

ATTACHMENT 3

**CEQA ADDENDUM TO THE
MITIGATED NEGATIVE DECLARATION FOR THE COMMERCIAL MEDICINAL MARIJUANA LAND USE
ORDINANCE**

**Commercial Medical Marijuana Land Use Ordinance Mitigated Negative Declaration (MND)
(State Clearinghouse # 2015102005), January 2016**

**APN 208-113-008; 3611 Little Larabee Creek Road, Bridgeville area
County of Humboldt**

**Prepared By
Humboldt County Planning and Building Department
3015 H Street, Eureka, CA 95501**

August 2024

Background

Modified Project Description and Project History – The Commercial Medical Marijuana Land Use Ordinance (CMMLUO) established specific regulations for commercial cannabis operations in Humboldt County. These regulations were developed in concert with the Mitigated Negative Declaration (MND) that was adopted for the ordinance to implement the mitigation measures of the MND. The MND addressed the broad environmental impacts that could be expected to occur from the adoption and implementation of the ordinance. The MND specified that the regulations established in the CMMLUO would mitigate the impacts of existing cannabis operations by establishing regulations for an existing unregulated land use to help prevent and reduce environmental impacts that are known to result from unpermitted baseline cultivation operations. Commercial cannabis cultivation in existence as of December 31, 2015, was included in the environmental baseline for the MND and the MND states that “Bringing existing operations into compliance will help to attenuate potential environmental effects from existing cultivation activities, including aesthetic impacts resulting from improper operation or poor siting.” The current project was contemplated by the MND and compliance with the provisions of the CMMLUO will fully mitigate all environmental impacts of the project to a less than significant level.

The modified project involves a Conditional Use Permit for an existing 28,625 square foot (SF) mixed light and outdoor cannabis cultivation (limited to a maximum of 11,500 SF of mixed light cultivation), including a maximum of 2,863 SF of ancillary propagation. Irrigation water is sourced from a stream diversion, wells and rainwater catchment. A 400,000-gallon rainwater catchment pond is proposed. Existing available water storage is 62,000 gallons in a series of hard-sided tanks, and there will be 462,000 gallons of onsite water storage with development of the proposed pond. Estimated annual water usage is 270,500 gallons. Processing occurs onsite. A maximum of fifteen (15) employees will be required during peak operations. Power is provided by three (3) generators and supplemented by solar; however, the applicant plans to fully convert to solar by the end of 2025. A Special Permit is also requested for development within the Streamside Management Area (SMA) for continued use and maintenance of the point of diversion infrastructure.

No known significant archaeological resources are in the project area. The project is within the historic aboriginal territory of the Bear River Band of the Rohnerville Rancheria. The project was referred to the Northwest Information Center (NWIC) at Sonoma State and the Bear River Band of the Rohnerville Rancheria in October 2017. Ongoing conditions of approval are incorporated regarding the inadvertent discovery protocol to protect cultural resources, consistent with comments received from the Bear River Band of the Rohnerville Rancheria in April 2018.

The project site contains riparian habitat associated with Little Larabee Creek and an unnamed tributary of Little Larabee Creek, which traverse the western portion and northwesternmost corner of the subject parcel. All approved cannabis cultivation activities and most respective infrastructure would occur outside of the required stream setbacks. As described in the Water Resource Protection Plan (WRPP; WDID 1B170161CHUM) prepared by Natural Resources

Management Corporation (NRM) in October 2017, cultivation occurs either on graded flats or natural landings, which are typically indicative of slopes less than 5%. The Nearest Northern Spotted Owl (NSO) positive observation is located approximately 0.08 miles from the nearest cultivation area, with the nearest NSO activity center located approximately 0.54 miles away. Artificial lighting is used to support the mixed light cultivation and ancillary propagation areas. Power is provided by three (3) generators and supplemented by solar; however, the applicant plans to fully convert to solar by the end of 2023. Conditions of approval require the applicant use light and noise attenuation to ensure the project has a Less than Significant Impact on NSO. The applicant has enrolled with the State Water Resources Control Board Cannabis Cultivation Policy.

