

**DRAFT ADDENDUM TO THE ENVIRONMENTAL IMPACT REPORT**

**MODIFICATION TO THE CONDITIONAL USE PERMIT TO ALLOW FOR:**

- 1. SUBSTITUTION AND RECONFIGURATION OF OFF-SITE PARKING AREAS,**
- 2. INCLUSION OF CENTER BEACH LATE NIGHT MUSIC AREA**
- 3. INCLUSION OF NEW CANNABIS VILLAGE AREA FEATURING  
CONCESSIONS AND CONSUMPTION OF CANNABIS**

**SCH NO. 2012082108**

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## Background

**Modified Project Description and Project History** – Modification to the approved Conditional Use Permit for the Reggae on the River music festival to authorize the following proposed changes to the operation and design of the festival:

1. Parking of up to 2,500 vehicles at the County Line Ranch (formerly Dimmick), instead of using previously authorized off-site parking areas at Benbow and Richardson Grove RV Park and Campground. Off-site parking capacity at these two campgrounds totaled approximately 309 spaces.
2. Erection of a stage and Late-Night Music Area at Center Beach operating from midnight to 4am during each night of the festival
3. Establishment and operation of a cannabis vending and consumption area (Cannabis Village), pursuant to section 314-55.4.10.4 of Humboldt County Code, which authorizes Temporary Special Events of this sort. Where locally authorized, Temporary Special Events featuring cannabis-related concessions and consumption within discrete areas (premises) are subject to licensing through the California Bureau of Cannabis Control (BCC). Pursuant to Humboldt County Code and section 26200(e) of the California Business and Professions Code, access to the cannabis event premises may only be granted to persons 21 years of age or older, and sales and consumption of Alcohol or Tobacco is prohibited within the concessions & consumption area.

This addendum to the original EIR (SCH 92-033035) and Supplemental EIR (SCH #2012082108) addresses the potential effects of the changes to the event that are currently proposed.

## Purpose

The purpose of this Addendum is to provide an analysis of the proposed modification to the approved Conditional Use Permit as it was not discussed under its previously adopted EIR or subsequent Addendums that have been prepared for earlier changes to the approved event. Section 15164 of the California Environmental Quality Act (CEQA) provides that the lead agency may prepare an addendum to a previously adopted Environmental Impact Report (EIR) if some changes or additions are necessary but none of the conditions described in Section 15162 calling for a subsequent EIR have occurred.

Section 15162 states that when an EIR has been 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 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 EIR 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 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, shows any of the following: A) the project will have one or more significant effects not discussed in the previous EIR; B) significant effect 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.*

In response to the above criteria, the analysis presented later in this attachment shows all of the following:

- No substantial changes are proposed which would require major revisions to the previously approved EIR. None of the proposed changes to the project will increase the severity of previously identified significant effects. In fact, impacts from the project appear to have been lessened due to the reduced scope of the project to solely including overflow parking in Humboldt County.
- No substantial changes to the project will result in a new environmental effect. Any potential impacts of significance have been mitigated through the project design currently proposed.
- All feasible mitigation measures have been incorporated into the project design *and Conditions of Approval*. No additional mitigation is required. Since the project has been modified to effectively mitigate for all identified potential impacts, an addendum remains appropriate.

#### **Summary of Significant Project Effects and Mitigation Recommended**

The change in the scope of the project does not generate any significant effects that require additional mitigation. The same measures required to mitigate the impacts of the original project will also be applied to the future project as well.

#### **Other CEQA Considerations**

With the exception of applying the same mitigation measures to the future project, staff suggests no changes to the project as currently proposed.

#### **EXPLANATION OF DECISION NOT TO PREPARE A SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT DECLARATION**

The proposed modification to the approved Conditional Use Permit will allow:

1. substitution and reconfiguration of off-site parking areas utilized for festival attendees
2. inclusion of new cannabis village area featuring concessions and consumption of cannabis
3. operation of a center beach late night music area

The proposed project will contain either the same or reduced potential impacts and will include mitigation measures found in the originally approved project under CUP-12-017 (SCH 2012082108) based on the analysis below. The proposed modification requires preparation of an addendum to the EIR to explain why it is an appropriate environmental document rather than a Supplemental Environmental Impact Report.

**1. AESTHETICS.** Except as provided in Public Resources Code Section 21099, would the project:

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| a) Have a substantial adverse effect on a scenic vista?   |
| b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?  |
| c) In non-urbanized areas, Substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality? |
| d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?  |

The project will not have a substantial adverse effect on a scenic vista. The same sites are being used that were evaluated in the EIR and the 2014 Addendum to allow the use of three off-site parking areas.

