

**ADDENDUM TO INITIAL STUDY/MITIGATED NEGATIVE
DECLARATION (SCH No. 2018042020)
BRENTWOOD ARCO AM/PM PROJECT**

Submitted to:

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1.0 INTRODUCTION

This environmental document is an Addendum to the Brentwood ARCO AM/PM Project Initial Study/Mitigated Negative Declaration ([IS/MND] State Clearinghouse No. 2018042020), adopted in May 2018 by the City of Brentwood. Since adoption of the IS/MND, changes to the site plan and proposed uses for the previously Approved Project have been proposed (i.e. the relocation of the proposed car wash facility and removal of the previously proposed restaurant facility and drive through), thus requiring further environmental analysis. The proposed changes to the site plan and proposed onsite uses are addressed in this Addendum. As demonstrated in this Addendum, the IS/MND continues to serve as the appropriate document addressing the environmental impacts of these improvements pursuant to the California Environmental Quality Act (CEQA).

1.1 BACKGROUND

The IS/MND was prepared to address construction-level and operational impacts of the proposed ARCO AM/PM gas station project, which included a fuel station, convenience store, drive-through car wash, and a fast food restaurant to be located on the northern portion of the site in the future. The IS/MND evaluated potential environmental effects associated with full development of the gas station and the future fast-food restaurant. The environmental analysis in the IS/MND addressed the following topics: aesthetics, agriculture and forestry resources, air quality, biological resources, cultural and tribal resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, transportation/traffic, utilities and service systems, and mandatory findings of significance. All impacts in the IS/MND have been mitigated to below a level of significance through the implementation of mitigation measures.

Since adoption of the IS/MND, the site plan and operational uses previously proposed under the Approved Project were further refined to reflect input from the project sponsor, BP West Coast Products LLC (BP). Specifically, BP has determined that the Approved Project would be modified to remove the proposed fast-food restaurant facility and relocate the proposed car wash facility in its place. In addition, the Modified Project proposes to increase the footprint of the proposed car wash from 1,021 square feet to 2,363 square feet with additional support and accessory structures. The Modified Project would only reconfigure the north and southeastern portion of the project site, where the proposed fast-food restaurant and car wash facilities were originally proposed. Overall, the development of the ARCO AM/PM Project as proposed in the Modified Project would remain consistent with the uses, square footage, building heights, and overall layout as it was approved in 2018. These refinements are described in Section 2.0 of this document and are the subject of this Addendum.

1.2 PURPOSE OF ADDENDUM TO THE IS/MND

When a proposed project is changed or there are changes in the environmental setting, a determination must be made by the Lead Agency as to whether an Addendum or Subsequent EIR or MND is prepared. CEQA Guidelines Sections 15162 and 15164 sets forth criteria to assess which environmental document is appropriate. The criteria for determining whether an Addendum or Subsequent MND is prepared are outlined below. If the criteria below are true, then an Addendum is the appropriate document:

- No new significant impacts will result from the project or from new mitigation measures.
- No substantial increase in the severity of environmental impact will occur.
- No new feasible alternatives or mitigation measures that would reduce impacts previously found not to be feasible have, in fact, been found to be feasible.

Based upon the information provided in Section 3.0 of this document, the changes to the Approved Project will not result in new significant impacts or substantially increase the severity of impacts previously identified in the IS/MND, and there are no previously infeasible alternatives that are now feasible. None of the other factors set forth in Section 15162(a)(3) are present.

Therefore, an Addendum is appropriate, and this Addendum has been prepared to address the environmental effects of the refinements to the project.

1.3 CONCLUSIONS

This Addendum addresses the environmental effects associated only with refinements to the Approved Project that have occurred since adoption of the IS/MND. The conclusions of the analysis in this Addendum remain consistent with those made in the IS/MND. No new significant impacts will result, and no substantial increase in the severity of impacts will result from those previously identified in the IS/MND.

2.0 PROJECT DESCRIPTION

The proposed project (Modified Project) would include the construction and operation of an ARCO AM/PM gas station, convenience store and carwash facility. The gas station would include 18 fuel pump stations. The convenience store would be approximately 3,195 square feet. The carwash building would be approximately 2,363 square feet, and would include 13 vacuum stations. Additional project details are described below under Section 2.2.

