

City of Livermore  
Community Development Department



**Arroyo Vista Neighborhood Plan and 2017 Approved  
Residential Project**

**Addendum**

**May 2024**

Prepared by



1501 Sports Drive, Suite A, Sacramento, CA 95834

## **A. INTRODUCTION AND SUMMARY**

The purpose of this Addendum is to demonstrate that further environmental review is not required given that the proposed modifications to the approved project would not trigger the applicable criteria set forth in the CEQA Guidelines Section 15162.

The City of Livermore, Community Development Department, has reviewed the Arroyo Vista Neighborhood Project (proposed project) and on the basis of the whole record before it, has determined that pursuant to CEQA Guidelines Section 15162, no substantial changes have occurred with respect to the circumstances under which the original CEQA document was adopted (in this case, the Arroyo Vista Neighborhood Plan Initial Study/Mitigated Negative Declaration [IS/MND], as amended by the Arroyo Vista Neighborhood Project Addendum), and there is no new available information, which was not known and could not have been known at the time that the original CEQA document was adopted. The proposed project, as identified in this Addendum, would not have a significant effect on the environment beyond that which was evaluated in the Arroyo Vista Neighborhood Plan IS/MND (2007 IS/MND) or the approved and entitled 2017 residential project. Therefore, the proposed project would not trigger the applicable criteria set forth in the CEQA Guidelines Section 15162.

This Addendum to the 2007 IS/MND, as amended by the 2017 Addendum, has been prepared pursuant to Title 14, Section 15164 of the California Code of Regulations and City of Livermore environmental standards.

## **B. PROJECT BACKGROUND AND LOCATION**

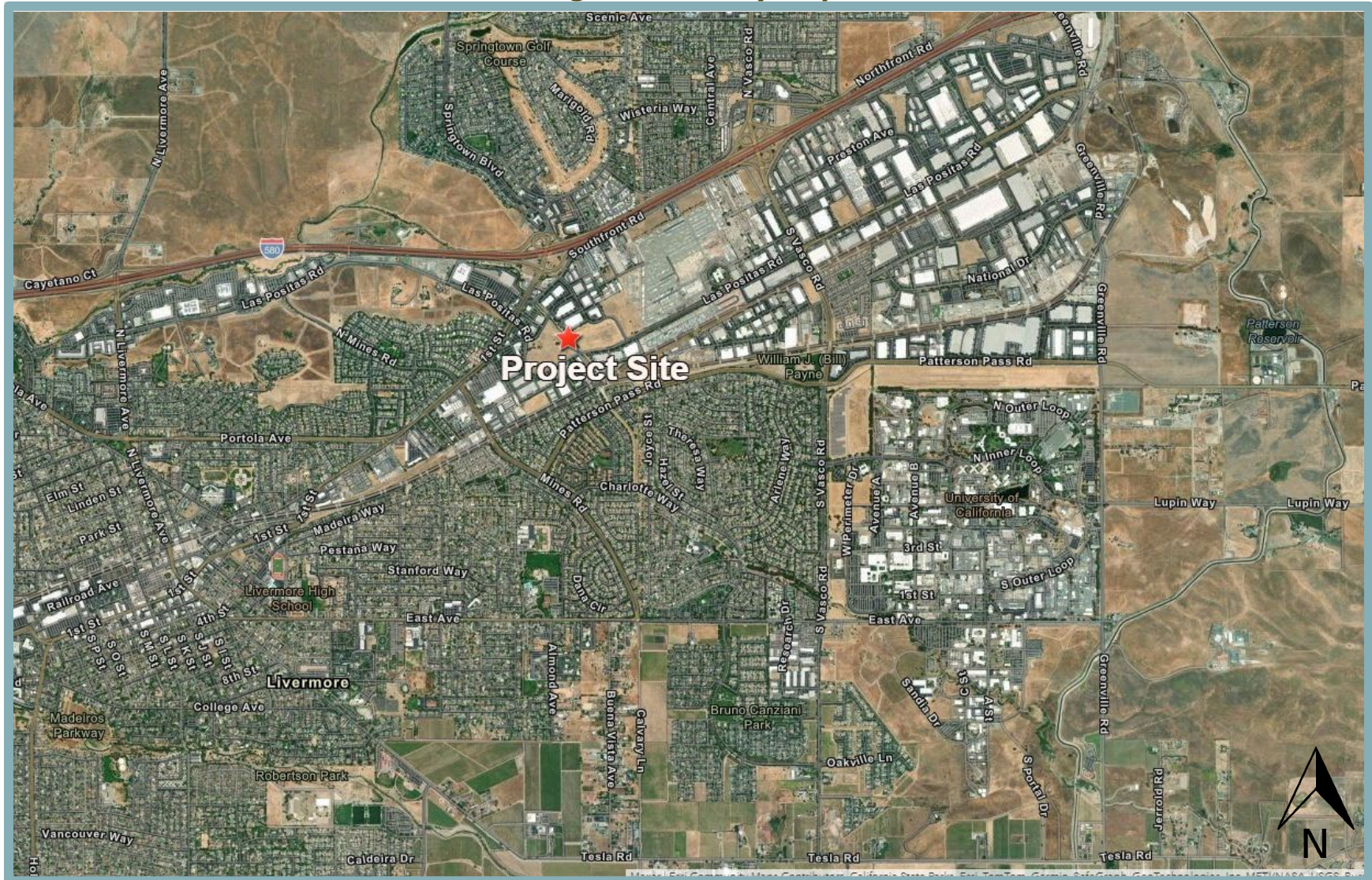
The approximately 28-acre Arroyo Vista Neighborhood Plan Project site is located southeast of the intersection of Las Positas Road and Arroyo Vista in the City of Livermore, California, and is bisected by the Arroyo Seco Channel (see Figure 1 and Figure 2). Surrounding existing land uses include light industrial and commercial uses to the north; undeveloped land and a modular building manufacturer to the east, across Bennett Drive; commercial uses to the west, across Las Positas Road; and light industrial and commercial uses to the south, across Las Positas Road.

