



ADDENDUM I TO AN ADOPTED MITIGATED NEGATIVE DECLARATION

The County of El Dorado, California, a municipal corporation, does hereby prepare, make, declare, and publish the Addendum to an adopted Mitigated Negative Declaration (MND) for the following described project:

Project Name and Number: El Dorado County Placerville Jail Expansion

Original Project: El Dorado County Placerville Jail Expansion

The El Dorado County Planning Services Department has reviewed the proposed project modifications, and on the basis of the whole record before it, has determined that there is no substantial evidence that the modified project, as identified in this Addendum, would have a significant effect on the environment beyond that which was evaluated in the El Dorado County Placerville Jail Expansion MND (SCH# 2016122024) adopted in 2017. A Subsequent MND is not required pursuant to the California Environmental Quality Act of 1970 (Sections 21000, et. Seq., Public Resources Code of the State of California).

This Addendum to an adopted MND has been prepared pursuant to Title 14, Section 15164 of the California Code of Regulations. All technical reports used in support of the analysis in this Addendum are available for review at the El Dorado County Facilities Division.

**El Dorado County Placerville Jail Expansion Project
Addendum to an Initial Study/Mitigated Negative Declaration**

Project Location and Setting:

The proposed project would be located directly adjacent to the El Dorado County Jail at 300 Forni Road in Placerville, California (see Figure 1). The project site is located on a portion of an approximately 20-acre parcel identified by the El Dorado County Assessor as Assessor's Parcel Number (APN) 325-300-321. Access to the site would be provided by Jail Street, which connects the existing jail facility to Forni Road.

The existing jail is situated at the top of a hill and is surrounded by associated parking lots to the north, east, and west. The westernmost parking area is not available for public use. The project site is located adjacent to the northeast side of the existing jail facility on a gently sloped hill. The western portion of the site is enclosed by a chain-link, security fence, and covered with gravel. The remainder of the sloped site is covered with ruderal grasses. The area to the east of the project site is undeveloped and covered in ruderal grasses and scattered oak trees. A gravel access road extends along the south and east sides of the expansion site. South of the expansion site, off the jail property, is located a ravine with dense vegetation. A small paved parking lot is located north of the site.

Project Background:

On January 24, 2017, the County adopted the El Dorado County Placerville Jail Expansion IS/MND (SCH# 2016122024), hereafter referred to as the "2017 MND". The 2017 MND was prepared pursuant to Title 14, Section 15070 of the California Code of Regulations.

The 2017 MND analyzed the approved project, which includes construction of a two-story jail building that would connect to the northwest section of the existing jail facility. The jail building and all associated improvements would be located entirely within the existing County-owned jail property. The proposed expansion facility would include inmate housing areas with 54 beds, as well as administrative and staff support rooms, medical and mental health facilities, expanded inmate program areas, and ancillary mechanical, electrical, and janitorial rooms. The proposed medical and mental health facilities would include 14 beds. The project would not increase the inmate capacity of the jail, but rather redistribute the existing inmate population.

The stormwater runoff from the site's new impervious surfaces would be directed to a new on-site stormwater management system. Treated runoff may be transported to an existing stormwater man-hole via new storm drain pipes. The project would include a connection to the existing sewer line running along the northeast side of the existing jail facility. Water service would be provided through a new connection to an existing eight-inch water line in the parking lot to the north. Parking for the proposed project would be provided by the existing paved parking lots to the north and northwest of the site. The project would use the existing circulation systems associated with the existing jail facility, and would not modify access to the existing jail facility.

Figure 1
Regional Project Location



Specific entitlements of the original El Dorado County Placerville Jail Expansion Project included the authorization of County staff to submit the application to the Board of State and Community Corrections (BSCC) for Senate Bill (SB) 844 grant funding. The El Dorado County Facilities Department reviewed the project and, on the basis of the 2017 MND, did not find substantial evidence that the project, with mitigation measures, would have a significant effect on the environment.

