SUNNYVALE EAST AND WEST CHANNELS FLOOD PROTECTION PROJECT

Third Addendum to the Final Environmental Impact Report

State Clearinghouse No. 2013012041

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Prepared by:

Santa Clara Valley Water District 5750 Almaden Expressway San Jose, CA 95118-3614

Valley Water Board of Directors

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A. Project Background and Purpose of Addendum

The Sunnyvale East and West Channels are artificial drainages that drain runoff in the area between Stevens Creek and Calabazas Creek in Sunnyvale. Historically, land subsidence in this area disrupted natural drainage patterns and caused localized ponding of storm and flood waters. To improve drainage and reduce flood hazards, the Santa Clara Valley Water District (Valley Water) constructed the East and West Channels between 1956 and 1979. Both channels were constructed as local storm drains, are wholly artificial, and neither channel was built at the location of a natural channel or pre-existing creek. The current channels approximately provide a 10-year level of flood protection, a typical design standard for storm drain design, and lack capacity for a 100-year flood event, thereby exposing nearby areas to flood hazards in the event of flows that exceed the level of flood protection currently provided.

To reduce flood hazards, Valley Water has developed plans to improve approximately 6.5 miles of the East Channel and approximately 3.0 miles of the West Channel, referred to as the Sunnyvale East and West Channels Flood Protection Project (Project). Improvements would increase the flow conveyance capacity of the two channels such that flows from a 100-year flood event would be accommodated without flooding adjacent areas. Valley Water prepared the Draft Environmental Impact Report¹ (EIR) for the Project in October 2013 and certified the Final EIR² on September 9, 2014. Two EIR Addenda^{3,4} have been prepared subsequent to certification of the Final EIR to disclose modifications to the Project. This Third Addendum collectively refers to the Draft and Final EIR and previous Addenda as the Project EIR.

A portion of the Project would involve the construction of a floodwall adjacent to the Donald M. Sommers Water Pollution Control Plant (WPCP) at 1444 Borregas Avenue in Sunnyvale. The WPCP is owned and operated by the City of Sunnyvale (City), which is currently preparing to construct several segments of a new perimeter security wall around the WPCP as part of its Sunnyvale WPCP Master Plan. If Valley Water's proposed floodwall adjacent to the WPCP and the City's proposed perimeter wall proceed as previously planned, there would be portions of the two walls separated by only a few feet. This would make maintenance activities between the walls, such as removal of vegetation and debris, difficult to conduct.

To avoid this complication, Valley Water and the City have collaborated to develop a plan to construct a single, dual-purpose wall (referred to as the Joint Wall) that would serve as both a perimeter security wall for the WPCP and as a floodwall for the Project, as described below.

B. Description of Project Modifications

As described in the Project EIR and shown in Draft EIR Figure 2-3a, the Project originally proposed a concrete outboard floodwall along the eastern slope of the Sunnyvale West Channel,

W:\Resource Pros\PROJECTS WATERSHED\Sunnyvale East West\Environmental\Environmental Review\CEQA\Addenda\Third Addendum

¹ Draft Environmental Impact Report. Sunnyvale East and West Channels Flood Protection Project. October 2013. Prepared by Horizon Water and Environment, LLC.

² Final Environmental Impact Report. Sunnyvale East and West Channels Flood Protection Project. State Clearinghouse No. 2013012041. August 2014. Prepared by Horizon Water and Environment, LLC.

³ First Addendum to the Final Environmental Impact Report. Sunnyvale East and West Channels Flood Protection Project. February 2022. Prepared by Valley Water.

⁴ Second Addendum to the Final Environmental Impact Report. Sunnyvale East and West Channels Flood Protection Project. April 2023. Prepared by City of Sunnyvale.

adjacent to the western and northern boundaries of the WPCP, and between the edge of the Bay Trail and WPCP. The outboard floodwall in this section of the project area was proposed to be between approximately 4 to 5 feet in height.