The 2007 IS/MND, adopted by City Council in 2007, analyzed two conceptual plans for future development of the Arroyo Vista Neighborhood Plan, a residential community, on the site. Plan A (see Figure 3) assumed development of a residential community with 402 residential units consisting of 87 single-family homes and 315 townhomes, and 8.5 acres of open space. Plan B (see Figure 4) assumed development of up to 495 residential units consisting of 170 multi-family residences and 325 townhomes, and 9.3 acres of open space. In addition, the project included a multi-use trail along the west side of the Arroyo Seco Channel and a pedestrian bridge over the channel to connect the western and eastern neighborhoods. The project required approval of a Rezone of the site from Planned Unit Development to Planned Development Residential, a Tentative Map, a Development Agreement, and Site Plan Design Review.

The 2017 Addendum was adopted by City Council in June 2017, along with a land use entitlement package submitted by a homebuilder that refined the original project to focus solely on one site plan. The site plan that was approved in 2017 is shown in Figure 5 and Figure 6. The refined project – approved with a tentative tract map, site plan design review, planned development, and development agreement – included a total of 435 dwelling units, including a mix of 86 single-family detached houses, 249 detached townhomes, and 100 multi-family condominiums. Of the total 435 dwelling units, 195 units would be located on the western portion of the site and 240 units would be located on the eastern portion of the site.