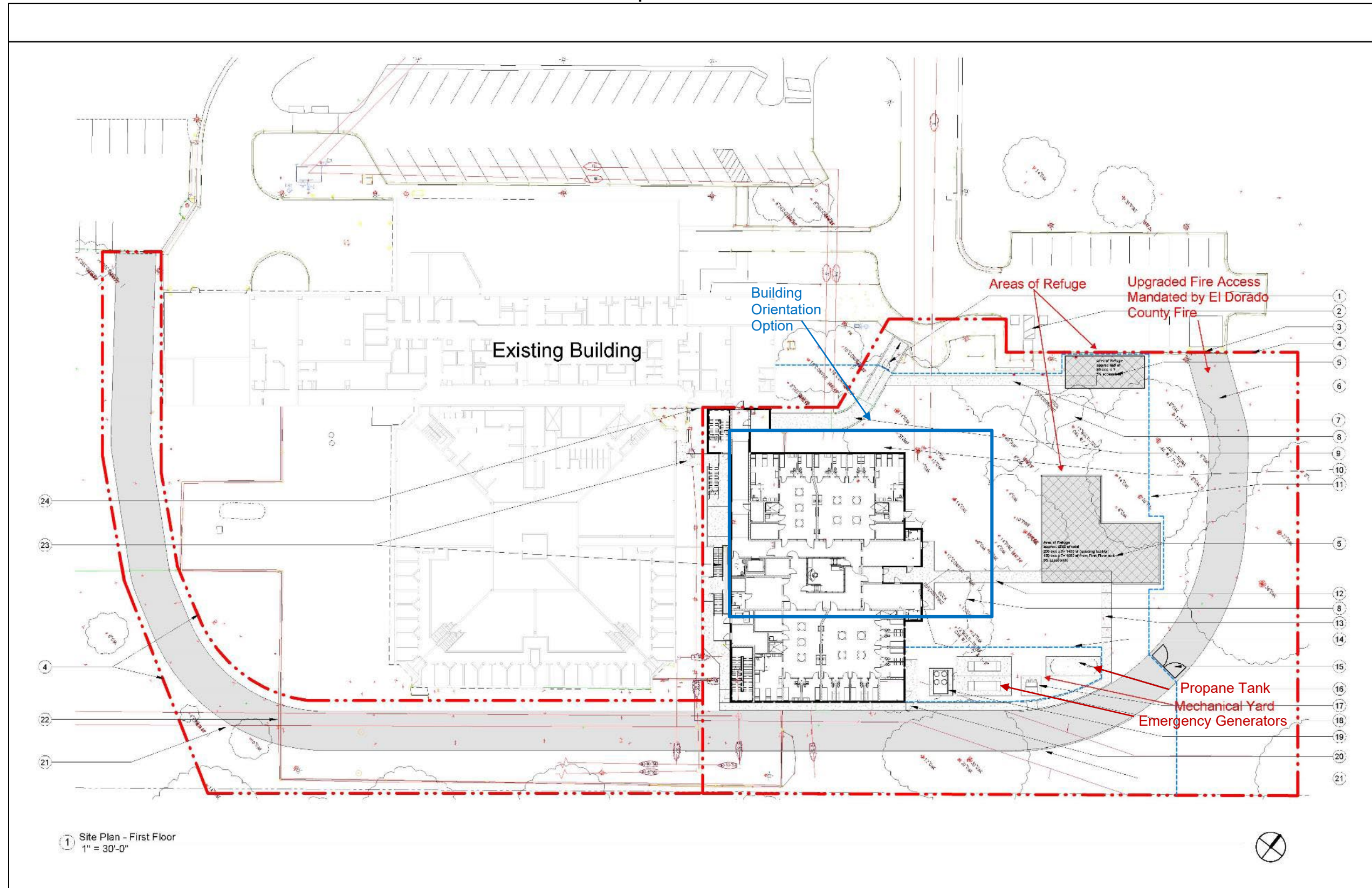
Proposed Changes to the Project:

Since the adoption of the 2017 MND, the El Dorado County Facilities Division has commenced design-level drawings, coordinating closely with applicable state and local agencies. During this design-level process, the BSCC has identified the need to include “areas of refuge” (e.g., for temporary emergency evacuation of inmates during fire incident) to the east of the formerly identified jail expansion area. In addition, the El Dorado County Fire District (EDCFD) is mandating upgrades to the existing fire access road along the site’s eastern and southern boundaries. Due to the aforementioned requirements, the original anticipated grading and site work for the project would be greater than what was analyzed in the 2017 MND and would include the removal of on-site mixed oak woodland, including two Heritage trees. It should be noted that there are currently two options being considered for the orientation of the proposed jail expansion building, shown in Figure 4 below. This Addendum addresses both options, and includes the entire potential impact area in the analysis. The proposed changes to the project design from the currently approved project include the following:

