EIR, implementation of Mitigation Measure HWQ-1 would mandate that the onsite raingardens be properly maintained to retain their stormwater storage and treatment capabilities.

A segment of Errington Road would be converted from gravel surface to paved asphalt surface under the Modified Project, resulting in an incremental increase in impervious surface off-site. The increased impervious surface would result in an incremental and commensurate increase in stormwater runoff. However, the Modified Project would not alter the existing storm drain systems in place along these roadways and would not introduce new types of pollutants. Therefore, the Modified Project would result in no new or more severe impacts related to erosion and runoff from altered drainage patterns beyond those identified in the previously certified Final EIR for the Original Project. Impacts would be less than significant with implementation of Mitigation Measure HWQ-1, consistent with the Original Project.

c. *Would the project 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:*

iv. Impede or redirect flood flows?

d. In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

The Modified Project would not alter activities included in the Original Project that would be located in a 100-year floodplain. As described on pages 383 and 384 of the certified Final EIR, the project site is not located in an area that it is subject to flooding as a result of a tsunami or seiche. Therefore, the Modified Project would have no new or more severe impacts related to flood hazard areas or inundation beyond those identified in the previously certified Final EIR for the Original Project.

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3.11 Land Use and Planning

	Where was Impact Analyzed in the EIR?	Do Proposed Changes Require Major Revisions to the EIR?	Do New Circumstances Require Major Revisions to the EIR?	Any New Information Resulting in New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?
Would the project:					
a. Physically divide an established community?	Pages 276 through 277	No	No	No	N/A
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?	Pages 277 through 295	No	No	No	N/A

a. Would the project physically divide an established community?

The Modified Project would result in no new or more severe impacts related to dividing established communities beyond those identified in the previously certified Final EIR. The Modified Project would be located at the same project site as the Original Project; the project location would be unchanged from analyzed in the certified EIR. The Modified Project would include additional work within the existing roadway of Errington Road. As Errington Road is an existing roadway, the Modified Project would result in no new or more severe impacts related to dividing established communities beyond those identified in the previously certified Final EIR.

b. Would the project 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?

The findings of the certified EIR indicate that Original Project would be consistent with City's land use plans and zoning code. The Modified Project would involve the same operational uses and activities included in the Original Project and analyzed in the certified EIR, with a reduced residential density and additional modifications to existing Errington Road to improve site ingress and circulation. Therefore, the operation of the Modified Project would also be consistent with the City's land use plans and zoning code. Therefore, the Modified Project would result in no new or more severe impacts related to consistency with applicable land uses plans, ordinances, and policies beyond those identified in the previously certified Final EIR for the Original Project.

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3.12 Mineral Resources

	Where was Impact Analyzed in the EIR?	Do Proposed Changes Require Major Revisions to the EIR?	Do New Circumstances Require Major Revisions to the EIR?	Any New Information Resulting in New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?
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?	Page 385	No	No	No	N/A
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?	Page 385	No	No	No	N/A

a. Would the project 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?

b. Would the project 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?

The Modified Project would occur on the same project site as the Original Project, as well as on existing Errington Road next to the project site. As described on page 385 of the certified Final EIR, there are no areas of the project site mapped as Mineral Resource Zone 2, which are areas that the State has identified as having significant mineral resources or high likelihood for significant mineral resources, and lands otherwise designated as having statewide or regional significance relative to mineral resources. There are no known mineral resources of value on the project site, nor are there any ongoing or prior mineral extractions on site. Therefore, consistent with the findings of the certified Final EIR for the Original Project, the Modified Project would have no impact on mineral resources of value or important mineral resource recovery sites.

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3.13 Noise

	Where was Impact Analyzed in the EIR?	Do Proposed Changes Require Major Revisions to the EIR?	Do New Circumstances Require Major Revisions to the EIR?	Any New Information Resulting in New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?
Would the project:					
a. Generate 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?	Pages 305 through 312	No	No	No	Yes
b. Generate excessive groundborne vibration or groundborne noise levels?	Page 307	No	No	No	N/A
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, expose people residing or working in the project area to excessive noise levels?	Pages 385 through 386	No	No	No	N/A

a. Would the project result in 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?