Recognizing the mutual need for a wall at this location, the City and Valley Water have developed plans for the Joint Wall, which combines segments of the WPCP perimeter wall and original Valley Water floodwall adjacent to the Sunnyvale West Channel. The Joint Wall would be approximately 1,100 feet in length and would extend from the Carl Road bridge to the northeastern edge of the WPCP (**Figure 1**). The Joint Wall would follow the same alignment as the originally proposed floodwall, except at its northeastern end, where it would include two 90 degree bends to tie into a separate portion of the proposed WPCP security wall. The overall construction footprint of the Joint Wall is substantially similar to the construction footprint associated with the originally proposed floodwalls. As such, construction of the Joint Wall would involve similar vegetation pruning where necessary around the perimeter of the WPCP and a temporary closure and detour of the Bay Trail segment adjacent to the WPCP perimeter similar to the original proposed Project.

The Joint Wall has been designed consistent with Valley Water's original floodwall design elevation of 17 feet North American Vertical Datum of 1988 (NAVD88). This elevation is based on Valley Water design criteria to provide 100-year flood protection with accommodation of up to 2.6 feet of sea level rise. Additionally, the Joint Wall would be approximately 8 feet above the existing grade and include three strands of barbed wire, consistent with City design criteria for a security wall. Construction of the Joint Wall would be conducted by the City in a manner consistent with the floodwall construction methods described in the Project EIR, including maximum excavation depth with the range provided in the Project EIR (3.5 to 18.5 feet) and use of an anchor drilled pier foundation. In addition to the 1,100 feet section of Joint Wall, Valley Water would construct a transitional section of floodwall as part of the Project to connect from the northern terminus of the Joint Wall to the Valley Water proposed floodwall along the existing levee near the downstream end of the Sunnyvale West Channel. No other modifications to floodwalls or other components of the Project are proposed.

Construction of the Joint Wall is anticipated to begin in Spring 2027. While both the City and Valley Water would have shared responsibility for the Joint Wall, the City would retain ownership due to the Joint Wall also serving as a security barrier for the WPCP. The City and Valley Water would enter into negotiated agreements to facilitate the transfer of real estate from Valley Water to the City and the construction and maintenance of the joint wall. Actions associated with the agreements include:

- Declaration that portions of Assessor's Parcel Number (APN) 015-35-012 and APN 015-35-033 are exempt surplus land;
- Execution of a Quitclaim Deed to transfer portions of those same APNs from Valley Water to the City;
- Execution of a Cost Share Agreement to define the City's and Valley Water's responsibilities for the construction of the Joint Wall and how the cost for its design and construction would be shared, and;
- Execution of an Operations and Maintenance Agreement to define the City's and Valley Water's responsibilities for the maintenance of the Joint Wall and how the cost for this maintenance would be shared.

C. CEQA Requirements

When there are changes to a project and the lead agency will take further discretionary action, CEQA⁵ provides various levels of documentation which the lead agency may prepare to evaluate project changes in the context of environmental impacts. Valley Water has prepared this EIR Addendum in compliance with Section 15164(a) of the CEQA Guidelines, which states:

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

Section 15162(a) of the CEQA Guidelines states:

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

- Substantial changes are proposed in the project which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
- (3) New information of substantial importance which was not known or could not have been know with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:
 - (A) The project will have one or more significant effects not discussed in the previous EIR or Negative Declaration;
 - (B) Significant effects will be substantially more severe than discussed in the previous EIR;
 - (C) Mitigation measures or alternatives found to not 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 measure or alternative."

In addition, Public Resources Code Section 21166 states:

W:\Resource Pros\PROJECTS WATERSHED\Sunnyvale East West\Environmental\Environmental Review\CEQA\Addenda\Third Addendum

⁵ Public Resources Code Section 21000 et seq. and California Code of Regulations Section 15000 et seq.