- Dedication of 3,165 sf for use as areas of refuge, which would include approximately 160 square feet (sf) for paved pathways to the dirt or grass refuge areas. The proposed areas of refuge would be located to the east and northeast of the proposed building, as shown in Figure 4;
- An upgraded 20-foot wide fire access road, as mandated by the EDCFD. The project would improve the existing gravel access road by placing four inches of asphalt concrete over 11 inches of aggregate base. Both materials would meet Caltrans specifications;
- A new mechanical yard on the southeast corner of the site, which would include:
 - The addition of one 1,000-gallon propane tank on a concrete pad on the southeast corner of the site. The approved project did not include a propane tank; and
 - One additional emergency generator. The approved project included one larger generator, but the County has elected to instead use two smaller generators to provide redundancy. Both generators would be installed in a weatherproof, Level 1 sound attenuated enclosure on the southeast corner of the site.

The updated site plan is included as Figure 4 below.

Figure 2
Updated Site Plan



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, State CEQA Guidelines Section 15164 (Addendum to an EIR or MND) states:

- (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 Negative Declaration or supplemental MND 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 MND 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.

Addendum Where New Impacts Have Been Identified

Under CEQA Guidelines Section 15164, an addendum to a previously certified EIR or MND may be prepared if changes or additions are necessary, but none of the conditions under Section 15162 requiring preparation of a subsequent Negative Declaration have occurred. As noted above, under Section 15162, subdivision (a)(3), a subsequent Negative Declaration must be prepared if new information of substantial importance shows the project would have one or more significant effects not discussed in the previous MND.

Under case law interpreting Section 15162, where the only basis for preparing a subsequent Negative Declaration or a supplement to a Negative Declaration is a new significant impact or a substantial increase in the severity of a previously identified impact, the need for the new Negative Declaration can be avoided if the project applicant agrees to one or more mitigation measures that can reduce the significant effect(s) at issue to less-than-significant levels. See *River Valley Preservation Project v. Metropolitan Transit Development Board* (1995) 37 Cal.App.4th 154, 168 [“[E]ven a substantial increase in the severity of an environmental impact does not require...the preparation of [a subsequent EIR] if mitigation measures are adopted which reduce the impact to a level of insignificance”], citing *Laurel Heights Improvement Association v. Regents of the University of California* (1993) 6 Cal. 4th 1112, 1130); see also *Snarled Traffic Obstructs Progress v. City and County of San Francisco* (1999) 74 Cal. App. 4th 793, 802 [upholding trial court finding that new and negative aesthetic impacts of increased footprint of project were “potential impacts [that] do not rise to the level of significance because they were mitigated by the project sponsor’s modification of the project”].)

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. If it does, the lead agency moves on to determine whether the original document is adequate for CEQA purposes. El Dorado County has determined that the 2017 MND adopted for the El Dorado County Placerville Jail Expansion Project is relevant and has prepared an addendum to that document to evaluate the proposed project. The project discussed in this Addendum would result in similar impacts as identified in the 2017 MND.

Based on the above, in accordance with Sections 15162 through 15164 of the CEQA Guidelines, the proposed improvements would not require major revisions to the previous 2017 MND due to

the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects. As discussed in this Addendum, 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.

Discussion:

According to CEQA Guidelines Section 15164, an addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary. As such, it is not necessary for this addendum to evaluate in detail all of the CEQA topics contained in Appendix G of the CEQA Guidelines. Rather, it is appropriate to focus the substance of this addendum onto those topics that require minor technical changes or additions based upon the proposed modifications of the approved project. The primary environmental topic that would be affected by the modifications to the project is biological resources, specifically tree resources. Thus, the majority of this addendum will focus on the effects of the proposed modifications on tree resources. Following this discussion, the addendum will present an overview of the remaining CEQA topics and evidentiary support to demonstrate that the modifications to the project would not alter the conclusions of the adopted IS/MND for any of the remaining topic areas.