2.1 PROJECT LOCATION AND SETTING

The approximately 2.23-acre project site is located at the northeast corner of Brentwood Boulevard and Sunset Road within the City of Brentwood. The project site is bound by Sunset Road to the south, Brentwood Boulevard to the west, Homecoming Way to the north, and McHenry Way to the east. The area to the north of the project site opposite Homecoming Way is currently vacant and undeveloped commercial land. Lands to the east of the project site opposite McHenry Way consist of Marsh Creek and the associated Marsh Creek Regional Trail, Homecoming Park, a City-owned industrial property, and single family residential uses. The parcel to the south of the project site, opposite Sunset Road and the Mokelumne Coast to Crest Trail, contains one vacant commercial building. The parcels to the west, opposite Brentwood Boulevard, consist of residential and commercial uses, including the City of Hope Church.

2.2 PROJECT MODIFICATIONS SINCE IS/MND ADOPTION

The IS/MND for the Approved Project describes the development of an ARCO AM/PM gas station with 18 fuel stations, and an associated single-story, 3,195 square foot (sf) convenience store with a 1,021-sf drive-through car wash on the southern 1.11-acre portion of the project site. Additionally, the approved project describes development assumptions for the northern 0.83-acre portion of the project site consisting of a 4,000-square-foot fast-food restaurant facility with a drive-through. The heights of the proposed structures would range from 14.5 to 24.5 feet in height. The proposed convenience store building would be approximately 24.5 feet tall at the top of the proposed logo tower, and 14.5 to 16.5 feet tall for the remainder of the building. The convenience store building would include a mix of materials, varied roof lines, and building recesses and articulations. Landscaping would be provided throughout the site. All existing structures, foundations, surfacing, etc. would be demolished and removed as part of the Approved Project.

The Approved Project also describes the development of all associated supporting infrastructure (driveways, water, sewer, etc.). Utility extensions would be installed to provide services to the project. Utility lines within the project site and adjacent roadways would be extended throughout the project site. Wastewater, water, and storm drainage lines would be connected via existing lines along the surrounding roadways (Brentwood Boulevard, Sunset Road, Homecoming Way, and McHenry Way). Sanitary sewer lines ranging in size from four to eight inches are currently located along McHenry Way and Homecoming Way. Water lines ranging in size from eight to 36 inches are currently located along Brentwood Boulevard, Sunset Road, and Homecoming Way. Additionally, non-potable water lines are present along Brentwood Boulevard and Sunset Road. Finally, eight to 18-inch storm drainage lines are currently located along McHenry Way and a portion of the Sunset Road frontage.

Access to the project site would be provided along Brentwood Boulevard, McHenry Way, and Homecoming Way. A proposed east-west roadway would be constructed through the center of the site, separating the northern and southern portions of the project site.

As noted previously, the Approved Project assumes the development of a 4,000-square-foot fast-food restaurant facility with a drive-through at the northern 0.83-acre portion of the site. However, no buildings were proposed for this portion of the site, no tenant has been identified, and the City has not received any applications for the development of this portion of the site.

Subsequent to the approval of the IS/MND, BP West Coast Products LLC (BP) determined that modifications to the Approved Project would be appropriate. As noted earlier in section 1.1 of this report, these modifications include the elimination of the assumed 4,000-square-foot fast-food restaurant facility with a drive through on the northern 0.83 acre portion of the site and the relocation and expansion of the proposed 1,021-sf drive-through car wash from the southern 1.11-acre portion of the project site to 2,363-square-foot drive-through car wash on the northern 0.83 acre portion of the project site. The proposed car wash would also include a 1,274 square foot mechanical room ancillary to the car wash facility, two 12 foot-wide-maximum concrete paved driving lanes, sidewalk and pedestrian amenities with varying widths, a curb ramp, open space and landscaping, and 13 12.5-foot by 20-foot parking spaces with stationary vacuums. To replace the car wash facility from the Approved Project, landscaping and pedestrian amenities such as a patio and four bicycle parking structures are proposed. The attached Exhibit A provides details on the location, size, and height of the proposed new structures.

The proposed modifications to the site plan, including the removal of the assumed fast food restaurant facility and the relocation of the proposed car wash facility, are the only substantive changes to the Proposed Project. As such, the Proposed Project, inclusive of the modified site plan described above, is herein referred to as the “Modified Project”. Further details regarding the Modified Project are provided below.