There is no potential the project will substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway. The project will not result in the construction or demolition of any new permanent structures so it does not have any potential impacts which would substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway corridor.

The project will not substantially degrade the existing visual character or quality of the site and its surroundings. No permanent structures are being proposed which would impair the existing visual character of the sites. After the event is over, all temporary facilities within the venue and the surrounding areas will be removed and the sites will be cleaned up.

The surrounding property along Highway 101 is characterized as Highway Commercial Service, so there is already considerable nighttime lighting in the area. The lights for traffic areas and parking will be as prominent as the lighting that occurred in previous years for the event at the same site. The measures proposed by the applicant in the 2019 Plan of Operation (Attachment 3B) will be incorporated into the approved Conditional Use Permit as a standard condition of approval.

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| <b>2. AGRICULTURE AND FORESTRY RESOURCES.</b> In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project: |
| a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?  |
| b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?  |
| c) Conflict with existing zoning for, or cause rezoning of, forest and (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?   |

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| d) Result in the loss of forest land or conservation of forest land to non-forest use?   |
| e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use? |

The project will not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring program of the California Resources Agency, to non-agricultural use. No permanent structures are being proposed.

No trees will be removed for the event and no permanent structures will be constructed. The grass-covered areas of the site will be mowed and baled to reduce fire hazard.

The project will not result in the loss of forestland or conversion of forestland to non-forest use nor impair their forest productivity because the use is temporary, occurring for a one-week period during the year.

The project will not involve other changes in the existing environment, which, due to their location or nature, could result in conversion of farmland to non-agricultural use or conversion of forestland to non-forest use. The proposed new sites are not within a Williamson Act preserve.

The above paragraphs describe how the proposed use will not result in any impacts on the agricultural value of the property. These same measures will protect the existing trees on the property as well, which is sparsely populated with oak, Douglas fir and Redwood trees.

The General Plan Land Use designation is RA, T and CR, and it is Zoned Unclassified. Presently, the agricultural use of the sites is limited because of the small parcel size and the existing commercial recreational use. There is also an extensive 100-year floodplain that has limited agricultural potential due to the presence of exposed gravel bars and river-deposited terraces.

**3. AIR QUALITY.** Where available, the significant criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

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| a) Conflict with or obstruct implementation of the applicable air quality plan?   |
| b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard? |
| c) Expose sensitive receptors to substantial pollutant concentrations?  |
| d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people)?   |

According to the PM<sub>10</sub> Attainment Plan adopted by NCUAQMD (May 11, 1995), Humboldt County's air quality has violated the California PM<sub>10</sub> ambient standard. As a result, the district has been classified as a PM<sub>10</sub> non-attainment area.

The PM<sub>10</sub> Attainment Plan includes control strategies that are intended to achieve the attainment goals that are identified in the Plan. Control strategies include transportation control measures such as encouraging the use of public transit and replacing the diesel-powered bus fleet with natural gas fueled models, encouraging car-pooling and bicycle commuting, removal or repair of vehicles with inefficient emission control systems, and traffic flow improvements that reduce idling and vehicle miles traveled (VMT). Land use control measures encourage mixed use or more

dense development. The PM<sub>10</sub> Attainment Plan also includes open burning measures that limit residential burning as well as various measures to encourage the installation of EPA certified woodstoves.

The North Coast Unified Air Quality Management District did not respond to the Notice of Preparation for the project circulated on August 23, 2012. The project description includes measures that are consistent with the PM<sub>10</sub> Attainment Plan. Camping is allowed on site, which will reduce vehicle usage during the event. Shuttle buses will provide public transit between the event site and the off-site parking areas and Garberville. Dust will be minimized by watering the roads with a dust suppressant and watering grassy areas of the site to encourage growth of new grass after mowing. Fires are not permitted on the site. The actions listed above support the proposed mitigation measures and will be sufficient to comply with the applicable air quality plan, minimizing the potential violation of air quality standards.

There is no evidence the event will expose sensitive receptors to substantial pollutant concentrations. There are no hospitals or retirement homes within six (6) miles of the site that include a substantial number of sensitive receptors.

The proposed modifications to the event will not create objectionable odors affecting a substantial number of people. Trash will be removed from the site and will be taken off-site for disposal as soon as practical after the event.

The proposed cannabis concessions and consumption area will not generate any air quality impacts that were not previously considered in the EIR. An Outdoor Festival, smoking has been customary at the event since its inception. Providing a designated area for cannabis consumption will help isolate these activities from non-smoking attendees and control their potential for nuisance.