Biological Resources

The proposed changes to the approved project would result in a greater area of disturbance from what was assumed for the 2017 MND analysis; however, due to the disturbed nature of the site and the lack of suitable habitat, similar to the conclusions of the 2017 MND, special-status species would not be expected to occur within the potential maximum area of disturbance. Notwithstanding, the adopted IS/MND concluded that construction of the approved project has the potential to result in impacts to birds and their nests protected under California Fish and Wildlife Code (Sections 3503, 3503.5, 3513), and the Migratory Bird Treaty Act (MBTA). Specifically, the IS/MND concludes (pg. 31) that the oak trees bordering the east side of the proposed project site could provide habitat for nesting raptors and migratory birds, which could be disturbed as a result of the project should they be nesting in the off-site trees during construction activities. These trees referenced in the IS/MND are now within the proposed expanded disturbance area. The 2017 MND included Mitigation Measures IV-1(a) through IV-1(c), which require pre-construction raptor and nesting surveys and implementation of a construction buffer in order to ensure that impacts related to nesting raptors or migratory birds associated with the existing trees bordering the east side of the previously approved project site would be reduced to less-than-significant levels. Implementation of Mitigation Measures IV-1(a) through IV-1(c) of the 2017 MND would still be required for the proposed project and would be sufficient to ensure that the proposed removal of trees would not result in more severe impacts related to nesting or migratory birds protected under the MBTA. Therefore, the proposed project would not result in any changes that would involve new significant impacts or substantially more severe impacts related to a substantial adverse effect, either directly or through habitat modifications, on species identified as a candidate, sensitive, or special-status in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.

As noted above, the proposed revisions to the project would involve removal of trees, which was not included as part of the approved project. The 2017 MND (Section IV, question 'e') includes Mitigation Measure IV-2, which requires appropriate tree protection measures for the nearby oak trees that were anticipated to remain, but did not identify any impacts or require mitigation related to the removal of oak trees or oak woodlands.

El Dorado County regulates impacts to oak trees and woodlands through the Oak Resources Management Plan (ORMP) and the Oak Conservation Ordinance (No. 5061). The purpose of the ORMP is to define mitigation requirements for impacts to oak resources, including oak woodlands, individual native oak trees, and Heritage trees, and to outline strategies for oak woodland conservation. In El Dorado County, an oak woodland removal permit is required for projects that would remove any trees that are a component of an oak woodland. "Oak woodland" is defined by the California Fish and Game Code Section 1361 as an oak stand with greater than 10 percent canopy cover, or that may have historically supported greater than 10 percent canopy cover. Mitigation for oak woodland removal required by the ORMP is based on the percent of oak woodland impacted by the project.

The ORMP also requires mitigation for the removal of Heritage trees, regardless of whether the Heritage tree is located inside or outside an oak woodland. The ORMP defines Heritage trees as any live native oak tree with a single main trunk measuring 36 inches diameter breast height (dbh) or greater, or with a multiple trunk and an aggregate trunk dbh measuring 36 inches or greater.