As described on pages 298 and 299 of the certified Final EIR, noise-sensitive receptors closest to the project site include existing multi-family residences in the Sea View Ranch residential neighborhood, located approximately 50 feet west of the project site on Paraiso Court. Additional multi-family residences are located approximately 300 feet southwest on Del Rio Court, approximately 350 feet south of the project site on El Capitan Court, and approximately 350 feet north of the project site across Watsonville Slough on Rio Del Pajaro Court. No new sensitive receptors have been constructed within closer proximity to the project site since certification of the Final EIR in August 2018.

As described in Impact N-6 on pages 310 through 312 of the certified Final EIR, ambient noise levels would increase from approximately 51 A-weighted decibels (dBA) equivalent sound level (Leq) to up to an estimated 87 dBA Leq at 50 feet and 72 dBA Leq at 300 feet during phase one activities and

construction of phase two of the Original Project. Impacts were found to be less than significant with implementation of Mitigation Measure N-6 in the certified Final EIR. Implementation of Mitigation Measure N-6 would reduce noise levels by approximately 18 dBA, including an estimated 10 dBA reduction due to installation of a temporary noise attenuation barrier along the north, south, and west edge of the project site.

As described in Section 1.1, *Background and Purpose of the EIR Addendum*, the City first prepared an addendum to the Final EIR in February 2019. The 2019 addendum addressed modifications to the Original Project related to modifications to Mitigation Measure N-6 contained in the Final EIR. The first addendum determined that modifications to Mitigation Measure N-6 would result in no new or substantially more significant impacts beyond those identified in the previously certified Final EIR for the Original Project. Therefore, the applicant of the Modified Project, evaluated in this Addendum, may implement either the modified Mitigation Measure N-6 described in the first addendum or Mitigation Measure N-6, as is appears in the certified Final EIR from August 2018. With implementation of either version of Mitigation Measure N-6, construction noise of the Modified Project would be reduced. Additionally, the Modified Project would reduce overall construction duration because six fewer residential units would be constructed. Further, because the Modified Project would involve burial of a portion of the contaminated soils on-site, fewer haul trips would be required to remove soil from the project site. Therefore, noise from off-hauling soils that would have occurred under the Original Project would be reduced in duration as a result of the Modified Project.

Construction of modifications to existing Errington Road would be in proximity to residences immediately to the west of Errington Road. The certified Final EIR evaluated construction noise in similar proximity to the proposed Loma Vista entrance to the site included in the Original Project. Impacts of the Original Project on these receptors were determined to be less than significant with implementation of Mitigation Measure N-6. Therefore, implementation of Mitigation Measure N-6 would reduce construction noise impacts on the receptors near Errington Road receptors, as well. Additionally, WMC Section 5-8.02 prohibits any noise that is louder than necessary and disturbs the quiet of residential properties and public ways between the hours of 10:00 PM and 7:00 AM in such a manner as to be plainly audible at a distance of 50 feet from the sensitive receptor. Construction of the Modified Project would not occur between the hours of 5:00 PM and 9:00 AM on weekdays or between 4:00 PM and 9:00 AM on Saturdays. Therefore, consistent with the Original Project and as analyzed in the certified Final EIR, project construction would not exceed the standards established in the General Plan or noise ordinance of the WMC. The Modified Project would have no new or substantially more severe significant impacts related to project construction noise or temporary noise beyond those identified in the previously certified Final EIR.