The primary source of the project's GHG emissions and energy use is anticipated to be the combustion of fossil fuels from motor vehicles. The project's incremental increases in GHG emissions associated with temporary increases in traffic will contribute to regional and global increases in GHG emissions and associated climate change effects. For those persons parking off-site, the project includes shuttle services to and from those off-site destinations, which will also minimize the use of cars. Review of the State goals for reducing GHG emissions indicate that the project would not conflict with the goals identified in AB 32 (the California Global Warming Solutions Act of 2006).

<b>4. BIOLOGICAL RESOURCES.</b> Would the project:
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

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| e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?  |
| f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? |

The project will not interfere with migratory movement or impede the use of nursery sites for salmon. The salmonid young of the year will have migrated downstream by the time the event occurs. Native fish species seek refuge in deep pools and at the inlets of creeks and springs. These favorable conditions do not occur in the reach of the river where the project is located based on in-stream temperature conditions measured in 2012.

The proposed permit modifications (1. Off-site event parking at County Line Ranch, 2. Erection of a Stage and Operation of a Late-Night Music Area, and 3. Establishment of a Cannabis Vending & Consumption Area) are not likely to disturb Spotted Owls or Marbled Murrelets because the project occurs during the time of year there is no nesting activity for these species. The temporary event does not interfere with the movement of resident or migratory fish or animals because no permanent structures are left on the site after the event.

The proposed project will not conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance. The proposed project will increase the use of the Streamside Management Area compared to previous events.

No habitat conservation plan applies to the site or the surrounding area. Accordingly, the project does not conflict with any local policies or ordinances protecting biological resources.

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| <b>5. CULTURAL RESOURCES.</b> Would the project:  |
| a) Cause a substantial adverse change in the significance of a historical resource pursuant to in §15064.5?   |
| b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5? |
| c) Disturb any human remains, including those interred outside of formal cemeteries?                          |

The proposed permit modifications will not involve disturbance to any new areas. No new grading is proposed except for grading to construct ramps to the trash and recyclable dumpsters. There are no mapped cultural, historical or paleontological resources or geologic features or human remains on the property.

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| <b>6. ENERGY.</b> Would the project:  |
| a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? |
| b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?   |

The proposed permit modifications (1. Off-site event parking at County Line Ranch, 2. Erection of a Stage and Operation of a Late-Night Music Area, and 3. Establishment of a Cannabis Vending & Consumption Area) will not result in wasteful, inefficient, or unnecessary consumption of energy resources, during project operation.

Locating and consolidating off-site parking areas closer to the event helps reduce energy use by reducing the length and need for shuttle service. Traditionally, a large percentage of festival attendees choose to camp within the one of the on-site camping areas, where after-hours parties with self-amplified music are quite common. Operation of the proposed Late-Night Music Area provides a similar function, allowing festival attendees a place to decompress after headline performances on the main-stage have completed while concentrating associated noise towards interior portions of the festival, thereby minimizing disturbance to neighboring property owners and other attendees.

All other festival-related energy use is customary to the event is not expected to exceed baseline levels found during prior years. Therefore, conflicts with or obstruction of a state or local plan for renewable energy or energy efficiency is not expected to result.

<b>7. GEOLOGY AND SOILS. Would the project:</b>
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42?
ii) Strong seismic ground shaking?
iii) Seismic-related ground failure, including liquefaction?
iv) Landslides?
b) Result in substantial soil erosion or the loss of topsoil?
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

The proposed project does not expose people or structures to potential adverse effects, including the risk of loss, injury, or death.

According to the Geologic Hazards maps of the General Plan, the project is mostly located in an area of low instability. There are steep hillsides on the properties, but the proposed uses will occur on the relatively flat areas of the properties. Additionally, the project site is not located in a special studies zone or mapped in a potentially active fault zone according to the Special Study Maps prepared by the State of California. Accordingly, the project will not expose people or structures to substantial adverse effects from a fault rupture.

The project will not expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving strong seismic ground shaking. According to the Geologic Stability Rating Map, the soils on the project site are classified as relatively stable. The project site is located in Seismic Zone 4, with a seismic Zone factor of 0.4, per Figure 16-2 and Table 16-1 of the 1998 Uniform Building Code (UBC). However, no new construction is proposed.

The project will not expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving seismic-related ground failure and liquefaction. The soils at the site are not in an area mapped as conducive to liquefaction and subsidence on the Geologic Stability Rating Map. In addition, these maps show the site is not located in an area identified with the potential for liquefaction.

The project will not expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving landslides. The relatively stable soils and gentle topography minimize the risk of landslides as a result of the project.