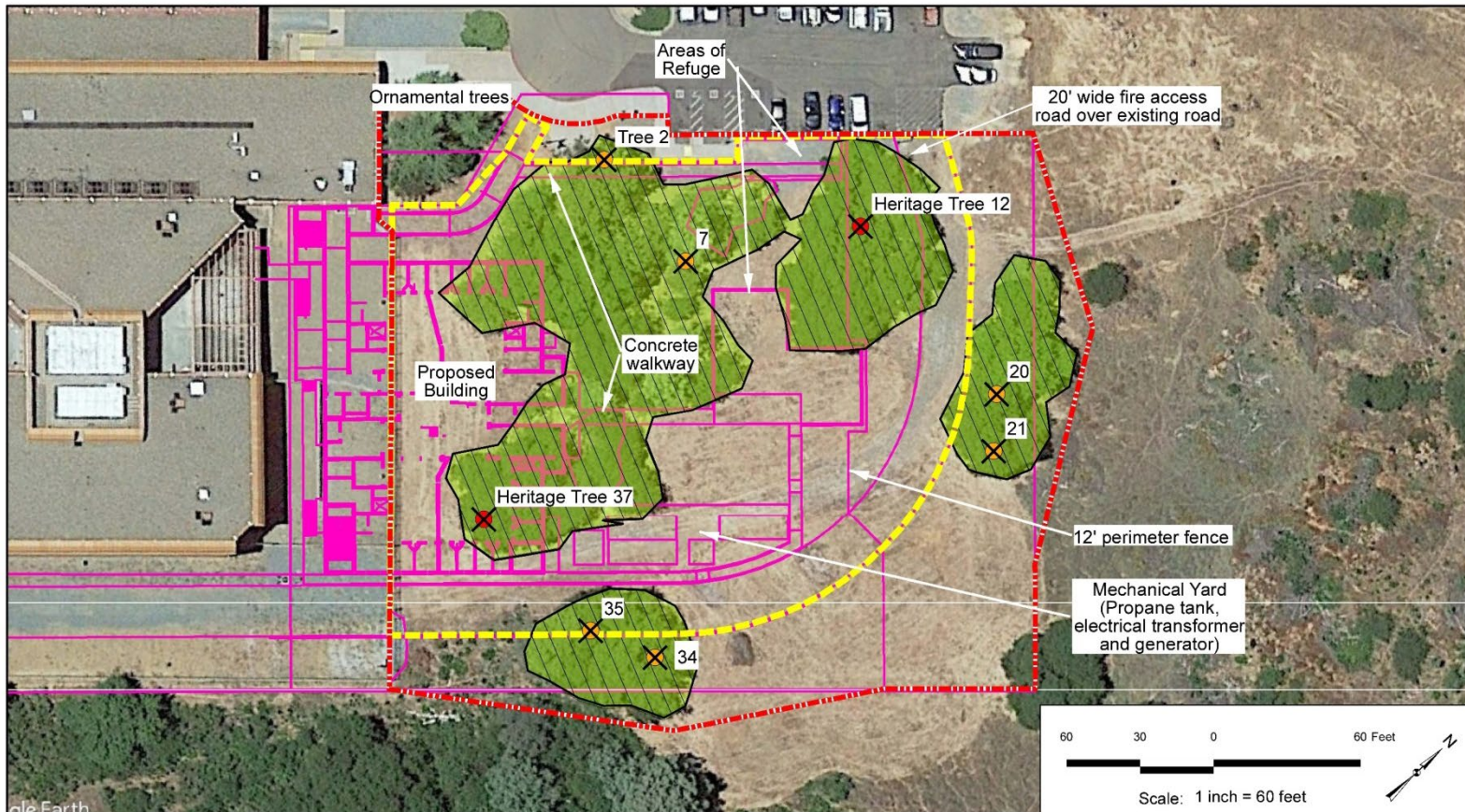
In order to determine the project's potential impacts to oak trees and woodlands, an Oak Resources Technical Report was prepared by Sycamore Environment Consultants (see Attachment 2 to this Addendum), consistent with Section 2.5 of the ORMP. On March 21, 2020, Sycamore Environmental Consultants conducted a field survey and collected data on oak woodlands and trees within the biological study area, as shown in Figure 5. The biological study area was intentionally defined to cover the maximum possible extent of disturbance. The possibility exists for the impact area to be reduced, as the County proceeds with the design phase of the project.

For each tree included in the survey, the species, diameter at breast height (dbh), dripline (canopy radius), height, and a general assessment of health and structure condition was recorded. Dbh was measured at 4.5 feet above the ground, unless a tree characteristic, such as a branch attachment, interfered with the measurement at that height. Tree condition was judged in five categories with respect to structure, health, vigor, defects, and conformance to generally accepted arboricultural standards of care, disease, general health, damage, danger of falling, and suitability for retention in a developed area.

According to the field survey and canopy mapping, a 0.55-acre mixed oak woodland is located within the study area (see Figure 5). The oak woodland consists primarily of blue oak (*Quercus douglasii*) and interior live oak (*Quercus wislizeni*), with a few black oak (*Quercus kelloggii*) trees. The oak trees within the study area range from six to 102 inches dbh, and two interior live oaks (Tree #12 and #37) meet Heritage tree criteria.

This analysis conservatively assumes that construction of the proposed project would impact the entire 0.55-acre of oak woodland on-site, as well as the two Heritage trees. Depending on vehicle clearance along the access road, some trees may need to be entirely removed or simply pruned for access to the site. In order to comply with the requirements set forth by the County's ORMP and the Oak Conservation Ordinance, an additional project-specific mitigation measure would be required, presented below as Mitigation Measure IV-3.