Operation of the Modified Project would not change the land use from residential; however, residential density would increase by six housing units. The reduced density would result in a corresponding number of vehicle trips to and from the project site, as fewer residents would be present. Therefore, there would be a slight decrease in the frequency of project generate noise on Loma Vista, which would be the primary access to the project site, consistent with the Original Project. The certified Final EIR did not evaluate the use of Errington Road for secondary site ingress. However, the first addendum to the Final EIR that the City prepared in February 2019 evaluated use of Errington Road for both secondary ingress and egress to the project site. According to a traffic impact analysis prepared by Keith Higgins, Traffic Engineer, specifically for the first addendum, approximately 20 percent of project-generated trips would use Errington Road for site access. The Modified Project proposed use of Errington Road for secondary ingress only. Therefore, the

Modified Project would result in less than 20 percent of project generated trips occurring on Errington Road because outbound/egress trips would not occur. Nonetheless, the vehicle trips that would occur on Errington Road trips would generate noise at the residences located along either side of Errington Road. Residences along Errington Road are within as close as 22 feet of the roadway centerline. The certified Final EIR evaluated the traffic noise levels at residential receptors as close as 20 feet and found noise levels would not exceed standards or increase substantially.

Because the Modified Project would not shift vehicle trips closer to sensitive noise receptors or increase the volume of traffic generate by the project, and would not involve other new operational sources, impacts would be less than significant, consistent with impacts of the Original Project, as identified in the certified Final EIR. The Modified Project would result in no new or substantially more severe significant impacts related to conflict with applicable noise standards or permanent increases in ambient noise levels beyond those identified in the previously certified Final EIR for the Original Project.

b. Would the project generate excessive groundborne vibration or groundborne noise levels?

As described in Impact N-2 on page 307 of the certified Final EIR, construction of the Original Project would generate groundborne vibration levels that exceed 72 vibration decibels (VdB) at the nearest sensitive receptors, which are residences 50 feet to the west of the project site. A vibration level of 72 VdB is the threshold established by the Federal Transit Authority (FTA) for residential structures where people normally sleep, as well as hotels. As described on page 307 of the certified Final EIR, the Original Project would have less than significant groundborne vibration impacts because construction would be temporary and intermittent, and resultant vibration levels would not exceed levels that would affect fragile buildings or occur during hours when people normally sleep.

The Modified Project would not require additional types of construction equipment from what was analyzed for the Original Project in the certified Final EIR. Therefore, there would be no new sources of groundborne vibration resulting project construction. Modifications to Errington Road required for secondary access would require grading and compaction activities, as well as paving. These activities are consistent with the construction activities that would occur on the project site under the Original Project. However, these activities would occur within approximately 30 feet of residences, which is closer than the 50 feet analyzed for the Original Project in the certified Final EIR. According to the FTA, large bulldozers generate 87 VdB at 25 feet from the dozer. Therefore, groundborne vibrations levels at receptors 30 feet from Errington Road could experience vibration levels equal to or slightly less than 87 VdB, which is approximately 6 VdB higher than vibration levels that would have resulted from the Original Project. However, the construction of the Modified Project would not lengthen the overall duration of construction, and construction would not occur during hours when people normally sleep. Additionally, 87 VdB is below the FTA's threshold for structural damage, which is approximately 94 VdB for non-engineered timber and masonry buildings, such as residential structures. Additionally, because only a portion of contaminated soils would be hauled off-site, there would be fewer truck trips to off-haul soil coming to and from the project site during construction. This would reduce the duration of construction vibration in proximity to residences near Errington Road. Therefore, impacts would be less than significant, and the Modified Project would result in no new or substantially more severe significant impacts related to vibration beyond those identified in the previously certified Final EIR for the Original Project.

c. Would the project be 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, and expose people residing or working in the project area to excessive noise levels?

The Modified Project would occur on the same project site as the Original Project, as well as on existing roadway segments next to the project site. As described on page 386 of the certified Final EIR, there are no private airstrips in the vicinity of the project site. The Watsonville Municipal Airport is located 1.7 miles northeast of the project site, but the project site is outside the airport noise contours for 2007 and 2030 as illustrated in Figures 4 and 5 of the Watsonville Municipal Airport Master Plan (Watsonville Municipal Airport 2003). The Modified Project would not expose people to excessive noise levels from an airport. Therefore, consistent with the findings of the certified EIR for the Original Project, the Modified Project would have no impact.