**Figure 1**  
**Regional Vicinity Map**



**Figure 2**  
**Project Site Boundaries**



**Figure 3  
Conceptual Land Use Plan A**

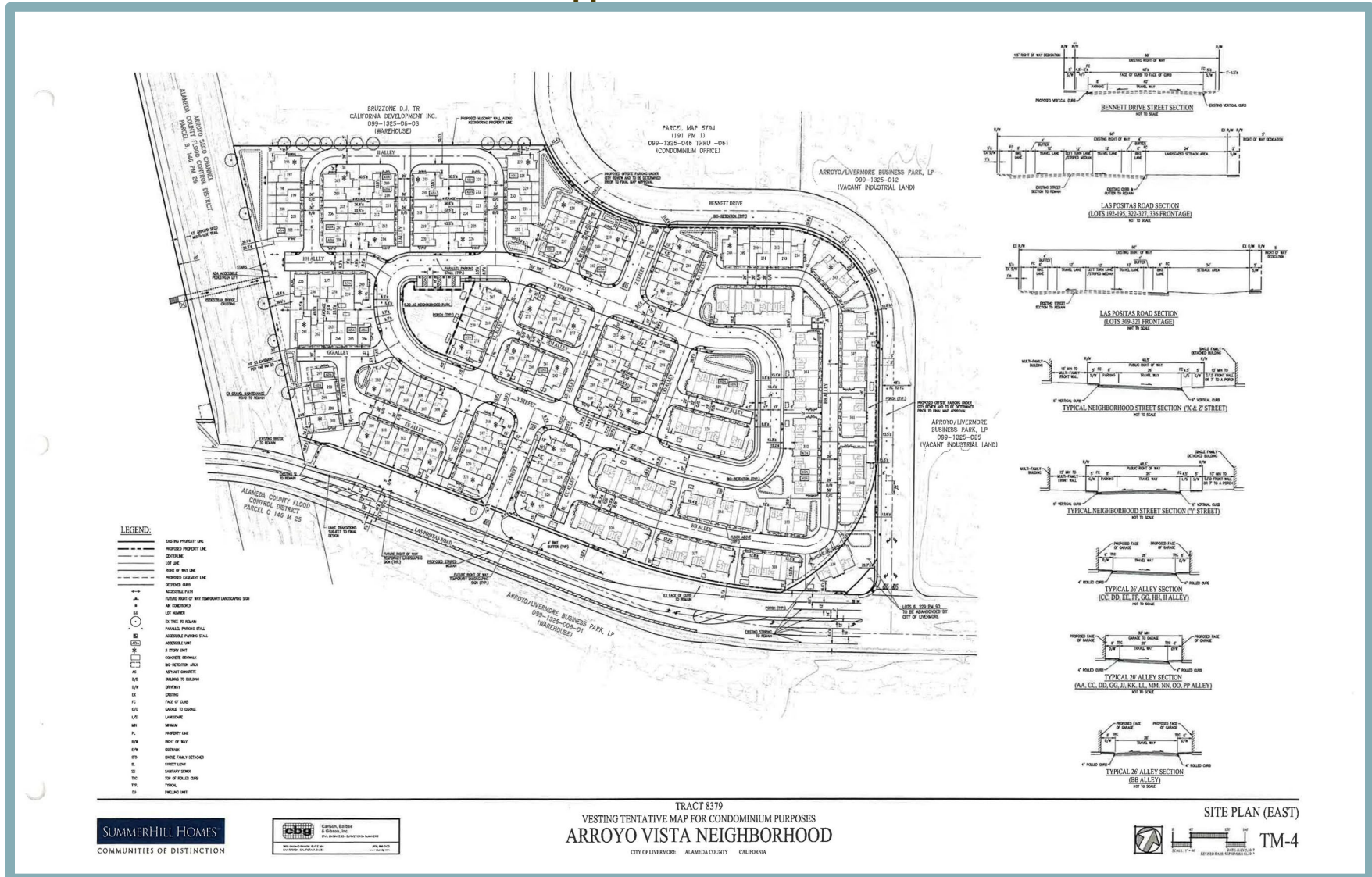


**Figure 4**  
**Conceptual Land Use Plan B**





**Figure 6**  
**2017 Approved Site Plan East**





The single-family detached houses would be two-story and have a maximum height of 30 feet, and the townhomes and condominiums would be three-story and have a maximum height of 45 feet.

