



## **Court of Appeal Issues New CEQA, Greenhouse Gas Opinion**

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A Court of Appeal recently ruled that a city council resolution certifying an addendum to an EIR need not separately state that a water supply assessment (WSA) was approved where the addendum discusses and incorporates the WSA. The Water Code contains no requirement for early approval of a WSA when the water supplier and lead agency are the same entity and are governed by the same entity. The petitioners claim that drought conditions required that city prepare an SEIR before approving the project was not exhausted where evidence of such conditions was not fairly before the city council when it approved the project. In approving the project, the city was not required to consider generalized concerns about greenhouse gas emissions where there was no evidence of project-specific climate change concerns before the council.

The full opinion is available here: [CREED v. San Diego](#)

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