When an environmental impact report has been prepared for a project pursuant to this division, no subsequent or supplemental environmental impact report shall be required by the lead agency or any responsible agency, unless one or more of the following events occurs:

- (a) Substantial changes are proposed in the project which will require major revisions of the environmental impact report.
- (b) Substantial changes occur with respect to the circumstances under which the project is being undertaken which will require major revisions in the environmental impact report.
- (c) New information, which was not known and could not have been known at the time the environmental impact report was certified as complete, becomes available.

The analysis below demonstrates that implementation of the Joint Wall would not result in any of the conditions described in CEQA Guidelines Section 15162(a) or Public Resources Code section 21166 requiring preparation of a subsequent EIR and thus preparation of an Addendum is the appropriate level of environmental review necessary to comply with CEQA before approving the proposed Project change. Valley Water's decisionmaker(s) will consider this Addendum along with the Project EIR and other addenda before taking action on the proposed Project modifications.

D. Environmental Analysis

The following analysis evaluates potential environmental impacts of the Joint Wall relative to the environmental impacts disclosed in the Project EIR. Applicable best management practices (BMPs) and mitigation measures that would be implemented during construction and operation of the Joint Wall are also described. Only those environmental resources that have the potential to be affected by the proposed Project modifications are discussed in detail. The nature and level of impact from the modified Project on the following environmental resources would remain the same as or substantially similar to those impacts disclosed in the Project EIR:

- Agricultural Resources
- Biological Resources
- Cultural Resources
- Geology and Soils
- Hazards and Hazardous Materials
- Land Use and Planning
- Mineral Resources

- Noise and Vibration
- Population and Housing
- Public Services
- Recreation
- Transportation and Traffic
- Utilities and Service Systems

Table 1 provides rationale to demonstrate why the Project as modified would result in the same or substantially similar impacts to these environmental resources. All mitigation measures and BMPs previously identified in the Project EIR would still apply to the entirety of the Project, as modified.

Table 1: Resource Areas Not Affected by the Project Addition

Resource Area	Rationale for No Change to Project EIR Impacts
Agricultural Resources	No agricultural resources are present at the Project site or within its vicinity. No impacts would occur, consistent with the Project EIR.
Biological Resources	The Joint Wall would be constructed according to the same methods for floodwall construction outlined in the Project EIR and occupy a similar footprint to the originally proposed floodwall. No additional tree removal would be required and BMP BI-10 would require any necessary tree pruning prior to Joint Wall construction be reduced to the minimum feasible extent. Accordingly, there would be no change to the Project's potential to impact special-status species or their habitat, wetlands, sensitive natural communities, migratory wildlife corridors, or its potential to conflict with a plan related to habitat conservation.
Cultural Resources	No known cultural resources are present at the Project site and ground disturbance associated with Joint Wall construction would occur within a similar footprint to the originally proposed floodwall. Accordingly, there would be no change to the Project's potential to impact historical, archaeological, or paleontological resources.
Geology and Soils	The Joint Wall would be constructed according to the same methods for floodwall construction outlined in the Project EIR and occupy a similar footprint to the originally proposed floodwall. Accordingly, there would be no change to the Project's potential to create geologic hazards, soil erosion or topsoil loss, or destroy a unique geologic feature.
Hazards and Hazardous Materials	The Joint Wall would be constructed according to the same methods for floodwall construction outlined in the Project EIR and occupy a similar footprint to the originally proposed floodwall. Accordingly, there would be no change to the Project's potential to create hazards to the public or environment, exposure of the public to hazardous contamination, safety risks, conflicts with emergency response, or exposure to wildland fire.
Land Use and Planning	The Joint Wall would be a minor change to a small portion of the previously evaluated floodwalls and would be installed using the same construction methods evaluated in the Project EIR. Accordingly, there would be no change to the Project's potential to conflict with applicable land use plans, policies, regulations, or local ordinances adopted to protect environmental or biological resources.