In addition, the 2017 approved project included a 0.5-acre neighborhood park on the western portion of the site with a play area, pergola, picnic tables, community building, outdoor kitchen, outdoor fireplace, seating, and pool area. The eastern portion of the site included an approximately 0.2-acre neighborhood park with a community garden, barbeque area, and play area. Similar to the Arroyo Vista Neighborhood Plan land use concept, the 2017 approved project included a multi-use trail on the west side of the Seco Arroyo Channel and an eight-foot-wide pedestrian bridge across the Arroyo Seco Channel, which would connect the western and eastern neighborhoods.

### **C. PROJECT DESCRIPTION**

The current proposed project would involve minimal modifications to the approved 2017 residential project and IS/MND, as amended in 2017. Specifically, the proposed project would include the addition of a third story to the 86 single-family detached residences on the western portion of the site that were originally proposed as two-story buildings, and the elimination of the pedestrian bridge component. The addition of a third story to the 86 single-family detached residences on the western portion of the site (see Figure 7) would accommodate the square footage and bedroom needs of the current market. The proposed modification would increase the maximum allowed height of the single-family detached residences from 30 feet to 45 feet. The revisions would be to the architecture only, with special care to match previous design styles and corner enhancements visible from the public realm. The number of lots and streets would remain within substantial conformance to previous approvals.

As shown in Figure 5 and Figure 6, the pedestrian bridge was designed to connect the western and eastern neighborhoods by crossing the Arroyo Seco Channel, which is owned and maintained by Zone 7 Water Agency. However, an aerial easement could not be obtained, which would allow for construction, access, and maintenance of the pedestrian bridge over the Arroyo Seco Channel. Thus, the proposed project would eliminate the pedestrian bridge component from the previously approved project, and the original bridge landing areas would be improved as pocket parks to serve as additional outdoor amenity spaces, including dining and barbeque areas (see Figure 8).

The City of Livermore General Plan designates the site as Light Intensity Industrial (LII)/Urban High Residential, 14 to 18 dwelling units per acre (UH-3), and the site is zoned Planned Development Residential (PDR-16-004). The proposed project would not involve any changes to the land use designations for the site. However, revisions to the PDR-16-004 design standards and Site Plan Design Review would be required to allow for the proposed three-story single-family detached residences and elimination of the pedestrian bridge component. In addition, amendments to the Arroyo Vista Neighborhood Plan, Development Agreement, Site Plan Design Review, and Conditions of Approval would be required for the elimination of the pedestrian bridge.

### **D. RATIONALE FOR PREPARATION OF THE ADDENDUM**

In determining whether an addendum is the appropriate document to analyze the modifications to the project and its approval, CEQA Guidelines Section 15164 (Addendum to an EIR or Negative Declaration) states:



**Figure 7**  
**Single-Family Detached Houses**



**Figure 8**  
**Proposed Pocket Park Improvements**



- (a) The lead agency or a 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.
- (c) An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration.
- (d) The decision-making body shall consider the addendum with the final EIR or adopted negative declaration prior to making a decision on the project.
- (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 required findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.

New significant effects or other grounds require preparation of a subsequent EIR in support of further agency action on a project pursuant to Public Resources Code Section 21166 and State CEQA Guidelines Sections 15162 and 15163. Under the guidelines, a subsequent or supplemental EIR or Mitigated Negative Declaration shall be prepared if any of the following criteria are met:

- (a) When an EIR has been certified or negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:
  - (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.

## **E. USE OF A PRIOR ENVIRONMENTAL DOCUMENT:**

The California Supreme Court has held that a lead agency has the responsibility of initially deciding whether an original environmental document retains “some relevance” to the ongoing decision-making process. The City of Livermore has determined that the 2007 IS/MND as amended in 2017 for the approved project is relevant and has prepared an addendum to that document to evaluate the proposed project.

Based on the above, in accordance with Sections 15162 through 15164 of the CEQA Guidelines, the proposed project would not require major revisions to the 2007 IS/MND, as amended in 2017, if the proposed project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects. The analysis that follows concludes that none of the conditions identified in CEQA Guidelines Sections 15162 and 15163 apply to the proposed project. Thus, preparation of an addendum would provide the appropriate level of environmental review.

