

CHAPTER 10. SUPPLEMENTAL ANALYSIS OF THE 2023 DANA RESERVE SPECIFIC PLAN

10.1 INTRODUCTION

In June 2021, the County of San Luis Obispo (County) issued a Draft Environmental Impact Report (Draft EIR) for the Dana Reserve Specific Plan (DRSP). The DRSP contemplated in the Draft EIR included the development of a 288-acre mixed-use community including residential uses, village and flex commercial uses (including a hotel, educational/training facilities, and retail/light industrial uses), open space, trails, and a neighborhood park. and approved a development agreement, vesting tract maps, and discretionary use permits.

The Draft EIR circulated for public comment from June 16, 2022, and closed on August 1, 2022. Comment letters were received from multiple entities, including state and local agencies, non-agency organizations, and members of the public. In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15132(d) and 15088, the County prepared a Final EIR that responds to comments submitted during the Draft EIR review and consultation process.

In response to comments received during the Draft EIR review and consultation process, Dana Reserve, LLC and NKT Development, LLC, collectively referred to as the project applicant, have revised the version of the DRSP contemplated in the Draft EIR. The revisions are intended to respond to community feedback and reduce the project's environmental impacts. The revisions also incorporate modifications and clarifications requested of the project by County staff. The revised DRSP, referred to herein as the 2023 Dana Reserve Specific Plan, considered with the Final EIR is the County's preferred project and the project that will be presented to the County Board of Supervisors for action.

The Final EIR will be considered with the 2023 DRSP by the County Board of Supervisors along with the applicant's request for a Conditional Use Permit (CUP) for Oak Tree Removal and Grading/Impervious Surfaces, a Vesting Tentative Tract Map (VTTM) 3159, General Plan Amendment, annexation into the Nipomo Community Services District (NCSD) service area, and a Development Agreement.

10.1.1 Purpose of Document

According to State CEQA Guidelines Section 15162, preparation of a Supplemental EIR, or recirculation of a Draft EIR that has not yet been certified, is appropriate when one or more of the following conditions are met:

- (1) Substantial changes are proposed in the project 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;
- (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 effects 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.

The County has determined that this *Supplemental Analysis of the Dana Reserve Specific Plan* is necessary to document changes that have occurred to the DRSP since the Draft EIR was originally circulated. The changes proposed are relatively minor in nature and would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects. Additionally, no new information of substantial importance that was not known and could not have been known with the exercise of reasonable diligence at the time the Draft EIR was circulated has been identified. The County has reviewed and considered the information contained in this document and finds that the preparation of subsequent CEQA analysis that would require public circulation, or recirculation of the Draft EIR, is not necessary.

The revisions to the Draft EIR do not require recirculation because they do not provide significant new information that changes the EIR in a way that deprives the public of a meaningful opportunity to comment on a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect. The County shall consider this document with the Final EIR as part of the discretionary review of the proposed DRSP.

The DRSP and Final EIR may be viewed at the Planning and Building Department offices at 976 Osos Street, Room 200, San Luis Obispo, California.

10.2 2023 DANA RESERVE SPECIFIC PLAN REVISIONS

10.2.1 Summary of Project as Described in the Draft EIR

On June 24, 2021², the County issued the Draft EIR for the adoption of the DRSP. The DRSP and EIR are intended to provide the framework for an orderly development of the Dana Reserve consistent with the *County of San Luis Obispo General Plan*. The proposed 288-acre, mixed-use development Dana Reserve (Specific Plan Area) is located on the Nipomo Mesa adjacent to the northern boundary of the Nipomo Urban Reserve Line (URL), on the west side of U.S. Route 101, and approximately 7 miles south of the city of Arroyo Grande, San Luis Obispo County, California. The 2021 DRSP evaluated in the Draft EIR includes a residential component of 1,289 (831 single-family and 458 multi-family) units; a village and flex commercial component of up to 203,000 square feet of floor area, which includes a 60,000 square-foot hotel and 30,000-square-foot educational/training facility; 11 acres of recreation and park; 49 acres of open space, trails, and drainage basins; and various infrastructure improvements (i.e., roads). Site preparation, grading, and infrastructure improvements are planned to occur in three major phases (see Chapter 2, *Project Description*).

10.2.2 Proposed Revisions to the Dana Reserve Specific Plan

The applicant has revised the DRSP to respond to community input and to reduce the project's environmental impacts and has provided a revised 2023 Dana Reserve Specific Plan (refer to Appendix A). The changes, described in more detail below, would reduce impacts to oak trees by relocating certain neighborhoods and roadways and reduce anticipated population growth through the inclusion of deed-restricted affordable housing units and age-restricted units. A decreased population would result in fewer impacts to public services and recreational facilities and would generate fewer vehicle miles traveled (VMT), which would in turn lessen greenhouse gas (GHG) emissions.