3.14 Population and Housing

	Where was Impact Analyzed in the EIR?	Do Proposed Changes Require Major Revisions to the EIR?	Do New Circumstances Require Major Revisions to the EIR?	Any New Information Resulting in New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?
Would the project:					
a. Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	Page 386	No	No	No	N/A
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	Page 386	No	No	No	N/A

a. Would the project induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?

b. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

The Original Project includes the development of 150 new residences on the project site. The Modified Project would reduce the number of residences by six, resulting in an estimated decrease of on-site population of approximately 38 people, as described in Section 3.3, *Air Quality*. The changes to site access, including modifications to Errington Road for secondary site access would not displace existing housing or people. The addition of more retaining walls on the project site would not divide the community because the Modified Project includes sidewalks and trails for pedestrian movement through and across the project site. Because no new housing or displacement is proposed, impacts of the Modified Project would be consistent with the Original Project. The Modified Project would have no new or substantially more severe significant impacts that previously identified for the Original Project in the certified Final EIR.

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3.15 Public Service

		Where was Impact Analyzed in the EIR?	Do Proposed Changes Require Major Revisions to the EIR?	Do New Circumstances Require Major Revisions to the EIR?	Any New Information Resulting in New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?
Would the project:						
a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the 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 of the public services:						
1	Fire protection?	Pages 330 through 331	No	No	No	N/A
2	Police protection?	Pages 331 through 332	No	No	No	N/A
3	Schools?	Pages 332 through 333	No	No	No	N/A
4	Parks?	Pages 333 through 334	No	No	No	N/A
5	Other public facilities?	Pages 334 through 335	No	No	No	N/A

a. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the 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:*

1. *Fire protection?*
2. *Police protection?*
3. *Schools?*
4. *Parks?*
5. *Other public facilities?*

As described in Impact PSU-1 on pages 330 and 331 of the certified Final EIR, the Original Project would develop 150 residences on the project site, resulting in approximately 570 new residents. The Modified Project would reduce residential density by six housing units, resulting in 144 housing units. As described in Section 3.3, *Air Quality*, of this Addendum, based on current household size in Watsonville, 144 housing units would result in a total population on-site of 532 residents. Therefore, the Modified Project because there would be fewer on-site structures and fewer on-site residents, the Modified Project would not increase the demand for fire or police services or for school facilities compared to the Original Project analyzed in the certified Final EIR. Additionally, because there would be six fewer housing units on the project site, there would be corresponding decrease in demand for recreation facilities and other public facilities, such as libraries. The Modified Project would result in no new or more severe impacts beyond those identified in the previously certified Final EIR for the Original Project.

3.16 Recreation

	Where was Impact Analyzed in the EIR?	Do Proposed Changes Require Major Revisions to the EIR?	Do New Circumstances Require Major Revisions to the EIR?	Any New Information Resulting in New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?
Would the project:					
a. 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?	Pages 333 through 334	No	No	No	N/A
b. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	Pages 333 through 334	No	No	No	N/A

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?

b. Would the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

As discussed in Section 3.14, *Population and Housing*, of this Addendum, neither the Original Project nor the Modified Project would induce substantial unplanned population or employment growth, and neither include recreational facilities. Therefore, neither would therefore significantly increase the use of existing recreational facilities or include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. The Modified Project would occur on the same site as the Original Project and would not substantially increase the total amount of development on the site compared to the Original Project. In fact, the Modified Project would reduce residential density by six housing units, resulting in 144 housing units. As described in Section 3.3, *Air Quality*, of this Addendum, based on current household size in Watsonville, 144 housing units would result in a total population on-site of 532 residents. Therefore, the Modified Project because there would be fewer on-site structures and fewer on-site residents, the Modified Project would not increase the demand for or use of recreational facilities compared with the Original Project. The Modified Project would result in no new or more severe impacts regarding recreation beyond those identified in the previously certified Final EIR for the Original Project.