In cases where an approved project has already undergone environmental review, and the environmental document has been certified by the lead agency, the lead agency can restrict its review to the incremental effects of the modified project, rather than having to reconsider the overall impacts of the project. In other words, if the project under review constitutes a modification of a previously approved project subjected to environmental review, then the “baseline” for purposes of CEQA is adjusted such that the originally approved project is assumed to exist.<sup>1</sup>

## **F. DISCUSSION**

The following sections provide discussions of any potential impacts associated with the proposed project beyond those previously identified in the 2007 IS/MND as amended in 2017. Given the limited scope of changes that would occur as a result of the proposed project in comparison to the 2017 approved project, this Addendum provides a detailed evaluation of select CEQA topics potentially affected by the changes, including Aesthetics, Air Quality, Greenhouse Gas Emissions, Energy, Noise, Transportation, Land Use and Planning, Population and Housing, Public Services, Utilities, and Hydrology and Water Quality. The remaining CEQA topics are appropriately discussed at a lesser level of detail.

### **Aesthetics**

The proposed project would modify the previously approved 2007 IS/MND, as amended in 2017 by adding a third story to the 86 single-family detached residences on the western portion of the site that were originally proposed as two-story buildings. As a result, the 86 detached residences would more closely match the design of the three-story, attached residences proposed on the eastern and western portions of the project site. The additional story would increase the maximum

<sup>1</sup> See Michael H. Remy et al. *Guide to CEQA, 11<sup>th</sup> Edition*. Point Arena: Solano Press Books (2007), p. 207; Stephen L. Kostka and Michael H. Zischke. *Practice Under the Environmental Quality Act, Second Edition* (Vol. 1). Oakland: Continuing Education of the Bar (2018), p. 12-32; *Benton v. Board of Supervisors* (1<sup>st</sup> Dist. 1991) 226 Cal. App. 3d 1467.



building height for the single-family residences located on the western portion of the project site from 30 feet to 45 feet. The revisions are to the architecture only, with special care to match previous design styles and corner enhancements visible from the public realm. The proposed project would be subject to the same rules governing aesthetics and glare. Furthermore, the previous IS/MND, as amended in 2017, concluded that scenic vistas are not visible from the site or surrounding properties, and, due to the area surrounding the project site being heavily developed, a less-than-significant impact would occur from the proposed project buildout. The visual character of the proposed project would be consistent with what was intended for the site within the 2007 IS/MND, as amended in 2017. Accordingly, any impacts associated with aesthetics as a result of the proposed project would remain the same as what was previously identified in the 2007 IS/MND, as amended in 2017, which concluded mitigation measures were not needed. Thus, based on the above, the proposed project would not result in any changes, new circumstances, or new information that would involve new significant impacts or substantially more severe impacts related to aesthetics from what has been anticipated for the project site in the 2007 IS/MND, as amended in 2017.

### **Air Quality, Energy, and Noise**

Because the proposed project would not involve any changes to the anticipated land uses associated with the site and would result in the same area of disturbance and number of units, the same level of air pollutant emissions, energy usage, and noise associated with both construction and operation of the proposed project would occur as what has already been anticipated for the project site and analyzed in the 2007 IS/MND, as amended in 2017. In addition, statewide standards related to air quality and energy consumption have progressively become more stringent over time, such as the 2022 California Building Standards Code (CBSC), including the 2022 Building Energy Efficiency Standards Code, and the California Green Building Standards Code (CALGreen Code). Such standards, as well as technological innovations, would ensure that as cumulative development occurs under the increasingly stringent regulations, air pollutant emissions and energy use associated with such cumulative development is anticipated to be reduced over time. The proposed project would be required to comply with all applicable standards and regulations associated with air quality and energy, including the most recent version of the CALGreen Code and California Building Energy Efficiency Standards Code. The applicable CEQA thresholds of significance have not changed related to air quality, energy, and noise since the 2007 IS/MND, as amended in 2017, were prepared. Therefore, impacts associated with air quality, energy, and noise, as a result of the proposed project would be the same as what was previously identified, and the mitigation measures for impacts related to noise set forth in the 2007 IS/MND, as amended in 2017, would remain applicable.