Resource Area	Rationale for No Change to Project EIR Impacts		
Mineral Resources	No mineral resources are present at the Project site or within its vicinity. No impacts would occur, consistent with the Project EIR.		
Noise and Vibration	The Joint Wall would be constructed according to the same methods for floodwall construction outlined in the Project EIR and occupy a similar footprint to the originally proposed floodwall. Construction of the Joint Wall would not occur in proximity to any noise-sensitive land uses, such as residential areas or schools. As the Joint Wall represents a minor change to the overall footprint of previously evaluated floodwalls, there would be no associated change to ambient noise. Accordingly, there would be no change to the Project's potential to generate noise in excess of applicable standards, exposure of to excessive vibration, or increase ambient noise levels.		
Population and Housing	The Joint Wall has no potential to induce population growth or displace existing businesses or residents. No impacts would occur, consistent with the Project EIR.		
Public Services	Construction, operation, or maintenance of the Joint Wall would not require additional public services that could cause significant environmental impacts. No impacts would occur, consistent with the Project EIR.		
Recreation	The Joint Wall would be constructed according to the same methods for floodwall construction outlined in the Project EIR and occupy a similar footprint to the originally proposed floodwall. Associated construction activities would require similar temporary closures and detours on the Bay Trail to the originally proposed floodwall. Accordingly, there would be no change to the Project's potential to result in the loss or deterioration of public recreation opportunities.		
Transportation and Traffic	The Joint Wall would be constructed according to the same methods for floodwall construction outlined in the Project EIR and occupy a similar footprint to the originally proposed floodwall, which was determined not to interfere with emergency access or create safety risks. A similar number of vehicle trips to the Project site would occur during Joint Wall construction. Accordingly, there would be no change to the Project's potential to cause an exceedance of roadway capacity standards, create traffic hazards, impede emergency access or evacuation, cause parking conflicts, or interfere with adopted plans and programs supporting alternative transportation.		

Resource Area	Rationale for No Change to Project EIR Impacts
Utilities and Service Systems	The Joint Wall would be constructed according to the same methods for floodwall construction outlined in the Project EIR and occupy a similar footprint to the originally proposed floodwall. The Joint Wall has been designed to avoid known utilities during construction and would not impede access to the WPCP. Accordingly, there would be no change to the Project's potential to effect existing utilities or result in a need for utilities and service systems.

Potential impacts to Aesthetics, Air Quality, Greenhouse Gases Emissions, and Hydrology, Geomorphology, and Water Quality differing from those disclosed in the Project EIR have been identified as a result of the proposed modifications. The analysis below discusses the changed impact to Aesthetics.

Aesthetics

The Project EIR identified a significant impact related to temporary visual impacts during construction (Impact AES-1), which would be reduced to a less than significant level with implementation of Mitigation Measures AES-1 and AES-2. Mitigation Measures AES-1 and AES-2 would require visual screening for construction staging areas in residential and open space areas and minimization of fugitive light from construction, respectively. These mitigation measures would apply to the Joint Wall if construction activities require staging of equipment along the Bay Trail or evening construction.

Furthermore, implementation of BMPs AQ-1 and AQ-2 would require dust control measures to reduce the creation of dust clouds that would negatively affect short-range views in the vicinity of Joint Wall construction. BMPs BI-10, BI-11, and BI-13 would reduce short-term visual impacts of disturbed ground surfaces by minimizing disruption to woody vegetation and requiring re-planting with native species. Therefore, with previously identified mitigation and BMPs incorporated, the severity of Impact AES-1 would not change and remain less than significant with mitigation as a result of the Project modifications.