The project will not result in soil erosion or loss of topsoil. The proposed parking will be on parts of the site with mild slope, which has little potential for erosion. Existing access roads will be used to access the parking areas.

The project is not located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project. The project is primarily confined to relatively level terrain associated with the riverbar and nearby terraces of the Eel River's South Fork.

The project will not be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property. There are no known expansive soils in the area and no permanent structures are proposed.

No event-related sewage will be disposed of in on-site systems. Portable toilets are utilized by event attendees. An on-site greywater system handles event-related wastewater from other sources.

There are no known unique geologic or paleontological features within the footprint of the festival.

<b>8. GREENHOUSE GAS EMISSIONS.</b> Would the project:
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

The primary source of the project's GHG emissions and energy use is anticipated to be the combustion of fossil fuels from motor vehicles. The project's incremental increases in GHG emissions associated with temporary increases in traffic will contribute to regional and global increases in GHG emissions and associated climate change effects. For those persons parking off-site, the project includes shuttle services to and from those off-site destinations, which will also minimize the use of cars. Locating and consolidating off-site parking areas closer to the event helps reduce energy use by reducing the length and need for shuttle service.

Traditionally, a large percentage of festival attendees choose to camp within the one of the on-site camping areas, where after-hours parties with self-amplified music are quite common. Operation of the proposed Late-Night Music Area provides a similar function, allowing festival

attendees a place to decompress after headline performances on the main-stage have completed while concentrating associated noise towards interior portions of the festival, thereby minimizing disturbance to neighboring property owners and other attendees. All other festival-related emissions are customary to the event and not expected to exceed baseline levels found during prior years. Review of the State goals for reducing GHG emissions indicate that the project (as modified) would not conflict with the goals identified in AB 32 (the California Global Warming Solutions Act of 2006), adopted to reduce GHG emissions is not expected.

<b>9. HAZARDS AND HAZARDOUS MATERIALS. Would the project:</b>
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

The proposed modifications to the event will not create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials. The proposed project does not involve transport, use or the disposal of hazardous materials.

The proposed modifications to the event will not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. As proposed, the event does not involve the transport, use, or the disposal of hazardous materials (solvent, oils, fuels, etc.).

The proposed modifications to the event will not involve hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. The proposed parking does not involve activities that would result in hazardous emissions or the handling of hazardous materials, nor is it located within one-quarter mile of an existing or proposed school.

The proposed event modifications are not located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, it would not create a significant hazard to the public or the environment. The event site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. The California Envirostor database was queried for hazardous materials sites pursuant to Government Code Section 65962.5. No site is located within the vicinity.

The event site is located approximately three miles from the nearest public airport and is not in an approach or transition zone nor is it designated as an area that has a limited risk. Accordingly, the project will not result in a safety hazard for people residing or working in the project area.

The proposed event site is not within the vicinity of a private airstrip. The proposed event site is more than three (3) miles from a public airstrip so the modification will not result in a safety hazard for people residing or working in the project area.

The 2019 Plan of Operation in Attachment 3 describes the fire protection measures proposed by the applicant and are required to be implemented by conditions of approval. As in previous years, the fire suppression resources at the site will provide the necessary fire protection in the local area during the event.

The Critical Incident Team will coordinate implementation of the emergency response plan. The Operations Plan for the event addresses emergency response to wildfire and other disasters and evacuation of attendees from the proposed new parking areas. Conditions of approval require conformance with the approved Operations Plan.

<b>10. HYDROLOGY AND WATER QUALITY. Would the project:</b>
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:
i) result in substantial erosion or siltation on- or off-site;
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or
iv) impede or redirect flood flows?
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

The project will not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table. There will be no drafting of water after May 15. Water for dust control will be from on-site storage of rainwater.

The project will not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site. Minimal new grading is proposed. Use of the site will also not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site.

The proposed modifications to the event will not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial

additional sources of polluted runoff. The event occurs during the dry time of the year when rain is highly unlikely to fall. No permanent structures or grading activities are proposed. Natural drainage patterns of the site will not be altered. Roads and parking lots will not be graded except as necessary to allow the passage of vehicles.

The project will not place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other hazard delineation map. No permanent structures are proposed.

The proposed modification will not place within a 100-year flood hazard area structures that would impede or redirect flood flows. No new structures are proposed in the new parking areas

The proposed modifications to the event will not result in the exposure of people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam. The event occurs during the dry time of the year when rain is highly unlikely to fall, and there are no dams located along the South Fork of the Eel River, upstream of the event site.

The proposed modifications to the event will not result in the exposure of additional people or structures to a significant risk of loss, injury or death in the event of a seiche, tsunami, or mudflow. There is no hazard in the project area or from the project itself from flooding, including flooding as a result of the failure of a levee or dam, or by seiche, mudflow or tsunami.