Based on the above, the proposed project would not result in any changes, new circumstances, or new information that would involve new significant impacts or substantially more severe impacts related to air quality, energy, or noise from what has been anticipated for the project site in the 2007 IS/MND, as amended in 2017. Implementation of the mitigation measures in the 2007 IS/MND, as amended in 2017, would continue to ensure impacts would be less than significant.

### **Greenhouse Gas Emissions**

Because the proposed project would not involve any changes to the anticipated land uses associated with the site and would result in the same area of disturbance and number of units, the same level of greenhouse gas (GHG) emissions associated with both construction and operation of the proposed project would occur as what has already been anticipated for the project site and analyzed in the 2007 IS/MND, as amended in 2017. In addition, as noted above statewide standards related to air quality and energy consumption have progressively become more



stringent over time, such as the 2022 California Building Energy Efficiency Standards Code and the CALGreen Code. Such standards, as well as technological innovations, are also anticipated to reduce GHG emissions over time.

In addition to advancements in statewide standards and regulations, since the 2007 IS/MND and 2017 Addendum were approved, the City has taken numerous actions towards promoting sustainability within the City, including updating the City’s Climate Action Plan (CAP). The City adopted the updated CAP on November 28, 2022. The Bay Area Air Quality Management District (BAAQMD) thresholds of significance related to GHG emissions have also been updated since the 2007 IS/MND and 2017 Addendum were approved. According to the BAAQMD’s current thresholds of significance for GHG emissions, a project must either include specific project design elements related to buildings and transportation or be consistent with a local GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b). The City of Livermore 2022 CAP meets the criteria to be a GHG reduction strategy under CEQA Guidelines Section 15183.5(b). Therefore, the analysis herein, similar to the analysis within the 2017 Addendum, is based on consistency with City’s CAP.

The 2022 CAP is intended to create a roadmap to achieve emissions reductions of 40 percent below 1990 levels by 2030, and carbon neutrality (i.e., net zero carbon emissions) by 2045. The CAP contains mitigation strategies and actions, consistent with State climate mitigation targets, which were developed to reduce the City’s GHG emissions to reach its adopted reduction targets for 2030 and 2045. The project’s consistency with the applicable mitigation strategies and actions of the 2022 CAP is assessed in Table 1 below.

<b>Table 1</b>	
<b>Project Consistency with the City of Livermore CAP</b>	
<b>Strategies and Actions</b>	<b>Consistency Discussion</b>
<b>Strategy D-1:</b> Improve water conservation and reuse.	All landscaping improvements would be required to comply with Section 13.25 of the Municipal Code, Water Efficient Landscape, and would be irrigated by an automatic irrigation system. The proposed project would be required to comply with Section 4.301 of the CALGreen Code to conserve water used indoors, outdoors, and in wastewater conveyance. Therefore, the proposed project would be consistent with Strategy D-1.
<b>Action D-1.3:</b> Continue implementing the Water Efficient Landscape Ordinance.	As discussed above, all landscaping improvements would be required to comply with Section 13.25, Water Efficient Landscape, of the City’s Municipal Code. Therefore, the proposed project would be consistent with Action D-1.3.
<b>Action F-1.5:</b> Require new hardscape to be permeable.	Page 46 of the Livermore CAP recognizes that for Action F-1.5, the City must first update standards for new development hardscape to be consistent with CALGreen Tier 1 and/or increase the current fee for installation of new impervious surfaces. The City has not yet updated its standards and, thus, consistency with Action F-1.5 is not required.
<b>Strategy B-1:</b> Require new buildings to be all-electric and incentivize electrification retrofits of existing buildings.	According to Section 15.26.200 of the City of Livermore Municipal Code, all newly constructed buildings within the City are required to be all-electric. The project applicant has committed to the prohibition of natural gas infrastructure in the proposed project design, in compliance with Section 15.26.200 of the City of Livermore Municipal Code. Thus, the proposed project would be consistent with Strategy B-1.
<b>Action B-1.1:</b> Require new construction to be all-electric.	See consistency discussion for Strategy B-1.