3.0 ENVIRONMENTAL ANALYSIS

As explained in Section 1.0, this comparative analysis has been undertaken pursuant to the provisions of CEQA Sections 15162 and 15164 to provide the City with the factual basis for determining whether any changes in the project, any changes in circumstances, or any new information since the IS/MND was certified require additional environmental review or preparation of a Subsequent MND or EIR to the IS/MND previously prepared.

As described in Section 2.0, Project Description, refinements to the project's proposed site plan and uses have occurred since the preparation and adoption of the IS/MND. Because of this, new analysis

for impacts within the project area is provided in this Addendum. It is important to note that the proposed Modified Project would not result in ground disturbance or construction activities beyond the area analyzed in the IS/MND for the Approved Project. The only proposed changes relate to the site plan, location of the carwash facility, and the removal of the fast-food restaurant.

The environmental analysis provided in the IS/MND remains current and applicable to the proposed project in areas unaffected by the design refinements for the environmental topics, as listed below:

Aesthetics: The Modified Project refinements would not result in significant impacts to aesthetic resources beyond those identified in the IS/MND. The IS/MND identified impacts to lighting that could occur on nearby properties, and mitigation was proposed to ensure that all lighting associated with the Proposed Project would conform to the City’s regulations and safety standards, with provisions for shields on all lighting fixtures. The Modified Project includes the development of the northernmost 0.83 acres of the Approved Project site and a detailed site plan has been prepared and submitted for approval. The proposed modifications to the project are not substantial changes to the originally anticipated project relating to Aesthetics. The Modified Project does not designate any new sites for development that were not contemplated and analyzed for development in the IS/MND, and would only result in minor changes to the location and footprint of the car wash facility. Therefore, there would be no new impacts to aesthetics. The mitigation identified in the IS/MND for aesthetics impacts remains applicable to the Modified Project. No new mitigation measures are required for the proposed refinements to the Approved Project.

Agriculture and Forestry Resources: The design refinements would not result in additional impacts to agriculture lands or resources beyond those identified in the IS/MND. As noted in the IS/MND, there are no prime, unique, or statewide important farmlands in the project study area. However, the site currently consists of land previously used for agricultural purposes and contains Farmland of Statewide Importance soil and Prime Farmland soil, when irrigated. Therefore, the mitigation identified in the IS/MND for agricultural impacts remains applicable to the modified project. No new mitigation measures are required for the proposed refinements.

Air Quality: The Modified Project refinements would not result in additional impacts to air quality beyond those identified in the IS/MND. The background conditions, construction equipment mix, and work hours identified in the IS/MND would remain similar, and construction-related air quality emissions and impacts would not increase as a result of the Modified Project. However, the proposed refinements would result in minor operational changes to the project once constructed, with the removal of the assumed fast food restaurant and drive through facility and relocation of the car wash facility. As shown in Table 5 of the IS/MND, the

vast majority of operational emissions from the proposed project would result from mobile source emissions (vehicles travelling to and from the project site). The removal of the 4,000 sf fast-food restaurant would significantly reduce the number of vehicle trips to the site on a daily and annual basis. While the Modified Project includes a larger carwash facility, the overall project trips (and their associated emissions) would be notably reduced with the removal of the fast-food restaurant. As such, emissions would decrease under the Modified Project. As described in the IS/MND, the proposed project would not exceed any Bay Area Air Quality Management District (BAAQMD) standards or contribute to air quality deterioration beyond BAAQMD projections. Therefore, the mitigation identified in the IS/MND for air quality impacts remains applicable to the Modified Project. No new mitigation measures are required for the proposed refinements.

Biological Resources: The Modified Project would slightly alter the site plan and proposed onsite uses, but would not increase the area proposed for disturbance, and would not increase or alter impacts to biological resources, either directly or indirectly. The mitigation measure identified in the Approved Project IS/MND for biological resources impacts remains applicable to the Modified Project. No new mitigation measures are required for the proposed refinements to the Approved Project.

Cultural Resources: Although the Modified Project would result in minor changes to the project's operational characteristics once constructed, the overall physical impacts to cultural resources during construction would not be materially different than under the Approved Project, given that the area proposed for ground disturbance would remain unchanged. Although the nature of the construction activities would be altered under the Modified Project, the extent and intensity of construction activities would not vary substantially relative to that evaluated in the Approved Project, and mitigation measures prescribed in the IS/MND would still be applicable and necessary to reduce the significance of impacts under the Modified Project.