The Project EIR also identified less-than-significant impacts due to permanent alteration of visual quality due to floodwalls (Impact AES-2), permanent alteration of visual quality due to project components other than floodwalls (Impact AES-3), and creation of new light or glare sources (Impact AES-4). The Joint Wall is proposed to be approximately 8 feet in height, an increase of three to four feet compared to the originally proposed floodwall. However, the increase in wall height would be limited only to the approximately 1,100-foot Joint Wall around the perimeter of the WPCP. The Joint Wall would create additional vertical hardscape along the edge of the Bay Trail and obscure views from the Bay Trail into the WPCP. Because the Joint Wall would be constructed outboard of the Sunnyvale West Channel and Bay Trail, it would not obscure views of the surrounding landscape, including the West Channel, Pond A4, and more distant views of the Santa Cruz Mountains and Diablo Range. No new lighting or substantial sources of glare would be generated by the Joint Wall and the aesthetic impacts of all other Project components would remain the same. The Joint Wall would not substantially detract from the existing visual quality of the WPCP vicinity, including the adjacent segment of the Bay Trail. Therefore, the severity of Impact AES-2 would not substantially increase and would remain less than significant

as a result of the Project modifications. There would be no change to the severity of Impacts AES-3 and AES-4.

Therefore, Project modifications would not result in new significant impacts or substantially increase the severity of aesthetic impacts beyond those identified in the Project EIR and no new mitigation measures would be required.

Air Quality

The Project EIR identified a significant and unavoidable air quality impact that would occur as a result of emission of nitrogen oxides (NOx) above the Bay Area Air Quality Management District's (BAAQMD) recommended significance threshold during construction (Impact AIR-3). Specifically, average daily emissions of NOx were estimated to be between 78.5 and 104.4 pounds per day and the BAAQMD threshold of significant for daily emission of NOx is 54 pounds per day. This impact was found to remain significant with implementation of Mitigation Measures AQ-1 through AQ-3. Mitigation Measures AQ-1 through AQ-3 would respectively limit unnecessary idling of construction equipment, require construction equipment to be maintained to manufacturer's specifications, and require use of efficient construction equipment to the extent practical. Furthermore, BMPs AQ-1 through AQ-3 would be implemented, which respectively require implementation of the BAAQMD Basic Control measures, BAAQMD's Enhanced Dust Control Measures, and BAAQMD's Optional Control Measures, as appropriate.

Construction of the Joint Wall would utilize similar construction equipment and require a similar area of ground disturbance to what was originally evaluated in the Project EIR. As the Joint Wall would be approximately three to four feet higher than the originally proposed floodwall, its construction is anticipated to require a slight increase in operational time of construction equipment relative to what was evaluated in the Project EIR. This would correspond to a slight increase in the overall Project's air quality emissions⁸. Although Impact AIR-3 would remain significant and unavoidable, the similarities of the joint floodwall and its construction methods and the implementation of the previously identified mitigation measures and BMPs would ensure that the increase in emissions due to Project modifications would not be substantial. Therefore, the severity of Impact AIR-3 would not substantially increase as a result of the Project modifications.

The Project EIR identified less-than-significant impacts related to the project's conformance with an applicable air quality plan (Impacts AIR-1 and AIR-2). Construction and operation of the modified Project would not conflict with or impair implementation of the current BAAQMD Clean Air Plan, and thus this impact would remain less than significant. Furthermore, the Project EIR also identified less-than-significant impacts related to exposure of sensitive receptors to substantial pollutant concentrations (Impact AIR-4), or creation of objectionable odors (Impact AIR-5). The Project modifications would not alter the Project's potential to expose sensitive receptors to pollutants. No sensitive receptors are present within 1,000 feet of the Joint Wall's

W:\Resource Pros\PROJECTS WATERSHED\Sunnyvale East West\Environmental\Environmental Review\CEQA\Addenda\Third Addendum

⁶ Now known as the Bay Area Air District, but referred to as BAAQMD in this document.

⁷ Air quality modeling completed for the Project EIR used the California Air Resource Board's EMission FACtor 2011 (EMFAC2011) and the OFFROAD 2007 and OFFROAD 2011 models to estimate emissions from on-road vehicles and off-road construction equipment, respectively. Improved engine efficiency, widespread adoption of hybrid and electric vehicle technology, and more stringent regulation of air quality emission from mobile sources have occurred subsequent to the original air quality modeling. Although not quantified in this Addendum, these factors would have the overall effect of reducing emission of air quality pollutants associated with the Project.