The modified project is consistent with the adopted MND for the CMMLUO because it complies with all standards of the CMMLUO which were intended to mitigate impacts of existing cultivation. These include ensuring supplemental lighting and security lighting adheres to Dark Sky Association standards and ensuring project related noise does not harass nearby wildlife which will limit impacts to biological resources as a result of light and noise.

Purpose - Section 15164 of the California Environmental Quality Act (CEQA) provides that the lead agency shall prepare an addendum to a previously certified Mitigated Negative Declaration (MND) if some changes or additions are necessary but none of the conditions described in Section 15162 calling for a subsequent EIR or Negative Declaration have occurred. Section 15162 states that when an EIR has been certified 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 require major revisions of the previous MND 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 MND 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 MND was certified as complete, shows any of the following: A) the project will have one or more significant effects not discussed in the previous MND; B) significant effect previously examined will be substantially more severe than shown in the previous MND; 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 MND would

substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Summary of Significant Project Effects and Mitigation Recommended

A review of Appendix G impacts:

Aesthetics: The project is for 28,625 SF of existing mixed light and outdoor cannabis cultivation (limited to a maximum of 11,500 SF of mixed light cultivation), including a maximum of 2,863 SF of ancillary nursery space. The project will not significantly impact scenic vistas or public views as the project will occur in an area that is surrounded by forested land. The project is consistent with the agricultural visual character of the area. The project will not create a source of light or glare. Less than significant impact.

Agriculture and Forestry Resources: The project involves an agricultural activity on a parcel zoned as Timberland Production Zone (TPZ), in which all general agricultural uses are principally permitted. The project will not convert prime farmland or conflict with existing zoning for agricultural use or Williamson Act contract. The project will not result in the loss of forest land or conversion of forest land to non-forest use, as conditions of approval require post-2016 timber conversion to be properly mitigated and restocked at a 3:1 ratio, and no additional timber conversion is requested or authorized under the permit. Less than significant impact.

Air Quality: Minimal construction activities are associated with the project. Construction activities included development of the cultivation and nursery spaces, storage areas, and water storage tanks, which required minimal grading for placement. Under the project, additional greenhouses, employee housing, and an additional processing facility are proposed, in addition to installation of the 400,000-gallon rainwater catchment pond proposed, which will require excavation. The project will not expose sensitive receptors to pollutants or create objectionable odors affecting a substantial number of people. The project would not result in significant sources of greenhouse gas emissions. The project does utilize a gravel road, and traffic on gravel roads contribute to PM₁₀, for which the North Coast Air Basin is already in non-attainment. However, there will be a maximum of fifteen (15) employees onsite during peak operations. Employees will continue to travel daily to and from the site until development of the employee housing occurs; however, at that point traffic trips will be reduced. However, as this is an existing operation, a significant increase in traffic is not expected under the project. As such, the continued use of the gravel road for the project is not a substantial change or additional significant impact not considered under the MND for the CMMLUO. Less than significant impact.

Biological Resources: The project is in the Bridgeville area in proximity of Little Larabee Creek. Little Larabee Creek and an unnamed tributary of Little Larabee Creek traverse the western portion and northwesternmost corner of the subject parcel, and all cultivation activities and respective infrastructure are located outside of the required Streamside Management Area (SMA) buffers.

Surrounding lands include private timberland. As described in the Water Resource Protection Plan (WRPP; WDID 1B170161CHUM) prepared by Natural Resources Management Corporation (NRM) in October 2017, the gardens occur either on graded flats or natural landings, which are typically indicative of slopes less than 5%.

Per review of CDFW's California Natural Diversity Database (CNDDB) in October 2022, the cultivation areas are mapped within potential habitat for the American peregrine falcon (*Falco peregrinus anatum*) and three-ranked hump moss (*Meesia triquetra*). Additionally, the nearest Northern Spotted Owl (NSO) sighting is located approximately 0.08 miles from the nearest cultivation area, with the nearest NSO activity center located approximately 0.54 miles away. Per the Biological Report prepared by Natural Resource Management Corporation in October 2018, no listed wildlife species or special status species were detected during the survey. While the project has the potential to affect sensitive species, if present within the project vicinity, the Report concludes that potential impacts to sensitive species would be minimal if recommendations included in the Report are implemented. Conditions of approval require the applicant to implement noise and light attenuation measures, including but not limited to the use of noise containment structures, noise level requirements, and required compliance with International Dark Sky Association standards for any artificial lighting utilized for the project. In addition, the applicant is required to refrain from using synthetic netting, ensure refuse is contained in wildlife proof storage, and refrain from using anticoagulant rodenticides to further protect wildlife. It was determined that the project and operations will have less than significant impacts with adherence to the recommended conditions of approval. Less than significant impact.