<b>Table 1 Project Consistency with the City of Livermore CAP</b>	
<b>Strategies and Actions</b>	<b>Consistency Discussion</b>
<b>Action T-1.1:</b> Expand EV infrastructure to support EV adoption.	The 2022 CBSC, as well as the City's Reach Code amendments to the CBSC, require new developments to include the necessary electrical infrastructure for electric vehicle (EV) charging stations. The proposed project would be required to comply with the 2022 CBSC or the City's Reach Code, whichever is the more stringent standard at the time of construction. For example, under the City's Reach Code, new construction of one- and two-family dwellings and townhouses with attached private garages are required to provide two Level 2 EV Ready spaces, where Level 2 EV Ready means a listed raceway to accommodate a dedicated 208/240-volt, 40-amp circuit.  Given the proposed project's required compliance with the 2022 CBSC and/or the City's Reach Code, the proposed project would be consistent with Action T-1.1.
<b>Strategy W-1:</b> Reduce the amount of waste that is landfilled.	The project would be required to comply with all applicable provisions of Chapter 8.08, Solid Waste Management, of the City's Municipal Code. In addition, as discussed below, the proposed project would be required to comply with the CALGreen Code's construction waste diversion standards during construction of the proposed project. Therefore, the proposed project would generally be consistent with Strategy W-1.
<b>Action W-1.5:</b> Reduce construction waste.	The CALGreen Code requires all new construction projects to recycle and/or salvage for reuse a minimum 65 percent of all non-hazardous construction and demolition waste. The proposed project would be required to comply with the CALGreen Code standards, and, therefore, would be consistent with Action W-1.5.
<b>Source: City of Livermore Climate Action Plan, 2022.</b>	

As presented in the table, the proposed project would comply with the applicable mitigation strategies and actions set forth in the 2022 CAP and would, therefore, be consistent with the local GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b).

Based on the above, the proposed project would not result in any changes, new circumstances, or new information that would involve new significant impacts or substantially more severe impacts related to GHG emissions from what has been anticipated for the project site in the 2007 IS/MND, as amended in 2017.

### **Transportation**

Because the proposed project would not involve any changes to the anticipated land uses associated with the site and would result in the same area of disturbance and number of units, the same level of traffic associated with both construction and operation of the proposed project would occur compared to what has already been anticipated and analyzed for the project site in the 2007 IS/MND, as amended in 2017. Additionally, elimination of the pedestrian bridge component would not result in any new significant impacts or substantially more severe impacts. The pedestrian bridge was intended to be a private amenity for the future on-site residents of the Arroyo Vista Neighborhood only, serving to provide connection between the eastern and western portions of the site. The pedestrian bridge was not intended to provide regional connectivity or connectivity to off-site areas. For example, the pedestrian bridge is not identified in the General Plan or the City's Bicycle, Pedestrian, and Trails Active Transportation Plan (ATP). The multi-use trail along the west side of the Arroyo Seco Channel is identified in the ATP, which would remain





with the proposed project. In addition, pedestrian connectivity between the eastern and western portions of the site would still be available along Las Positas Road, located just south of where the pedestrian bridge was previously proposed. Internal connectivity throughout the eastern and western portions of the site would also continue to be provided with the proposed project. Wayfinding amenities are proposed to help enhance the path of travel for residents from Las Positas Road into the project. Therefore, impacts associated with transportation as a result of the proposed project would be the same as what was previously identified, and the mitigation measures set forth in the 2007 IS/MND would remain applicable.

Based on the above, the proposed project would not result in any changes, new circumstances, or new information that would involve new significant impacts or substantially more severe impacts related to transportation from what has been anticipated for the project site in the 2007 IS/MND, as amended in 2017. Implementation of the mitigation measures in the 2007 IS/MND and 2017 Addendum would continue to ensure impacts would be less than significant.