Geology and Soils: The proposed refinements would not result in substantially different geophysical impacts beyond those identified in the IS/MND. While the Modified Project would involve minor changes to the site plan and proposed onsite uses, these changes do not represent a substantial deviation from the project analyzed in the IS/MND, and the conclusions of the IS/MND remain valid. Compliance with applicable code standards, seismic requirements, and mitigation measures identified in the IS/MND would reduce geotechnical concerns to below the level of significance.

Greenhouse Gas Emissions: The Modified Project would result in a similar duration and intensity of construction activities relative to the Approved Project. As such, construction-related GHG emissions would remain essentially unchanged. As shown in Table 11 of the IS/MND, the largest source of operational GHG emissions from the proposed project would result from mobile source GHG emissions (vehicles travelling to and from the project site). The removal of the 4,000 sf fast-food restaurant would significantly reduce the number of vehicle trips to the site on a daily and annual basis. While the Modified Project includes a larger carwash facility, the overall project trips (and their associated GHG emissions) would be notably reduced with the removal of the fast-food restaurant. As such, GHG emissions would decrease under the Modified Project. As such, the proposed project modifications would not result in an increase in greenhouse gas emissions or related impacts to global climate change or conflicts with applicable climate change plans, policies, or regulations.

Hazards and Hazardous Materials: The Modified Project would not increase the area proposed for ground disturbance, nor would it introduce new uses, beyond those addressed in the IS/MND, that could generate hazards or hazardous materials. The expanded carwash facility size would have similar impacts to those addressed in the IS/MND, and all mitigation measures related to this impact would remain applicable and be required of the project.

Hydrology and Water Quality: The Modified Project would be required, as under the Approved Project, to comply with all applicable water quality regulations during and following construction and operational activities. The mitigation identified in the IS/MND for hydrology and water quality impacts remains applicable to the Modified Project. No new mitigation measures are required for the proposed refinements to the Approved Project for hydrology and water quality.

Land Use and Planning: The Modified Project would require the same entitlements, permits, and/or other approvals as the Approved Project. The Modified Project would not result in notably increased adverse impacts on adjacent land uses, as the overall proximity and intensity of construction activities would not be substantially different than under the Approved Project. The IS/MND did not identify any potentially significant impacts to land use and planning; therefore, mitigation was not required. No new mitigation measures are required for the proposed refinements to the Approved Project for this topic.

Mineral Resources: The proposed refinements would not result in additional impacts to mineral resources beyond those identified in the IS/MND and because the project site is not located within an area of known mineral resources, either of regional or local value, the IS/MND did not identify any impacts to mineral resources; therefore, mitigation was not required. No new mitigation measures are required for the changes to the Approved Project.

Noise: The Modified Project may result in additional impacts to noise beyond those identified in the IS/MND. These potential noise impacts are related primarily to the onsite relocation of the car wash facility.

An Environmental Noise Analysis was prepared for the Approved (April 2018) Project (J.C. Brennan & Associates, Inc., 2017) which included a noise impact analysis for the gas station, convenience store with car wash facility, and assumed on-site fast food restaurant with drive through. The original Noise Analysis focused on potential noise impacts associated with construction, vehicle noise (mobile source noise), the fueling and parking island, and the carwash facility. The IS/MND determined that operational noise impacts from these sources would be less than significant, and that construction noise impacts would be less than significant.

As noted previously in this Addendum, the removal of the fast-food restaurant would result in a significant decrease in daily and peak-hour vehicle trips to and from the project site. As such, vehicle noise would be reduced under the Modified Project. Additionally, the fueling and parking island would remain unchanged from the Approved Project. As such, there would be no increase in noise associated with these onsite operations, and these noise impacts would remain less than significant with implementation of the Modified Project.

However, the Modified Project would relocate the carwash facility, which has the potential to adversely affect nearby sensitive receptors. The potential noise impacts associated with the Modified Project were addressed in a revised Noise Analysis (J.C. Brennan & Associates, Inc., 2019).