Cultural Resources: No known cultural resources are located within the project area. However, the project will adhere to the Inadvertent Discovery Protocol in the event of inadvertent discovery of resources, as recommended by the Bear River Band of the Rohnerville Rancheria in April 2018. Less than significant impact.

Energy: The project is for mixed light and outdoor cannabis cultivation with on-site propagation, drying, and processing activities. Although power is currently provided by three (3) generators and solar, the applicant has plans to fully convert to solar power by the end of 2023. The project would continue to utilize a generator for emergency purposes which is not uncommon for agricultural operations in rural areas. Less than significant impact.

Geology and Soils: No new structures are proposed that would expose people to risk of life from earthquakes. The gardens occur either on graded flats or natural landings, which are typically indicative of slopes less than 5%, and cultivation activities are limited to the immediate area surrounding the greenhouses and gardens. Additionally, irrigation runoff and erosion control measures are implemented. Less than significant impact.

Greenhouse Gas Emissions: The project currently utilizes three (3) generators and solar; however, the applicant has plans to fully convert to solar power by the end of 2023. The project would

continue to utilize a generator for emergency purposes which is not uncommon for agricultural operations in rural areas. Less than significant impact.

Hazards and Hazardous Materials: The project will store fertilizers, herbicides, and fuel in existing storage structures. All hazardous materials are stored in a locked area with secondary containment in accordance with applicable regulations. The project does not expose the public to hazards. The project is in a rural area rated as a very high fire risk area; however, no significant wood framed structures will be constructed as part of this project. Additionally, conditions require fire-resistant materials be utilized for construction of the generator containment structures. The project would not impair emergency response or create a significant risk from wildfire. Less than significant impact.

Hydrology and Water Quality: The project is for 28,625 square feet of mixed light and outdoor cannabis cultivation with ancillary propagation and processing activities. The project will not degrade any water sources or contribute to sedimentation, as irrigation runoff, erosion control, and watershed protection measures are implemented by the project, as described in the Cultivation and Operations Plan. Less than significant impact.

Land Use and Planning: The project proposes an agricultural activity on a parcel zoned as Timberland Production Zone (TPZ), in which all general agricultural uses are principally permitted. The project will not physically divide an established community or result in a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. No impact.

Mineral Resources: No mining is proposed. The project will not 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. The project will not result in the loss of availability of a locally important mineral resource recover site. No impact.

Noise: The project is in a rural portion of the County on a site with historic logging activities, surrounded by forested land. The project will not result in the generation of excessive groundborne vibration or noise levels. Noise sources from the operation will include those of typical agricultural operations, and the use of generators; however, the applicant has plans to fully convert to solar by the end of 2023. The project would continue to utilize a generator for emergency purposes which is not uncommon for agricultural operations in rural areas. Less than significant impact.

Population and Housing: The project is for mixed light and outdoor cannabis cultivation, with ancillary propagation and processing activities. Up to fifteen (15) employees may be onsite during peak operations, and employee housing is proposed onsite. No removal of any housing is proposed. The project will not induce substantial unplanned population growth in an area nor displace substantial numbers of existing people or housing necessitating the construction of replacement housing. No impact.

Public Services: The project is for 28,625 square feet of cannabis cultivation with ancillary propagation and processing activities on a site where historic logging activities have occurred and where agricultural activities are principally permitted. The project will not increase the need for fire or law enforcement services. The project is not within 600 feet of a school or park. Less than significant impact.

Recreation: The project site is private property and contains no recreational facilities nor are recreational facilities accessed through the property. No impact.

