

Poverty Flats Ranch UP 23-09 IS 23-20 IS/MND Side-by-Side (Jan 6, 2025 vs Apr 25, 2025)

Section / Topic	Jan 6, 2025 IS/MND	Apr 25, 2025 Redline	Impact / Why it matters
Grading Permit references (GR 25-01)	References to GR 25-01 included/cross-referenced in project materials.	GR 25-01 references removed from packet and cross-refs.	Removal obscures the scope of grading/ground disturbance and related permits → likely recirculation (§15073.5(a)).
Project description (use/scope)	Described as “ immature plant nursery ” (narrower operational implications).	Revised to “ immature plant propagation ”, broader activities (lighting, chemicals, energy, logistics).	Scope expansion can alter impact conclusions (energy, air/noise, glare, hazards) → recirculation (§15073.5(b)(1)).
Workforce / trip generation	Consistent staffing (e.g., two employees) used for trips/operations.	Text shows “ two (2) one (1) to nine (9) employees ”, materially changing daily trips/peaks.	Changed trip assumptions affect transportation safety/evacuation/noise → recirculation (§15073.5).
Comments considered with the IS/MND	Public/agency comments aligned to the earlier version; mixed metadata.	Commission/Board considered the Apr 25 redline without re-circulating comments tied to that version.	Decision-makers must consider the IS/MND together with comments on that same version (§15074(b)); may require re-notice (§15087(d)) and recirculation.
Identifier consistency (IS no., filenames)	Labels vary (IS 23-20 / IS 23-29) in notices/staff materials.	Some corrections; other inconsistencies remain across uploads.	Record integrity/notice clarity issue; re-notice may be required if confusion affected public review (§15087(d)).
Mitigation Monitoring & Reporting Program (MMRP)	Mitigations embedded in narrative; no stand-alone MMRP assigning timing/responsible party/verification.	Same—no adopted stand-alone MMRP before action.	Violates PRC §21081.6(a) (must adopt an enforceable MMRP before approval). Not a recirculation trigger by itself unless mitigation changes significance.