Conditions of approval require the same measures be applied to the future events. Vehicles will be screened and inspected as they enter the parking areas. Those with obvious leaks of oils or antifreeze will be directed to parking lots in upland areas away from the gravel bar. Oil-absorbing pads will be placed strategically under the vehicle to catch the drips. After the vehicles depart, the pads and any contaminated soil substrate will be collected and disposed of. Representatives from CDFW inspected the gravel bars of the event site after the 2013 event and found no contamination of the gravel bar from leaking car fluids.

**11. LAND USE AND PLANNING.** Would the project:

- a) Physically divide an established community?
- b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

The proposed modifications to the event will not physically divide an established community. The proposed project will not result in the construction of any permanent structures or features.

The proposed modifications will not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect. The proposed project is conditionally allowed by the zoning ordinance and land use plan.

The proposed event modifications will not conflict with any applicable habitat conservation plan or natural community conservation plan. The proposed parking areas will not occur within the Streamside Management Area, which is 100' from the top of the bank. The purpose of the SMA is to prevent environmental impacts to watercourses.

**12. MINERAL RESOURCES.** Would the project:

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| a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?                                |
| b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? |

The proposed event modifications 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 proposed new parking areas will not involve placement of permanent structures.

Additionally, the proposed changes will not result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan. The proposed project is a temporary and short-duration event. It could temporarily interfere with potential gravel mining operations on the adjacent property to the south. No gravel mining will occur during the event. The project will not result in the permanent loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.

**13. NOISE.** Would the project result in:

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| a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?   |
| b) Generation of excessive groundborne vibration or groundborne noise levels?   |
| c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? |

The primary source of noise at the event comes from the daily series of amplified musical performances which occur at the main concert stage. The stage location and position is fixed, facing northeast. The size and location of the stage and audience are the primary factors affecting what amplification level is optimal. Since the stage location is fixed and event attendance is capped and has remained fairly stable, it is reasonable to conclude that event noise levels (from amplified music at the main stage) remain fairly consistent from year to year.

Over the years, private late-night parties (after midnight, when performances on the main stage ended) held by event attendees were not uncommon and occurred (primarily within on-site camping areas) throughout the festival, and often involved dancing and amplified music. During the 2018 event the promoter chose to create a dedicated after-hours party area at South Beach, to provide a more effective venue for these customary activities. During the Community meeting in February, a resident of a neighboring property upriver from the event site complained that the noise from (amplified music at) the South Beach after-hours party was bothersome, and on some nights continued until nearly 6am.

The applicant has relocated the late-night stage to a more northern portion of the festival site and is proposing to restrict hours to between midnight and 4am. To help insure the dance party does not create a nuisance to neighboring landowners and residents, the permit includes a condition of approval requiring that the applicant implement a series of measures designed to facilitate adaptive management of the event. This will occur primarily through collection of feedback from local residents (immediately prior to and) during the event, and implementation of adaptive measures to help reduce, minimize, or resolve the issue(s) identified. The Condition also requires

that noise levels be measured from the northern, southern, eastern, and western boundaries of the property during operation of the late-night stage. The provisions of this Condition are similar to operational measures implemented during earlier years of the festival (immediately following approval of the Use Permit and certification of the most recent EIR) which required measuring sound levels and providing a hotline for local residents to call with concerns.

The proposed use is for a temporary event. It will not result in any permanent increases in ambient noise. These mitigations are similar to ones previously analyzed in the EIR, and will insure the temporary increase in ambient noise levels in the project vicinity would not result in a potential nuisance to surrounding land uses.

The proposed modifications to the event will not expose people to noise impacts from airports. The festival site is located more than three (3) miles from the nearest airport.

Traffic noise impacts for the residents of the area will be similar to previous years as there will be the same number of vehicles traveling to and from the event. Allowing people to enter the site early will reduce the number of vehicles arriving at any one time.

**14: POPULATION AND HOUSING.** Would the project:

- a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?
- b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

The proposed event modifications will not induce substantial population growth in an area, either directly or indirectly. The proposed project is temporary. It will only induce a temporary and transitory population increase in the immediate vicinity during the event.

The proposed modifications will not displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere. The proposed project does not include the displacement of any existing housing. No permanent structures are proposed.

Additionally, the proposed changes to the project will not displace substantial numbers of people, necessitating the construction of replacement housing elsewhere. The proposed project will not displace any people because no permanent structures are proposed that could displace people.