Transportation: Up to fifteen (15) employees may be onsite during peak operations. Access to the site is via a driveway off Little Larabee Creek Road (which traverses the subject property) to State Highway 36. Little Larabee Creek Road is privately maintained, while State Highway 36 is maintained by the California Department of Transportation (Caltrans). A Road Evaluation Report prepared for an unnamed accessed road (assumed to be Little Larabee Creek Road) indicates that the roadway does meet a Category 4 road equivalent standard but could accommodate the cumulative increased traffic from the project and all known cannabis projects if the recommendations in the supplemental report are implemented. The project site will also have adequate emergency access. Conditions of approval require the applicant to implement the recommendations contained in the Road Evaluation Report, improve the access road (Little Larabee Creek Road) to commercial driveway standards, maintain driveways and private road intersections onto the County road in accordance with County Code Section 341-1 (Sight Visibility Ordinance), take steps to form a Road Maintenance Association for the maintenance of Little Larabee Creek Road, and shall pay fair-share cost for maintenance of the road. Less than significant impact.

Tribal Cultural Resources: No known cultural resources are located within the project area. The lead agency consulted with local tribes through the project referral process. The project will adhere to the Inadvertent Discovery Protocol in the event of inadvertent discovery of resources, as recommended by the Bear River Band of the Rohnerville Rancheria in April 2018. Less than significant impact.

Utilities and Service Systems: Green waste material is composted onsite within a small area equipped with perimeter and top containment. Other materials, unsuitable for composting, are stored in conventional lid trash containers along with domestic waste and hauled to an approved transfer station/disposal facility, as needed, as described in the Cultivation and Operations Plan. The project will provide portable toilets and handwashing stations for cultivation staff until permanent ADA accessible facilities are developed. Water for propagation and cultivation is sourced from an onsite rainwater catchment pond and associated storage tanks. Less than significant impact.

Wildfire: The project will not interfere with any evacuation plan. The project will not develop any significant new structures that will increase the risk of wildfire. Less than significant impact.

No changes are proposed for the original MND recommended mitigations. The proposal to authorize the continued operation of an existing cannabis cultivation site consisting of 28,625 square feet of cultivation with ancillary propagation, drying, and processing activities is fully consistent with the impacts identified and adequately mitigated in the original MND. The project as conditioned to implement responsible agency recommendations, results in no significantly adverse environmental effects beyond those identified in the MND. Compliance with the CMMLUO ensures consistency with the adopted MND and provides for mitigation of all project related impacts to a less than significant level.

In reviewing the application for consistency with the adopted MND, the County considered the following information and studies, among other documents (see Attachment 4 for a complete listing of documents):

- Site Plan prepared by the applicant, received 10/25/22.
- Cultivation and Operations Plan prepared by Fellow Farmers Environmental, received 5/3/22, with additional information provided by the applicant via email correspondence, dated 10/17/22 and 10/18/22.
- Right to Divert and Use Water issued by the State Water Resources Control Board (Registration No. H500790, Certificate No. H100216), dated 7/16/18.
- Water Resource Protection Plan (WDID 1B1706161CHUM) prepared by Natural Resources Management Corporation, dated 10/4/17, for the North Coast Regional Water Quality Control Order No. R1-2015-0023.
- Final Streambed Alteration Agreement issued by the California Department of Fish and Wildlife (Notification No. 1600-2017-0678-R1), dated 6/4/18.
- Notice of Applicability (WDID 1_12CC403054) issued by the North Coast Regional Water Quality Control Board, dated 9/6/19.
- Joint Timber Management Plan for Portions of APN 208-113-007 and 208-113-008 prepared by Natural Resources Management Corporation, dated 8/16/17.
- Timber Conversion Evaluation Report Inspection and Recommendations prepared by Natural Resources Management Corporation, not dated.
- A Road Evaluation Report for an approximately 4-mile segment of “unnamed road” (assumed to be Little Larabee Creek Road), from the subject property to Highway 36, with supplemental Roadway Evaluation Report, prepared by DTN Engineering and Consulting, dated 5/9/18.
- Neighborhood Traffic Management Plan prepared by the applicant, received 11/10/22.
- R2 Soils Report prepared by Trinity Valley Consulting Engineers, Inc., received 7/11/18.