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3.17 Transportation

	Where was Impact Analyzed in the EIR?	Do Proposed Changes Require Major Revisions to the EIR?	Do New Circumstances Require Major Revisions to the EIR?	Any New Information Resulting in New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?
Would the project:					
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	Pages 372 through 373	No	No	No	N/A
b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	N/A	No	No	No	N/A
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?	Pages 369 through 371	No	No	No	Yes
d. Result in inadequate emergency access?	Pages 371 and 372	No	No	No	N/A

a. Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

The Modified Project would be on the same project site as the Original Project. Therefore, the Modified Project would be in proximity to the same transit stops as the Original Project. As described in Section 3.3, *Air Quality*, the Modified Project would result in approximately 532 residents on the project site, which is approximately 38 fewer residents than the Original Project. Accordingly, there would be a corresponding decrease in demand for transit. The Modified Project would result in no new or more severe impacts on transit facilities beyond those identified in the previously certified Final EIR for the Original Project.

Because residential density on-site would decrease with the Modified Project, there would be fewer vehicle trips generated by the project. Additionally, there would be fewer vehicle trips during project construction because less haul trips would be required to export contaminated soil. According to a traffic impact analysis prepared by Keith Higgins, Traffic Engineer, specifically for the first addendum, approximately 20 percent of project-generated trips would use Errington Road for site access. The Modified Project proposed use of Errington Road for secondary ingress only. Therefore, the Modified Project would result in less than 20 percent of project generated trips occurring on Errington Road because outbound/egress trips would not occur. Regardless, the traffic impact analysis determined that with 20 percent of the trips, Errington Road would operate

acceptably. Therefore, the Modified Project would result in no new or more severe impacts on roadway facilities beyond those identified in the previously certified Final EIR for the Original Project.

The Modified Project would include pedestrian sidewalks and a trail for bicycles and pedestrians on the project site, consistent with provisions of the Original Project. Pedestrian facilities would not be provided on Errington Road, consistent with existing conditions. Therefore, the Modified Project would result in no new or more severe impacts on bicycle and pedestrian facilities beyond those identified in the previously certified Final EIR for the Original Project.

b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

CEQA Guidelines section 15064.3, subdivision (b), which was added to the CEQA Guidelines as part of the update adopted by the State in November 2018, defines acceptable criteria for analyzing transportation impacts under CEQA. It states that land use projects with vehicle miles traveled (VMT) exceeding an applicable threshold of significance may indicate a significant impact, and that projects that decrease VMT compared to existing conditions should be presumed to have a less than significant transportation impact. As discussed on the previous page, the Modified Project would result in fewer vehicles trips because residential density on-site would decrease, resulting fewer residents travelling to and from the project site. Because there would be fewer vehicle trips, the Modified Project would result in a corresponding reduction in the total project VMT compared with the Original Project.

The underlying environmental impacts of VMT are related to adverse effects of automobile use, which are generally emissions of air pollutants and GHG. Assuming all vehicles are internal combustion engines, as VMT increases, the resultant emissions of pollutants and GHG also increases. As indicated in Table 10 on page 135 of the certified Final EIR, operation air pollutant emissions of the Original Project, including emissions from vehicles, would not exceed significant thresholds, and impacts of the Original Project would be less than significant. The Modified Project would result in reduced air pollutant emissions compared to the Original Project due to fewer vehicle trips and few residential units, as described in Section 3.3, *Air Quality*. Accordingly, the City has determined that the air quality impacts of the Modified Project, including those resulting from VMT would be less than significant.

As indicated in Table 14 on page 228 of the certified Final EIR, the GHG emissions of the Original Project, including emissions from vehicles, would not exceed significant thresholds, and impacts of the Original Project would be less than significant. The Modified Project would result in reduced GHG pollutant emissions compared to the Original Project due to fewer vehicle trips and few residential units, as described in Section 3.8, *Greenhouse Gas Emissions*. Accordingly, the City has determined that the GHG impacts of the Modified Project, including those resulting from VMT would be less than significant. Therefore, the environmental impacts of the Modified Project resulting from VMT would be less than significant, and the Modified Project would result in no new or more severe impacts beyond those identified in the previously certified Final EIR for the Original Project.

c. Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?