Figure 3
Oak Tree and Oak Woodland Locations



El Dorado Co. Recovery,
Rehab., Reentry Facility
City of Placerville, CA
April 2020

Oak Woodland Impacts

- Biological Study Area (BSA; 1.49 ac)
- Proposed Project
- Limits of Project Disturbance
- Oak Woodland Canopy (0.55 ac)
- Impacted Oak Woodland (0.55 ac)
- Oak Tree (24-36" dbh)
- Heritage Tree (36+ inch dbh)
- ✕ Tree to be removed



Site Plan: El Dorado Co. Recovery,
Rehab., Reentry Facility Plans
CAD FILE: El Dorado Co-Jail - Existing
Site Plan.dwg (Rev'd: 25 March 2020)
Provided by: Raney Planning & Management
Aerial Photographs:
26 June 2018, Google Earth Imagery

20200503 JailExpansion_OakWoodland(8x11).mxd

Two to three retained trees, including oaks and gray pine (*Pinus sabiniana*), are located in the southern corner of the biological study area, south of the proposed fire access road, within 30 feet of trees assumed to be impacted. Tree preservation measures would be required for retained trees. Mitigation Measure IV-2 of the 2017 MND required tree protection measures to be implemented. Based on the Oak Resources Technical Report prepared for this Addendum, Mitigation Measure IV-2 of the 2017 MND has been revised to provide additional details regarding tree preservation methods, as presented below.

With implementation of the below mitigation measures, 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 biological resources from what has been anticipated for the project site in the previous CEQA documents.

Modified/Additional Project-Specific Mitigation Measure(s)

Implementation of the following mitigation measures would ensure impacts related to a conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, would remain less-than-significant, as identified in the 2017 MND. The El Dorado County Oak Conservation Ordinance and ORMP encourage on-site oak retention and discourage any unnecessary removal of oak trees by charging an in-lieu mitigation fee for the removal of oak trees and oak woodlands (El Dorado County 2017). The Project intends to mitigate for impacts to oak woodlands through payment of in-lieu fees to the County's Oak Woodland Conservation Fund. The County ORMP and Oak Ordinance require a 2:1 mitigation ratio of impacted oak woodland for projects that impact greater than 75 % of on-site oak woodland.

Modified Mitigation Measure

IV-2 *The following construction policies and guidelines for tree preservation and protection shall be followed during project implementation:*

- *The construction drawings shall identify the location of the tree trunk and dripline of all oak trees in the immediate vicinity of the site disturbance area.*
- *A Bright colored flagging or a protective fence shall be installed around all oak trees adjacent to the disturbance area. The protective fence shall be installed prior to commencement of any construction activity and shall remain in place for the duration of construction. Flagging or fencing shall be removed and cleared from the Project area upon completion of the project to prevent wildlife entrapment and refuse left onsite.*
- *Grading, excavation, deposition of fill, erosion, compaction, and other construction-related activities shall not be permitted outside the limits of project disturbance/within the dripline or at locations which may damage the root system of oak trees.*
- *Oil, gas, chemicals, vehicles, construction equipment, machinery, and other construction materials shall not be allowed within the dripline of oak trees.*
- *Limb pruning of any retained trees should be conducted by an arborist or tree worker that is ISA certified and licensed by the State of California for tree service. Pruning shall be conducted in accordance with American National Standard Institute (ANSI) A300 Pruning Standard and adhere to the most recent edition of ANSI Z133.1.*

- Trees planned for removal shall be felled inside the limits of project disturbance.
- *In the event that oak trees outside the limits of project disturbance are inadvertently damaged such that removal is required, replacement trees shall be planted, as determined by the Community Development Agency.*

New Mitigation Measure

IV-3 *Prior to issuance of an oak woodland removal permit, the El Dorado County Facilities Division shall pay the appropriate in-lieu fees to the El Dorado County Community Development Agency (CDA), as determined by the CDA, based upon final construction drawings, consistent with the following County Oak Resources Management Plan requirements:*

- *2:1 mitigation ratio for the loss of oak woodlands on-site per acre impacted;*
and
- *3:1 mitigation ratio per dbh inch of Heritage tree impacts.*

The fee shall be based on the fee amount in effect at the time of issuance of the oak woodland removal permit.

Remaining Environmental Resource Areas

The 2017 MND analyzed impacts of the project related to air quality, and concluded that the approved project would result in a less-than-significant impact. One of the proposed changes to the project involves the inclusion of two diesel-powered emergency generators, which would be placed closer to receptors, as opposed to the previously-approved single diesel generator. Such changes could affect emissions of criteria pollutants during project operations, as well as the exposure of sensitive receptors to excess pollutant emissions.

Construction emissions may increase as a result of the proposed changes, due to the increased amount of paving and increased area of disturbance. As noted in the 2017 MND, construction emissions from the approved project were modeled to be 4.61 lbs/day of ROG and 18.87 lbs/day of NO_x, which is significantly lower than the applicable 82.0 lbs/day EDCAQMD threshold of significance for both criteria air pollutants. Therefore, the small anticipated increase in emissions related to implementation of the proposed changes is not expected to result in a considerable difference, and air quality impacts during construction would remain less than significant.