⁸While the modified Project would not result in new significant air quality or GHG impacts or substantially increase the severity of those impacts, air quality and GHG emissions associated with the Joint Wall are anticipated to be less than the potential cumulative emissions of constructing the perimeter security wall and floodwall if they were constructed separately.

location. Therefore, the severity of Impacts AIR-1, AIR-2, AIR-4, and AIR-5 would not change and remain less than significant as a result of the Project modifications.

Therefore, Project modifications would not result in new significant impacts or substantially increase the severity of air quality impacts beyond those identified in the Project EIR and no new mitigation measures would be required.

Greenhouse Gas Emissions

The Project EIR identified less than significant impacts related to emissions of greenhouse gasses (GHGs) during construction (Impact GHG-1) and conflicts with an applicable GHG reduction plan, policy, or regulation (Impact GHG-2). As discussed in *Air Quality*, construction of the Joint Wall is anticipated to require a slight increase in operational time of construction equipment relative to what was evaluated in the Project EIR. This would correspond to a slight increase in the overall Project's GHG emissions⁸. As described in the Project EIR, there is no BAAQMD or City adopted threshold of significance for construction period GHG emissions. However, mitigation measures and BMPs which would be implemented to address air quality impacts (described in *Air Quality*) would also reduce GHG emissions by minimizing idling times and requiring use of efficient equipment. Emissions would remain negligible during operation of the modified Project and would only be generated by occasional maintenance activities requiring use of vehicles or equipment. Therefore, the severity of Impact GHG-1 would not substantially increase and remain less than significant as a result of the proposed modifications.

With the anticipated minor increase in construction GHG emissions, the modified Project would remain consistent with applicable plans, policies, and regulations, including the City's Climate Action Plan and adopted statewide targets for reduction of GHG emissions. GHG emissions would largely be limited to Project construction and as such, consistent with discussion in the Project EIR, and the modified Project would not create a long-term, substantial new source of GHG emissions. The severity of Impact GHG-2 would not change and remain less than significant as a result of the Project modifications.

Therefore, Project modifications would not result in new significant impacts or substantially increase the severity of impacts related to GHG emissions beyond those identified in the Project EIR and no new mitigation measures would be required.

Hydrology, Geomorphology, and Water Quality

The Project EIR identified a significant impact due to discharge of contaminated soil or groundwater (Impact HYD/WQ-3), which would be reduced to a less-than-significant level with implementation of Mitigation Measure HM-1. Mitigation Measure HM-1 would require Phase I and Phase II ESAs, which would identify the extent of existing soil and groundwater contamination and provide recommendations to avoid impacting water quality. The Project EIR also identifies numerous BMPs that would be applied to minimize water quality impacts (see Section 3.8 – Hydrography, Geomorphology, and Water Quality, pages 3.8-51-52)

As discussed in the Project EIR, soil contamination is known to be present in the Project vicinity and there is a potential that previously unknown soil contamination may be encountered during ground disturbing activities. Construction of the Joint Wall would require ground disturbance similar in nature (i.e., within the same range of excavation depth and footprint) to what would have been required to construct the originally proposed floodwall. The Joint Wall's alignment is also

similar to that of the originally proposed floodwall. As such, the potential for discharge of contaminated soil or groundwater associated with the Project modifications is similar to that of the original Project. Therefore, with previously identified mitigation and BMPs incorporated, the severity of Impact HYD/WQ-3 would not change and remain less than significant with mitigation as a result of the Project modifications.