The Modified Project would provide secondary ingress to the site via Errington Road. In order to prevent a potentially hazardous intersection, only right-turn movements on Errington Road from

Ohlone Parkway would be permitted. By limiting turning movements to right turns only, potentially hazardous conditions of turning left onto Errington Road from Ohlone Parkway would be avoided. New signage and/or roadway markings would be provided at the intersection of Errington Road and Ohlone Parkway to notify drivers of the allowable turning movements. On-site, internal circulation roads vary little from the Original Project and would be constructed to City requirements. Because the Modified Project would be residential development, there would be no potential for incompatible equipment, such as farm equipment, to occur on roadways as a result of the Modified Project. Therefore, the Modified Project would result in no new or more severe impacts related to safety risks pertaining to hazardous design features or incompatible uses beyond those identified in the previously certified Final EIR for the Original Project.

d. Would the project result in inadequate emergency access?

As described on pages 371 and 372 of the certified Final EIR, the Original Project provides two means for emergency access to the project site: 1) Loma Vista Drive; and 2) an emergency vehicle/restricted access road between the project site and the Sunshine Garden residential project, which is currently being constructed to the southeast. With these two access points, the Original Project was determined to have less than significant impacts, as described in Impact TRA-5 on pages 371 and 372 of the certified Final EIR.

The Modified Project does not propose eliminating either of these emergency access routes onto the project site. Additionally, the Modified Project would provide for a third emergency access option via Errington Road. Therefore, the Modified Project would result in no new or more severe impacts related to inadequate emergency access beyond those identified in the previously certified Final EIR for the Original Project.

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3.18 Tribal Cultural Resources

	Where was Impact Analyzed in the EIR?	Do Proposed Changes Require Major Revisions to the EIR?	Do New Circumstances Require Major Revisions to the EIR?	Any New Information Resulting in New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in a Public Resources Code Section 21074 as either a site, feature, place, or 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:					
a. 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)?	Pages 192 through 193	No	No	No	Yes
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant 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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	Pages 192 through 193	No	No	No	Yes

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in a Public Resources Code Section 21074 as either a site, feature, place, or 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:

a. 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)?

b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant 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 Resources Code

Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Tribal cultural resources are site specific. The Modified Project would be located at the same project site as the Original Project; the project location would be unchanged. The project would involve modifications to Errington Road would occur within existing roadway. Because existing roadways have been previously disturbed and developed, the potential to encounter tribal cultural resources is considered low. The proposed modifications to the site remediation plan would involve excavating an envelope for the burial of contaminated soils. However, the excavation would occur within areas where extensive grading would occur for the Original Project and analyzed in the certified Final EIR. Nonetheless, mitigation measures identified in the certified Final EIR to reduce or avoid impacts to potentially unknown tribal cultural resources required for the Original Project would also be required for the Modified Project. These mitigation measures include:

- MM CR-1a. Archaeological Resources Construction Monitoring
- MM CR-1b. Unanticipated Discovery of Cultural Resources
- MM CR-2a. Worker Environmental Awareness Program Training
- MM CR-4. Native American Construction Monitoring

With implementation of the required mitigation measures listed above, impacts of the Modified Project would be less than significant, consistent with impacts of the Original Project as identified in the certified EIR. The Modified Project would result in no new or more severe impacts on tribal cultural resources beyond those identified in the previously certified Final EIR for the Original Project.