Noise levels generated by carwashes are primarily due to the drying cycle of the carwash operations. In addition, additional noise is generated by the vacuum systems, however this depends on the type of vacuum system used for the project. Newer generation car wash vacuum systems tend to include central vacuums located in an enclosure. In addition, individual vacuum hoses are generally located in a "holster" and do not create noise when not in use.

The project proposes to use the MacNeil Wash System. This is similar to the Splash Express car wash and drying systems. As a means of evaluating the potential noise impacts of the proposed car wash operations, j.c. brennan & associates, Inc. conducted noise level measurements of the car wash operations at the Splash Express car wash located at 1245 Santa Rosa Avenue, in Santa Rosa, California.

Noise measurements were conducted for the tunnel entrance and exit. In addition, noise measurements were conducted for the vacuum system. Noise measurements were conducted

using a Larson Davis Laboratories Model 820 precision integrating sound level meter. The meter was calibrated with an LDL Model CAL200 acoustical calibrator to ensure the accuracy.

Vacuum Noise Levels: The primary noise source associated with vacuum use is the central turbine. This piece of equipment is generally located inside of the proposed enclosure, and is not a large contributor to overall noise levels. Based upon noise level data provided by the vacuum manufacturer (Vacutech). Noise level data of 54 dBA are measured at a distance of 20-feet from the turbine which is enclosed in a block building with a wood truss roof. Based upon a distance of 170-feet, the turbine noise levels are predicted to be less than 20 dBA.

When the individual vacuum station nozzles are not in use, they are inserted in a "holster" which nullifies the noise due to air flow. When the nozzle is removed, and is outside of the vehicle, the levels are approximately 65 dBA Lmax at 10-feet. However, this generally occurs for less than a minute during the vacuum process. When the nozzle is located inside of the vehicle, the measured noise levels were less than 40 dBA at a distance of 10-feet. Based upon spreading out of the vacuum stations, a typical hourly Leq due to vacuum use is not expected to exceed 68 dBA Lmax, and 54 dBA Leq, at a distance of 25-feet from any portion of the linear bank of vacuum stations. This assumes all 13 vacuums are in use at one time. Overall vacuum noise levels are predicted to be approximately 37 dBA Leq at the nearest residences. This is a less than significant impact, and no additional mitigation is required.

Carwash Noise Levels: Based upon the noise measurement results, the primary noise source occurs at the exit of the tunnel. This is due to the dryer blowers which last for about 1-minute per wash cycle. Based upon the project site plan, the exit faces McHenry Way, and there are no noise-sensitive uses directly in front of the exit. However, there are residences at approximately 170-feet at a 45-degree angle to the northeast. The predicted hourly Leq at the nearest residences to the northeast, due to the car wash operations is 60 dBA Leq, 70 dBA Lmax. This assumes a -3 dBA shielding due to the angle off-set of 45 degrees to the nearest residences. The entrance to the tunnel produces noise levels which are significantly lower than the exit. Land uses to the west of the tunnel entrance are approximately 250-feet from the tunnel entrance, and are expected to be exposed to hourly noise levels of 51 dBA Leq and 54 dBA Lmax. Based upon this analysis, the project car wash operations are expected to exceed the daytime noise level criterion of 55 dBA Leq, and the nighttime noise level criteria of 45 dBA Leq and 65 dBA Lmax. Without mitigation, this is considered a potentially significant impact. The following mitigation measures would reduce potential noise impacts associated with the carwash facility to a less than significant level.

- Mitigation Measure NOI-1 is already included in the IS/MND. This measure restricts carwash operations to the hours of 7 a.m. to 10 p.m. This measure would remain in place.

The following mitigation measures shall also become project requirements, and will reduce potential noise impacts to a less than significant level:

- *Mitigation Measure NOI-2: As a means of providing the required 5 dBA noise level reduction, absorptive acoustical panels shall be installed within the car wash, nearest the exit of the car wash tunnel. It is recommended that 128 square feet of CMA acoustical panels, which are covered with a pvc vinyl, are used. This will provide the absorption required to reduce overall noise levels. The absorptive materials shall be installed prior to public use of the carwash facility.*
- *Mitigation Measure NOI-3: An acoustical baffle shall be installed immediately adjacent to the car wash dryer motors within the car wash tunnel. The lower edge of the baffle should be consistent with the clearance height of the car wash dryers and extend vertically, overlapping the upper edge of the car wash exit opening. The baffle must have a minimum absorption rating of NRC 0.9 and Sound Transmission Class (STC) rating of 27 or greater. The baffle shall be installed prior to public use of the carwash facility.*
- *Mitigation Measure NOI-4: The project applicant shall ensure that the proposed turbine/cyclone for the proposed vacuum stations be located within an enclosed building.*

While the Modified Project has the potential result in additional impacts to noise beyond those identified in the IS/MND, with implementation of the mitigation measures listed above, the proposed project would have a less than significant impact relative to this topic because it would comply with the City of Brentwood noise level standards.