The Project EIR also identified less-than-significant impacts related to erosion, sedimentation, or stream instability (Impact HYD/WQ-1) and changes in surface runoff patterns due to impermeable surfaces (Impact HYD/WQ-2). The Project would alter existing hydrologic and geomorphic conditions by enhancing the stormwater conveyance capacity of the Sunnyvale Channels, with floodwalls and enlarged levees capable of containing 100-year flood flows. The Joint Wall would follow the same alignment as the originally proposed floodwall, with the exception of two 90 degree bends at the northeastern corner of the WPCP where it would tie into another segment of the WPCP perimeter wall. A transitional section of floodwall would connect the Joint Wall with the remaining segment of the outboard Valley Water floodwall that would be constructed along the West Channel to its downstream terminus. Upon Project completion, integration of the Joint Wall with the remainder of the outboard floodwall would result in an overall alignment and footprint of the wall similar to what was evaluated in the Project EIR. Recognizing this outcome and the minor nature of the change to the wall alignment, the Joint Wall does not have the potential to substantially change the Project's potential for erosion, sedimentation, or stream instability. Therefore, the severity of Impact HYD/WQ-1 would not substantially increase and remain less than significant as a result of the Project modifications.

With respect to Impact HYD/WQ-2, Project modifications would not change the amount of impervious surface compared to that evaluated in the Project EIR and for the reasons described above, the Joint Wall would not substantially change runoff patterns. Therefore, the severity of Impact HYD/WQ-2 would not substantially increase and remain less than significant as a result of the Project modifications.

In sum, Project modifications would not result in new significant impacts or substantially increase the severity of impacts related to hydrology, geomorphology, and water quality beyond those identified in the Project EIR and no new mitigation measures would be required.

E. Conclusion

Refer to **Table 1** for a summary of environmental impacts identified in the Project EIR, change in the level of impact due to the Project modifications, and new level of impact that reflects incorporation of Project modifications into the overall level of impact. The proposed project modifications would not result in new significant environmental effects beyond those described in the Project EIR or substantially increase the severity of significant environmental effects included in the Project EIR and therefore no major revisions to the prior EIR are required.

Table 1. Comparison of Environmental Impacts

Impact	EIR Level of Impact	Change in Level of Impact with Project Modifications	Level of Impact with Project Modifications
AES-1	LTSM	No change	LTSM
AES-2	LTS	Increase, but not substantially	LTS
AES-3 and 4	LTS	No change	LTS
AIR-1 and 2	LTS	No change	LTS
AIR-3	SU	Increase, but not substantially	SU
AIR-4	LTS	No change	LTS
AIR-5	LTS	No change	LTS
BIO-1	LTSM	No change	LTSM
BIO-2	LTSM	No change	LTSM
BIO-3 and 4	LTS	No change	LTS
BIO 5	LTSM	No change	LTSM
BIO-6	LTS	No change	LTS
BIO 7, 9, and 10	LTSM	No change	LTSM
BIO-8	LTSM	No change	LTSM
BIO-11	LTSM	No change	LTSM
BIO-12	LTSM	No change	LTSM
BIO-13, 14	LTS	No change	LTS
GHG-1	LTS	Increase, but not substantially	LTS
GHG-2	LTS	No change	LTS
HM-1	LTSM	No change	LTSM
HM-2	LTS	No change	LTS
HM-3	LTSM	No change	LTSM
HYD/WQ-1	LTS	Increase, but not substantially	LTS
HYD/WQ-2	LTS	Increase, but not substantially	LTS
HYD/WQ-3	LTSM	No change	LTSM
NO-1	LTS	No change	LTS
NO-2	SU	No change	SU
NO-3	LTS	No change	LTS
NO-4	LTS	No change	LTS
TR-1	LTSM	No change	LTSM
TR-2	LTSM	No change	LTSM
TR-3	LTSM	No change	LTSM
TR-4	LTS	No change	LTS
TR-5	LTSM	No change	LTSM
UTL-1	LTSM	No change	LTSM
UTL-2	LTS	No change	LTS
UTL-3	LTS	No change	LTS

Attachment

Figure 1 – Joint Wall Alignment

LTS: Less than significant LTSM: Less than significant with mitigation SU: Significant and Unavoidable