- Addendum to Soils Report prepared by Trinity Valley Consulting Engineers, Inc., dated 12/20/22.
- Water Management Plan prepared by Natural Resources Management Corporation, dated 7/30/18.
- Biological Report prepared by Natural Resources Management Corporation, dated 10/23/18.
- Cannabis Cultivation Square Foot Verification for APN 208-113-008 prepared by DTN Engineering and Consulting, received 9/20/19.
- Wetland Delineation Report for APN 208-113-008 prepared by Jon Backus, West Coast Wild Ecological Restoration LLC, received 8/12/24

Other CEQA Considerations

Staff suggests no changes for the revised project.

EXPLANATION OF DECISION NOT TO PREPARE A SUPPLEMENTAL MITIGATED NEGATIVE DECLARATION OR ENVIRONMENTAL IMPACT REPORT

See Purpose statement above.

In every impact category analyzed in this review, the projected consequences of the current project proposal are either the same or less than significantly increased than the initial project for which the MND was adopted.

Project impact analysis of conformance to the Mitigated Negative Declaration Substituted Mitigation Monitoring and Reporting Program

Mitigation Measure 1: Required setback from tribal cultural resources and tribal consultation process (55.4.10(o) and 55.4.10(c)).

- The project is within the historic aboriginal territory of the Bear River Band of the Rohnerville Rancheria. The project was referred to the Northwest Information Center (NWIC) at Sonoma State and the Bear River Band of the Rohnerville Rancheria in October 2017. Although the NWIC recommended a study by a qualified professional archaeologist be conducted prior to commencement of project activities in January 2018, the Bear River Tribal Historic Preservation Officer only requested inclusion of the standard inadvertent discovery protocol language as a condition of approval in April 2018, which has been incorporated into the project as an informational note (Informational Note C.3).

Mitigation Measure 2: Curing violations of state, county code (55.4.11(a)).

- The project is for existing cultivation and project approval includes a compliance agreement to cure unresolved violations of state or county code.

Mitigation Measure 3: Required setbacks from watercourses, wetlands, and Environmentally Sensitive Habitat Areas (55.4.11(d)).

- The project is located within the inland portion of the County and is subject to the setback standards in the Streamside Management Areas and Wetlands Ordinance as well as Chapter 10 (Conservation and Open Space Elements) of the General Plan. As depicted on the Site Plan, Little Larabee Creek and an unnamed tributary of Little Larabee Creek traverse the western portion and northwesternmost corner of the subject parcel, and all cultivation areas meet or exceeds the setbacks to streamside management areas.

Mitigation Measure 4: Permitting Tiers and related requirements (55.4.8.2 et seq.)

- The project is for 28,625 square feet (SF) of existing mixed light and outdoor cannabis cultivation, including a maximum of 2,863 SF of ancillary propagation, on a site zoned as Timberland Production Zone (TPZ), which requires a Conditional Use Permit. The project complies with the requirements described in 55.4.8.2 et seq.

Mitigation Measure 5: Retirement, Remediation, and Relocation Program (55.4.14)

- The project is not participating in the Retirement, Remediation, and Relocation program; therefore, this mitigation measure does not apply.

Mitigation Measure 6: Cannabis Cultivation on Forest Lands

- This project is for existing cultivation consistent with baseline conditions which is eligible on properties zoned a Timberland Production Zone (TPZ). No new increased cultivation will occur. Based on review of historic aerial imagery dating back to 2004, evidence of historical logging activities was observed onsite in 2005, in which cleared areas within the western, southwestern, southern, central, and northeastern portions of the subject property were observed. Additionally clearing and development appears to have occurred in 2009, which appears to have been further expanded between 2009 and 2010, 2012 and 2014, 2014 and 2016, and 2016 and 2018. According to the Timber Conversion Evaluation prepared by a Registered Professional Forester (RPF) of Natural Resources Management Corporation (NRM; not dated), the property was inspected in March 2017 and a total of 2.0 acres of unauthorized timber conversion was determined to have occurred onsite. Clear-cutting occurred onsite prior to 2005 and that 70% of the conversion area occurred by 2009, with the other 30% cleared since 2014. Reviewing aerial imagery indicates that additional timberland conversion has occurred onsite after preparation of the Timber Conversion Evaluation. As such, the project is conditioned to require the property be evaluated by a RPF to determine the amount of timber conversion that occurred prior to and after the CMMLUO baseline date of January 1, 2016, and re-stock an area onsite equivalent to the amount of area converted after the CMMLUO baseline date at a 3:1 ratio.