**15. PUBLIC SERVICES.**

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

i. Fire protection?

ii. Police protection?

iii. Schools?

iv. Parks?

v. Other public facilities?

The proposed modifications to the event will not result in substantial adverse physical impacts associated with the provision of new or physically altered facilities for fire protection or police protection. The proposed project will cause a temporary increase in the need for fire and police protection at the site, which is addressed by the security and emergency response plan.

The proposed changes will also not result in substantial adverse physical impacts associated with the provision of new or physically altered facilities for school, park or other public facilities. There are no permanent structures proposed that would require new school, park or other public facilities.

**16. RECREATION.**

- a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?
- b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

The proposed project will not result in an increase in the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. The concert site is not a public park.

The proposed modifications to the event will not include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment. The proposed modification does not include construction of new, or the expansion of, existing recreational facilities.

**17. TRANSPORTATION.** Would the project:

- a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?
- b) Would the project conflict or be inconsistent with \* CEQA Guidelines section 15064.3, subdivision (b)?  
*\* Criteria for Analyzing Transportation Impacts, effective July 1, 2020*
- c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?
- d) Result in inadequate emergency access?

The proposed modifications to the event will not cause the project to conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts and bicycle racks). There will be a minor and temporary increase in traffic during the event, but not at a level that conflict with adopted policies and plans for alternative transportation. The festival provides for extensive use of buses to shuttle people to and from off-site parking areas.

On-site and off-site traffic and parking plans have been developed by the applicant after consultation with Caltrans and the California Highway Patrol (CHP). Major concerns that are addressed include alleviating traffic congestion on Highway 101 at the main entrance to the site and pedestrian safety. Pedestrians will be allowed to cross Highway 101 at the Patriot Gas Station to safely travel between the off-site parking areas and the event. Shuttles will also be used to transport people to the event from off-site locations.

The provisions of section 15064.3, subdivision (b) of the CEQA Guidelines (Criteria for Analyzing Transportation Impacts) are not effective July 1, 2020. Nevertheless, since no increase in festival attendance is proposed, transportation impacts are not expected to exceed baseline levels established during prior years, and further analysis is therefore unwarranted. Except for the changes to the off-site parking facilities, the proposed modifications to the event will not affect transportation in a way that would result in impacts not previously analyzed or addressed. The proposed changes to the off-site parking facilities (use of County Line Ranch for parking of up to 2,500 vehicles) will help consolidate event-related parking within closer proximity to the festival.

The proposed changes to the event permit would not substantially increase hazards due to a geometric design feature or incompatible uses. Circulation patterns at the event site will remain consistent with traffic management plans that have already been approved and occurred during prior years.

The Site Plan and Parking Plan show areas where emergency access will be provided throughout the event site. They also show emergency access from the east side of the river to the north, which can be used to evacuate attendees in the event the bridge is incapacitated or incapable of providing sufficient emergency access. The Parking Plan and Plan of Operations describe the capacity of the on-site parking areas. Assuming an average of 3 persons per vehicle, on-site parking has the capacity to accommodate 7,000 persons. The remainder are expected to arrive by shuttle bus or walk up or down the river from campgrounds on adjacent properties. The proposed event modification to allow substitution of the County Line Ranch property for use as an off-site parking area, in lieu of reserving parking at the Richardson Grove RV Park and Benbow campgrounds, results in a net increase of 2,139 reserved spaces. An additional benefit of increasing use of County Line Ranch for off-site parking is the close proximity of the parking area to the festival site, which enables attendees to walk between the parking area and the festival / camping areas, reducing the need for shuttle service and vehicle miles traveled.

**18. TRIBAL CULTURAL RESOURCES:** Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resource Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resource Code section 5020.1 (k), or
- b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Provisions found in Appendix G of the CEQA Guidelines concerning Tribal Cultural Resources did not exist in 2012 when the EIR for the project was initially prepared and certified. Nevertheless, since no change in the footprint of the festival is proposed, potential for impacts to tribal cultural resources are not expected to exceed baseline levels established during prior years, and further

analysis is therefore unwarranted. The proposed modifications to the event will not result in new impacts to resources not previously analyzed or addressed.

There are no known Tribal Cultural Resources that are listed or eligible for listing on the California Register of Historical Resources, or in a local register. The proposed modifications to the project do not involve expansion of the festival footprint nor do they increase the amount of ground disturbance expected to occur. The auxiliary parking area at the County Line Ranch has been used periodically throughout the years for parking associated with the Reggae on the River Festival during earlier configurations of the event. The parking area continues to be used annually during the Northern Night Music Festival (formerly Reggae Rising), which occurs on the County Line Ranch (formerly Dimmick) and is authorized under a separate Use Permit (CUP-04-38) and EIR (SCH 92-033305).