### **Land Use, Planning, Population, Housing, Public Services, and Utilities**

Because the proposed project would not involve any changes to the anticipated land uses or number of residential units for the site compared to what was anticipated in the 2007 IS/MND, as amended in 2017, an increase in housing and/or population associated with buildout of the site would not occur, which would result in the same level of demand for public services and utilities as previously anticipated and planned for the site. Additionally, the proposed project would adhere to Section 15.26.200 of the City of Livermore Municipal Code which requires all newly constructed buildings within the City to be all-electric. Therefore, overall, impacts associated with land use, planning, population, housing, public services, and utilities as a result of the proposed project would be the same as what was identified in the 2007 IS/MND, as amended in 2017.

Based on the above, the proposed project would not result in any changes, new circumstances, or new information that would involve new significant impacts or substantially more severe impacts related to land use and planning, population and housing, public services, or utilities from what has been anticipated for the project site in the 2007 IS/MND, as amended in 2017. .

### **Hydrology and Water Quality**

The disturbance area associated with the proposed project would be the same as what has been anticipated for the site in the 2007 IS/MND, as amended in 2017. Accordingly, short-term construction-related impacts associated with hydrology and water quality as a result of buildout of the project site would be the same as what has been anticipated previously. In addition, the same amount of impervious surface area and associated stormwater runoff would be expected on the site as a result of the proposed project compared to what is already anticipated. Therefore, the same impacts related to operational hydrology and water quality would occur under the proposed project as compared to what was anticipated for the site in the 2007 IS/MND, as amended in 2017. Overall, impacts associated with hydrology and water quality as a result of the proposed project would be the same as what was identified in the 2007 IS/MND, as amended in 2017.

Based on the above, the proposed project would not result in any changes, new circumstances, or new information that would involve new significant impacts or substantially more severe impacts related to hydrology and water quality from what has been anticipated for the project site in the 2007 IS/MND, as amended in 2017.



## **Remaining Impact Areas**

Because the disturbance area associated with the proposed project would be the same as what is anticipated for the site in the 2007 IS/MND, as amended in 2017, the proposed project would involve the same level of impacts associated with buildout of the site related to the conversion of or conflicts associated with agricultural land/farmland, the potential discovery of previously unknown cultural or tribal cultural resources, the suitability of soils on the site for development, the presence of potentially hazardous conditions, mineral resources, recreation, and exacerbation of wildfire risks. For similar reasons, impacts associated with biological resources due to development of the site would also be the same as what is anticipated for the site in the 2007 IS/MND, as amended in 2017. However, because the pedestrian bridge would not be constructed under the proposed project, any impacts and associated mitigation measures identified in the 2007 IS/MND specific to the pedestrian bridge (e.g., Mitigation Measure 7.c.1 from the 2007 IS/MND) would no longer be required. All other mitigation measures related to biological resources set forth in the 2007 IS/MND and 2017 Addendum would remain applicable to the proposed project.

Accordingly, the proposed project would not result in any changes, new circumstances, or new information that would involve new significant impacts or substantially more severe impacts related to agriculture resources, biological resources, cultural and tribal cultural resources, geology and soils, hazards and hazardous materials, mineral resources, recreation, and wildfire from what has been anticipated for the project site in the 2007 IS/MND, as amended in 2017. Implementation of the mitigation measures set forth in the 2007 IS/MND and 2017 Addendum would continue to ensure impacts would be less than significant.

## **G. CONCLUSION**

As established in the discussions above regarding the potential effects of the proposed project, the proposed project would not result in any new significant information of substantial importance, new significant impacts, a substantial increase in the severity of previously identified significant impacts, or new mitigation measures from what was analyzed in the 2007 IS/MND, as amended in 2017. As such, the proposed project would not result in any conditions identified in CEQA Guidelines Section 15162, and a subsequent IS/MND is not required.