3.19 Utilities and Service Systems

	Where was Impact Analyzed in the EIR?	Do Proposed Changes Require Major Revisions to the EIR?	Do New Circumstances Require Major Revisions to the EIR?	Any New Information Resulting in New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?
Would the project:					
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	Pages 335 through 343	No	No	No	N/A
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	Pages 337 through 341	No	No	No	N/A
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?	Page 336	No	No	No	N/A
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?	Pages 341 through 342	No	No	No	N/A
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	Pages 342 through 343	No	No	No	N/A

a. Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

The Modified Project would occur on the same project site as the Original Project. The project site is an urban area of Watsonville with existing development to the east and west. Utilities, such as water, wastewater and sanitary sewer, stormwater, electricity, natural gas, and telecommunication facilities are present in existing development adjacent to the project site. Connections to these existing utilities would adequately service the Modified Project and Original Project. Therefore, the Modified Project would result in no new or more severe impacts beyond those identified in the previously certified Final EIR for the Original Project.

b. Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

c. Would the project 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?

d. Would the project 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?

e. Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

The Modified Project would occur on the same project site as the Original Project. Accordingly, the Modified Project would be served by the same water and wastewater treatment providers and the same solid waste landfill. Compared with the Original Project, the Modified Project would develop six fewer housing units. The decreased residential development on the project site would result in a corresponding decrease in water demand, wastewater generation, and solid waste generation. Therefore, the Modified Project would require less water than the Original Project and would generate less demand for wastewater treatment and landfill capacity than the Original Project. Accordingly, the Modified Project would result in no new or more severe impacts beyond those identified in the previously certified Final EIR for the Original Project.

3.20 Wildfire

	Where was Impact Analyzed in the EIR?	Do Proposed Changes Require Major Revisions to the EIR?	Do New Circumstances Require Major Revisions to the EIR?	Any New Information Resulting in New or Substantially More Severe Significant Impacts?	Do EIR Mitigation Measures Address and/or Resolve Impacts?
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?	Page 240	No	No	No	N/A
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?	Page 240	No	No	No	N/A
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?	Page 240	No	No	No	N/A
d. Expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	Page 240	No	No	No	N/A

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?

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?

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?

d. Expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

The Modified Project would occur on the same project site as the Original Project. As described in the certified Final EIR, the project site is located in a moderate fire hazard severity zone as mapped by California Department of Forestry and Fire Protection (2007). However, future residences onsite would be designed to reduce fire risk through required compliance with applicable standards set forth in the California Fire Code, California Residential Code, and the Watsonville General Plan's Public Safety Element. Standards would include automatic fire protection systems, such as fire breaks, fire-retardant building materials, automatic fire sprinkler systems, and/or water storage tanks. The Modified Project would result in six fewer housing units on-site, reducing the number of structures and residents potentially at risk of a fire on the project site. Accordingly, the Modified Project would result in no new or more severe impacts beyond those identified in the previously certified Final EIR for the Original Project.

4 Conclusion

As established in the analysis above regarding the potential environmental effects that may be generated as compared to the Original Project, it is concluded that substantial changes are not proposed to the Original Project nor have substantial changes occurred that would require major revisions to the certified Final EIR prepared for the Original Project. Impacts beyond those identified and analyzed in the certified Final EIR would not be expected to occur as a result of the Modified Project. Overall, the proposed modifications to the Original Project that constitute the Modified Project would result in no new impact or mitigation information of substantial importance that would generate new, more severe impacts or require new mitigation measures compared to those identified for the Original Project in the certified Final EIR.

Therefore, the City concludes that the analyses conducted and the conclusions reached and the mitigation measures adopted in the Final EIR certified in August 2018. As such, the Modified Project would not result in conditions identified in *State CEQA Guidelines* Section 15162 requiring supplemental environmental review or a Subsequent EIR, and these are therefore not required for the Modified Project. It can be emphasized that the Modified Project would be remain subject to all previously adopted mitigation measures included in the certified Final EIR for the Original Project, except for Mitigation Measure N-6, which may be implemented in accordance with the first addendum prepared for the certified Final EIR. Based on the above analysis, this Addendum to the previously certified Final EIR for the project has been prepared in accordance with Section 15164 of the *State CEQA Guidelines*.

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