In addition, the operational emissions were previously modeled to be 4.09 lbs/day of ROG and 9.00 lbs/day of NO_x, as compared to the 82.0 lbs/day EDCAQMD threshold of significance. As such, operational emissions would fall substantially below the applicable thresholds of significance. It should be noted that the two generators would be smaller than the one generator that was previously analyzed. However, even if the additional generator were conservatively assumed to be the same size as the originally-proposed generator, the doubling of generator-related emissions would not increase operational emissions to a level that would exceed the thresholds of significance. In addition, as noted in the 2017 MND, the generators are intended for use only during emergencies and maintenance testing. Overall, because the operational emissions are expected to be substantially below thresholds, the addition of another emergency generator would not substantially increase criteria air pollutant emissions, and the impact would remain less than significant.

While in use, the emergency generators would emit diesel particulate matter, a known toxic air contaminant (TAC). The location of the proposed generators would be 150 feet closer to the nearest residential receptors than what was previously analyzed. As a result, the generators would be located approximately 370 feet from the residential building to the east, rather than 520 feet away, as analyzed in the 2017 MND. However, per the required EDCAQMD permit, the generators would be regulated and monitored to ensure any associated emissions are under specified limitations. In addition, as noted above, the generators are intended to be used only for emergency situations and for maintenance and testing purposes. The strictly limited use of the generators would reduce the total amount of TAC emissions that would be released following installation of the generators. Furthermore, as discussed above, because the additional generator would not increase operational criteria pollutant emissions to a level that would exceed the applicable thresholds, the net change in associated emissions would not be considered substantial. As such, impacts related to TAC emissions would remain less than significant, as concluded in the 2017 MND.

Based on the 2017 MND, given the extent of known cultural and tribal cultural resources and the environmental setting of the project area, low potential exists for locating such resources in the vicinity of the project area. Because the area of ground disturbance would be greater than what was previously analyzed in the 2017 MND, the potential to encounter any previously unknown cultural or tribal cultural resources during construction activities could increase. Implementation of Mitigation Measures V-1(a), V-1(b), and V-2 of the 2017 MND would still be required for the proposed project and would be sufficient to ensure that any impacts related to cultural and tribal cultural resources as a result of the proposed project would be reduced to a less-than-significant level. Generally, these mitigation measures require that if any archeological resources, or human remains are found during construction activities, construction work in the vicinity of the find shall cease until the applicable expert (i.e., qualified archeologist or County Coroner) can determine the appropriate course of action. Therefore, the proposed project would not result in any changes that would involve new significant impacts or substantially more severe impacts related to cultural or tribal cultural resources from what was analyzed in the 2017 MND.

Impacts related to geology and soils were addressed in the 2017 MND, which concluded that less-than-significant impacts would result related to: exposing people or structures to potential substantial adverse effects involving rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, or landslides; being located on unstable soils that could result in landslides, lateral spreading, subsidence, liquefaction, or collapse; or having soils incapable of supporting septic tanks. The project site is known to include soils with low to moderate shrink-swell potential and, thus, a potentially significant impact would occur without the implementation of Mitigation Measure VI-2, which requires the preparation of a geotechnical report and incorporation of its design-level recommendations into construction drawings, prior to construction. Because the proposed project would be located on the same site as what was analyzed previously, the aforementioned conclusions and mitigation measures would remain the same. The proposed project would involve a larger area of ground disturbance compared to the approved project. As a result, the risk of erosion or loss of topsoil due to excavation and grading would be increased. However, Mitigation Measure VI-1, which requires the development and implementation of an erosion control plan, would remain applicable, and would be sufficient to ensure that any potential impacts related to erosion or loss of topsoil would be reduced to a less-than-significant level. As such, impacts related to erosion would remain consistent with the conclusion of the 2017 MND.

The proposed 1,000-gallon propane tank was not analyzed in the 2017 MND, and could result in impacts related to hazards and wildfire risk. However, the propane tank use and storage would

be subject to all applicable regulations. For instance, the placement of the propane tank would be required to comply with the regulations within the California Fire Code and any container setback requirements therein. In accordance with such regulations, the tank would be placed on a concrete pad, set back from the building, and located in an enclosure to reduce wildfire risk to the maximum extent feasible. In addition, the EDCFD would review the improvement plans and propane tank placement as part of their standard review procedure. As such, impacts related to hazardous materials and wildfire risk would remain consistent with the conclusions within the 2017 MND.