Population and Housing: The Modified Project would not have any effect on population, housing, or employment in the City or region at large, as is the case for the Approved Project. No adverse impacts would occur for this environmental topic.

Public Services: The proposed refinements to the Approved Project would not result in any additional impact to public services beyond those identified in the IS/MND because they would not result in operational changes to the project that may affect public service levels or resources beyond those evaluated in the IS/MND for the Approved Project. The IS/MND did not identify any potentially significant impacts to public services; therefore, mitigation was not required. No new mitigation measures are required for the Modified Project.

Recreation: The IS/MND did not identify any permanent impacts to recreational resources; therefore, mitigation was not required. The proposed refinements to the Approved Project would not result in any additional impacts to recreation beyond those identified in the IS/MND. No new mitigation measures for recreation would be required for the proposed refinements.

Transportation/Traffic: The Modified Project would result in reduced impacts to transportation/traffic as compared to those identified in the IS/MND because the operational use of the Modified Project will have lower daily and peak hour trip rates than the Approved Project. This is due to the removal of the fast-food restaurant.

A Trip Generation Analysis was prepared for the Approved (April 2018) Project (KD Anderson & Associates, Inc., 2017) which included trip generation rates for the assumed on-site fast food restaurant with drive through and car wash facilities. According to the Analysis, as shown in Table 22 of the IS/MND, the Approved Project was projected to generate 174 net new a.m. peak hour trips and 176 net new p.m. peak hour trips. With the removal of the fast food restaurant facility and drive through facility, the Modified Project is expected to generate 93 fewer net new a.m. peak hour trips and 66 fewer net new p.m. peak hour trips than the Approved Project studied in the IS/MND. The number of vehicle trips that are expected to be generated by the development of the Approved Project has been estimated using published trip generation data contained in the ITE Trip Generation Manual. Even with a slight increase in the size and relocation of the car wash facility, the trip generation rate is expected to remain close to the generation rate as estimated by the analysis¹. The ITE Trip Generation rates for gas stations with convenience stores and car washes is based on the number of fuel positions, rather than the size (square footage) of the carwash facility. As such, the larger proposed carwash facility would not generate more peak hour vehicle trips than what was analyzed in the IS/MND. The IS/MND did not identify any near-term or cumulative impacts to transportation/traffic; therefore, mitigation was not required. No new mitigation measures are required.

Utilities and Service Systems: The Modified Project would not require or result in the construction or expansion of any public utilities beyond those required for the Approved Project. Temporary short-term and operational demands on public utilities or other infrastructure would not measurably change under the Modified Project and therefore impacts would be less than significant and no mitigation measures are required.

¹ The Institute of Transportation Engineers (ITE) publication Trip Generation Manual, 9th Edition

Mandatory Findings of Significance: With the exception of additional impacts to noise generation, the potential impacts of the Modified Project with regard to biological resources, cultural resources, and direct and indirect effects on human beings would be comparable to the Approved Project; and potentially reduced with regard to traffic given the reduction in daily trips (and related operational activity) under the Modified Project. As impacts under the Modified Project would be similar to or reduced relative to the Approved Project, impacts would be less than significant in this regard. However, additional mitigation measures to ensure a less than significant impact to noise levels would be required as part of the Modified Project.

3.1 CONCLUSIONS

Based on the information provided above, the proposed modifications to the Approved Project would not result in a measurable increase in environmental impacts over what was previously analyzed in the IS/MND, following incorporation of the new noise-related mitigation measures identified above. Based on the evidence included in the above analysis, the Modified Project as described in Section 2.0 would not result in a substantial change in the conclusions and analysis included in the IS/MND. The adopted MMRP for the Project shall be revised to incorporate these new noise mitigation measures.