No resource(s) significant to a Native American Tribe pursuant to 5024.1(c) are known to exist within the footprint of the project that could be adversely affected as a result of the changes to the event. Given the minor nature of the proposed modifications and long history of use at the French's Camp property, the Tribal Historic Preservation Officer for the Bear River Band of the Rohnerville Rancheria did not believe that consultation was necessary.

**19. UTILITIES AND SERVICE SYSTEMS.** Would the project:

- a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?
- b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?
- c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?
- d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?
- e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

The proposed modifications to the event will not require, or result in, the construction of new water or wastewater treatment facilities or the expansion of existing facilities. Nor will they require, or result in, the construction of new storm water drainage. Nor will the project result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments. Use of the property for the event is temporary in nature, occurring during one week of the year.

The proposed changes to the project will not require the construction of any stormwater facilities. No new permanent structures are proposed that would affect the quantity of stormwater on the site.

No impact on water supplies is expected to result from the proposed changes to the event. The Plan of Operation describes the water storage on-site, which is capable of providing all the water needed for the use.

The proposed modifications to the project will not result in related effluent exceeding wastewater treatment requirements of the applicable Regional Water Quality Control Board. No new sewage disposal facilities are needed for the proposed project modifications.

As modified, the proposed project will continue to be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs and comply with federal, state, and local statutes and regulations related to solid waste. Solid waste will be transported by a licensed hauler to a permitted landfill with adequate capacity.

**20. WILDFIRE.** If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

- a) Substantially impair an adopted emergency response plan or emergency evacuation plan?
- b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?
- c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?
- d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Provisions found in Appendix G of the CEQA Guidelines concerning Wildfire did not exist in 2012 when the EIR for the project was initially prepared and certified. The project site is located within a State Responsibility Area for Fire Protection. Fire Hazard Severity mapping show portions of the festival footprint located within areas of moderate, high, and very high fire hazard. Project-related Wildfire risk is not expected to differ as a result of the currently proposed modifications to the event. Since no change in the footprint of the festival or general range of activities is proposed, project related impacts should not exceed baseline levels established during prior years.

There is no evidence that the proposed modifications to the event would substantially impair an adopted emergency response or evacuation plan. The festival's Emergency Response Plan requires that all emergency response actions be planned and implemented by a core group known as the Critical Incident Team (CIT). The Team consists of top coordinators from the medical, fire, security, and communication crews, along with festival management and legal representation. The Team meets and plans responses to hypothetical situations in advance of the event as well as meeting daily during the event to address any current or potential areas of concern affecting the safety of event attendees. They team works under the Incident Command System (ICS), the same as most California emergency responders, and has a history of working well in cooperation with CalTrans, CHP, Cal-FIRE, and the Humboldt County Sheriff's Department. Security guards, festival staff, and volunteers also serve as emergency responders.

There is no evidence that, as proposed, the festival would exacerbate wildfire risk and expose attendees to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. The 2019 Plan of Operation in Attachment 3 describes the fire protection measures proposed by the applicant, which are consistent with those successfully implemented during past years. Prior conditions of project approval remain applicable and require that these measures be implemented annually. These include: no barbeques, fireworks, or open campfires are allowed anywhere at the Site. Camp stoves are allowed when accompanied by a fire extinguisher. Grass-covered areas of the festival site are mowed and baled ahead of the event to reduce fire hazard. An Outdoor festival, smoking has been customary at the event since its inception. Providing a designated area for cannabis consumption will help isolate and contain these flammable activities within an area interior to the festival, where potential wildfire risk is moderate and can be more easily controlled. This will result in a reduction in wildfire risk the environmental baseline formed during prior years of festival operation.

Fire suppression resources at the site will provide the necessary fire protection in the local area during the event. As in previous years, the event enjoys cooperative and coordinated fire protection from an assortment of local and state agencies and resources, including California State Parks, the Briceland Volunteer Fire Department, and Cal-FIRE and the office of the State Fire

Marshall. Fire suppression apparatus includes: 1 Type III engine and 1 Type VI engine, with required accompaniment, and pre-connections at the pumps, plus water tender. CICC certified trained crews are on site 24-hours a day before, during and after the event. Fire suppression apparatus is stationed in strategic areas for quick access to any incident. Briceland Fire or a similarly qualified outfit provide for and schedule all fire protection and rescue needs. The Garberville and Redway Volunteer Fire Department, the Piercy Volunteer Fire Department, the Leggett Fire Department, and the Whitethorn Volunteer Fire Department are also in the vicinity of the event and available to respond if required. California State Parks' North Coast Redwoods District (NCRD) allow a nearby fire lookout located in Richardson Grove State Park (RGSP) to be used by event staff and fire personnel. The lookout is equipped beforehand with shovels and water packs to facilitate rapid emergency response during the festival. Additionally, an adjacent fire access road crossing through RGSP is authorized for use as an emergency evacuation route for the event.