Mitigation Measure 7: Use of fertilizer, pesticide, fungicide, rodenticide, or herbicide (55.4.11(j)).

- The project operations plan describes measures that will be taken to properly store and handle hazardous materials. Compliance with the operations plan is a condition of project

approval. The use of anticoagulant rodenticide is prohibited. The project is conditioned requiring the applicant to provide written compliance with the Certified Unified Program Agency (CUPA) requirements.

Mitigation Measure 8: Diversion of surface water and trucked water (55.4.11(l)-(m)).

- The project currently utilizes a stream diversion, two groundwater wells, and rainwater catchment for irrigation, with a 400,000-gallon rainwater catchment pond proposed. Once the catchment pond is developed it will provide the bulk of irrigation for the project, allowing the stream diversion to become secondary. A Special Permit is requested under the project for development in the Streamside Management Area (SMA) related to continued use and maintenance of the existing point of diversion.

Mitigation Measure 9: Generator Use (55.4.11(o)).

- The project currently utilizes three (3) generators and solar; however, the applicant plans to fully convert to solar by the end of 2023, with a generator for emergency backup only. The project is conditioned to require the applicant to submit an energy use plan that describes the power demand for the project that includes a description of what power is required for (e.g., propagation, cultivation, and processing) and how much power is required on a monthly and annual basis. The energy plan shall also include a description of the generator(s) used to meet the power demand and state how the size of the generator is reasonable based on the power demand. The generator(s) used to support operations shall not be larger than required to meet operational needs. The plan shall also describe how the operation will transition to use of 80% renewable energy (e.g., solar, wind, and/or hydropower) sources by the end of 2026. Additional conditions require that noise from the generator will not exceed 50 decibels at 100 feet or edge of clearing whichever is closer.

Mitigation Measure 10: Storage of Fuel (55.4.11(p)).

- The project is conditioned that fuel shall be stored and handled in compliance with applicable state and local laws and regulations and in such a way that no spillage occurs.

Mitigation Measure 11: Performance Standards for Cultivation and Processing Activities (55.4.11(q)-(u)).

- Applicant has provided a statement declaring they are an agricultural employer as defined in the Alatorre-Zenovich-Dunlap-Berman Agricultural Labor Relations Act of 1975 (Part 3.5 commencing with Section 1140) of Division 2 of the Labor Code).
- The project includes onsite ancillary processing activities, and the operations plan describes operational practices and employee safety standards.

Mitigation Measure 12: Performance Standards for Mixed Light Cultivation (55.4.11).

- The project includes up to 11,500 SF of mixed light cultivation and ancillary propagation, both of which utilize artificial lighting. Conditions of approval require the applicant to implement light attenuation measures. Such measures include required compliance with International Dark Sky Association Standards Lighting Zone 0 and Lighting Zone 1, and

requiring the project be designed to regulate light spillage onto neighboring properties resulting from backlight, up light, or glare (BUG). No use of artificial lighting is authorized by this permit until the applicant can demonstrate compliance with these standards.

Mitigation Measure 13: Humboldt Artisanal Branding Provision (55.4.15).

- The proposed project is for more than 3,000 square feet; therefore, this measure does not apply.

Mitigation Measure 14: Sunset Clause for applications

- The application was received on December 2, 2016, prior to the sunset of the ordinance.

Based upon this review, the following findings are supported:

FINDINGS

1. The proposed project will permit an existing cannabis operation and bring the operation into compliance with county and state requirements intended to adequately mitigate environmental impacts.
2. The circumstances under which the project was approved have not changed substantially. There are no new significant environmental effects and no substantial increases in the severity of previously identified effects.
3. For the current proposed project, there has been no 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 MND was adopted as complete.

CONCLUSION

Based on these findings it is concluded that an Addendum to the certified MND is appropriate to address the requirements under CEQA for the current project proposal. All of the findings, mitigation requirements, and mitigation and monitoring program of the MND, remain in full force and effect on the original project.