The proposed changes to the project would result in a greater area of disturbance and more impervious surfaces than the approved project. The aforementioned conditions could increase the rate or amount of surface runoff or provide substantial additional sources of polluted runoff, as compared to the levels anticipated for the approved project. However, as noted in the adopted IS/MND (p. 51), the project is subject to Phase II MS4 NPDES permit postconstruction stormwater treatment requirements. Regulated Projects are required to divide the project area into Drainage Management Areas (DMAs) and direct water to appropriately-sized Site Design Measures (SDMs) and Baseline Hydromodification Measures to each DMA to the Maximum Extent Practicable (MEP). SDMs and Baseline Hydromodification Measures for Regulated Projects shall be based on volumetric and/or flow-based sizing criteria for the objective of achieving infiltration, evapotranspiration, and/or harvesting/reuse of the 85th percentile 24-hour storm runoff event.

Mitigation Measure IX-1 of the 2017 MND requires that, prior to approval of construction drawings, the Facilities Division shall submit to the Community Development Agency a Post Construction Stormwater Plan. The Post Construction Stormwater Plan would require identification of all DMAs, SDMs, and Baseline Hydromodification Measures to ensure appropriate capture and treatment of stormwater runoff. The Post Construction Stormwater Plan would reflect the final design of the project, including the modifications outlined in this Addendum. Thus, implementation of Mitigation Measure IX-1 would remain sufficient to reduce any potential impacts related to hydrology and water quality to a less than significant level, consistent with the conclusions of the 2017 MND.

Section XII, Noise, of the 2017 MND notes that maintenance of the emergency generator could exceed non-transportation noise standards within the County's General Plan. Considering the updated project would include an additional generator, and would place the generators 150 feet closer to the nearest sensitive receptors, the impact would remain potentially significant. However, the generators would be installed in a Level 1 sound-attenuated enclosure, which would reduce operational noise levels. In addition, outside of emergency situations, the generator would only be used for maintenance and testing purposes, which is not expected to exceed bi-weekly 30-minute tests, and triennial four-hour tests. Because the generators would only be used for emergency situations and routine short testing intervals, the emergency generators are not anticipated to expose nearby receptors to a substantial permanent increase in ambient noise levels. Furthermore, Mitigation Measure XII-4(a), which requires that maintenance-related use of the emergency generators be limited to specific allowable hours, would remain applicable. Mitigation Measure XII-4(b) requires that generator-related noise shall not exceed 85 dB at a distance of ten feet to ensure compliance with County noise standards. As with the 2017 MND, implementation of Mitigation Measures XII-4(a) and XII-4(b) would reduce impacts from generator-related noise to a less-than-significant level.

Because the proposed project would include a similar development intensity, impacts related to the remaining issue areas would be similar to what was anticipated for development of the site per the 2017 MND: aesthetics; population and housing; public services; transportation and circulation; utilities and service systems; and cumulative impacts. The project location and

intended land use is the same as the original project, and thus, less than significant impacts to agriculture, land use, and mineral resources would remain the same as what was previously analyzed.

Environmental Findings

As presented in the discussions above, the proposed project would not result in any new significant information of substantial importance, new impacts, or an increase the severity of previously identified significant impacts to any CEQA topic areas that would require major revisions to the 2017 MND. The feasibility of mitigation measures or alternatives previously identified would not be modified with implementation of the proposed project, and the additional mitigation measure that has been imposed herein is sufficient to reduce the new tree-related impact to a less-than-significant level. In addition, the proposed project would be required to implement all applicable mitigation measures set forth in the 2017 MND. As a result, new information of substantial importance, which was not known and could not have been known at the time the previous CEQA document was prepared, has not come to light from what has been previously analyzed.

Conclusion

As established in the discussions above regarding the potential effects of the proposed project modifications, the proposed modified project would not result in any new significant information of substantial importance, new impacts, new or revised alternatives, or an increase in the severity of previously identified significant impacts that would require major revisions to the 2017 MND. As such, the proposed modified project would not result in any conditions identified in CEQA Guidelines Section 15162, and a subsequent MND is not required.

Based on the above analysis, this Addendum to the previously-adopted 2017 MND for the project has been prepared.

Attachments:

- 1. 2017 MND**
- 2. Oak Resources Technical Report**