As outlined in the Plan of Operation, in the instance of threat from an approaching wildland fire, the Critical Incident Team would:

1. Notify offsite emergency responders
2. Secure the affected area
3. Shelter in place along the river bar – dismantle tents and campsites
4. Responding agencies (Cal-FIRE, CHP, EMS) will determine the extent of the evacuation area
5. Clear the evacuation area on foot to the predetermined evacuation zones
6. Use existing onsite resources such as the stage, onsite FM radio broadcasting capabilities, communications central, security, traffic, parking, and camping crew personnel to communicate and direct the public

The Communications/Dispatch center is in radio contact with Humboldt and Mendocino Cal-FIRE dispatch and other emergency frequencies. CIT and Fire, Medical and Security personnel also have Cal-FIRE dispatch radios. The CIT is assigned dedicated pagers and cell phones for dispatch purposes. All phone numbers and contact information is exchanged with involved State and County agencies prior to the event. A helipad is located at the north end of the Loop Lot adjacent to the emergency exit through the One Log House property.

The proposed changes to the event will not require the installation or maintenance of new roads, fuel breaks, emergency water sources, power lines or other utilities that would exacerbate fire risk or result in temporary or ongoing impacts to the environment. The festival is entering it's 35<sup>th</sup> year. While the configuration has periodically changed during this period, the footprint and essential infrastructure (stage, access roads, camping and parking areas, etc.) have remained fairly constant. As already discussed, the project plan of operation and Conditions of Approval already include a suite of measures designed to reduce or eliminate increased wildfire risk while avoiding other inadvertent impacts to the environment.

As modified and proposed, the project is not expected to expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. The majority of the festival footprint is located within the 100-year Flood zone associated with the South Fork of the Eel River. Minimal new grading occurs annually. Use of the site will also not substantially alter the existing drainage pattern of the property, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. The festival is temporary and occurs during only one week of the year. Proposed temporary site modifications do not create or contribute runoff water exceeding the capacity of existing or planned stormwater drainage systems. The event occurs during the driest time of the year when rain is highly unlikely to fall. No permanent structures or

grading activities are proposed. Natural drainage patterns of the site will not be altered. Roads and parking lots will not be graded except as necessary to allow the passage of vehicles.

**21. MANDATORY FINDINGS OF SIGNIFICANCE.**

- a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?
- b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?
- c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

The proposed continuation of the event for five years will not significantly degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory. As described in the biological resources section above, the proposed modifications to the event are not expected to have any significant impact on biological resources. The above responses also suggest the project will not have any impacts which have the potential to significantly degrade the quality of the environment. And the Cultural Resources section describes that the project will not have any potentially significant impacts on historical resources.

The proposed project also will not have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly.

The proposed modifications to the event will not result in impacts that are individually limited becoming cumulatively considerable. The EIR concluded that if a festival on the neighboring property and the Reggae on the River event occurred at the same time, the noise, traffic and hazard impacts described above would have a compounding effect, resulting in greater impacts for both events than evaluated in each individual EIR. For example, noise impacts behave exponentially such that by doubling noise levels, the impacts are more than doubled. The proposed use of the neighboring property for parking which is also the site of the Northern Nights concert event, precludes its simultaneous use as a concert event, so there is no chance of both events occurring at the same time.

In conclusion, 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 EIR was adopted. Based upon this review, the following findings are supported:

## **FINDINGS**

1. For the modified project there are no substantial changes proposed in the project which require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
2. For the modified project no substantial changes have occurred with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
3. For the modified 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 EIR was adopted as complete. Furthermore, it is concluded that the current project will not have one or more significant effects not discussed in the previous EIR. Also, significant effects previously examined will not be substantially more severe than shown in the previous EIR. There are no mitigation measures or alternatives previously found not to be feasible that would in fact be feasible and would substantially reduce one or more significant effects of the project. Finally, there are no mitigation measures or alternatives identified in this analysis which are considerably different from those analyzed in the previous EIR and which would substantially reduce one or more significant effects on the environment.

## **CONCLUSION**

Based on these findings it is concluded that an Addendum to the adopted Environmental Impact Report is appropriate to address the requirements under CEQA for the current project proposal. All of the findings and mitigation requirements of the EIR are applicable to the current project proposal.