10.2.2.1 Affordable Housing

The applicant has agreed to increase the number of deed-restricted affordable housing units from 75 to 104, which represents 8% of the total residential units proposed. The deed-restricted units would be available for low, very low, and extremely low incomes and would help the County meet its Regional Housing Needs Allocation goal for these income categories. The estimated housing size for these deed-restricted units is 2.1 persons per household, which is less than the 3.16 persons per household anticipated in the Draft EIR for non-deed-restricted units.

10.2.2.2 Age-Restricted Housing

The applicant has proposed to restrict the 417 residential units in Neighborhoods (NBDs) 7, 8, and 9 to ages 55 and older (described further below). These units would not have price restrictions or deed-restricted affordability components. The age restriction requirements would meet the requirements of Civil Code Section 51.3 and require each unit to have one resident aged 55 or older. The estimated housing size for these age-restricted units is 1.85 persons per household, which is less than the 3.16 persons per household anticipated in the Draft EIR for non-age-restricted units. This revision was made to address impacts related to unplanned population increases in Nipomo.

10.2.2.3 Collector A

The applicant proposes to relocate Collector A from Assessor's Parcel Number (APN) 091-301-030 to APN 091-301-029 (Figures 10-1a and 10-1b). The Draft EIR determined that the development of Collector A on APN 091-301-030, in conjunction with other on-site development, would result in significant impacts to the 78.3 acres of on-site coast live oak woodland and would result in the removal of approximately 96% of this sensitive natural community. The proposed relocation of Collector A one parcel to the west would avoid removal of 200 native oak trees (approximately 7.68 acres or 9.8% of on-site woodland area).

This revision also clarifies that there will be a traffic signal at Collector A and Willow Road and include new public transportation stops north of the roundabout on Collector A and two stops at the park and ride lot along Collector A.

10.2.2.4 Neighborhood 3

The applicant proposes to shift NBD 3 away from the southern property line (Figures 10-2a and 10-2b). Other revisions in the document restrict structures in NBDs 7, 8, and 9 to single-story where located adjacent to existing single-family residences. However, due to the smaller lot sizes of NBD 3, this restriction is not feasible. Instead, the applicant has shifted the entire NBD 3 cluster to the north, which adds an additional 45-foot buffer between NBD 3 and the residences to the south (from 65 feet to 110

feet). This revision was made in response to comments related to inconsistent uses between the proposed project and adjacent rural residential areas.

10.2.2.5 Neighborhoods 7 and 8

NBDs 7 and 8 are now proposed to be age-restricted (55 and older). This revision would reduce the overall population of the Specific Plan Area, as age-restricted communities typically have smaller households (1–2 persons) and no children. This revision would also reduce the impact to the existing imbalance of jobs and housing, as occupants are less likely to be in the workforce. This revision would reduce population-related impacts, such as impacts to schools and public services, which in turn would reduce impacts to VMT and GHG emissions, and the jobs and housing imbalance. This revision was made in response to public comments related to the substantial population growth.

10.2.2.6 Neighborhood 9

NBD 9 is now proposed to be age-restricted (55 and older). This revision would reduce the overall population of the Specific Plan Area, as age-restricted communities typically have smaller households (1–2 persons) and no children. This revision would also reduce the impact to the existing imbalance of jobs and housing, as occupants are less likely to be in the workforce. This revision would reduce population-related impacts, such as impacts to schools and public services, which in turn would reduce impacts to VMT and GHG emissions. This revision was made in response to public comments related to the substantial population growth.

NBD 9 has also been shifted off the ridge with the oak woodland canopy (see Figures 10-2a and 10-2b). This was accomplished by reducing the number of parcels in this neighborhood and shifting the southern segment of the neighborhood to the north slightly. The reorientation of NBD 9 would avoid the removal of 69 native oak trees adjacent to the proposed open space.

10.2.2.7 Neighborhood 10

NBD 10 has been partially relocated (see Figures 10-2a and 10-2b). The Draft EIR version of the DRSP included all of NBD 10 adjacent to the northern property line, west of the Flex Commercial (DR-FC) land use area. The Draft EIR determined that the development of this neighborhood would result in significant impacts to oak woodlands. Alternative 1 of the Draft EIR relocated NBD 10 from the northeastern portion of the project site to the central portion of the project site adjacent to the eastern side of the proposed public neighborhood park. As a result, the proposed public park would have been reduced to 6 acres in size. However, while the Alternative 1 relocation would have conserved an additional 4 acres of oak woodland habitat in the northeastern portion of the project site, it would have resulted in the removal of older and higher-quality trees, though in a lesser quantity. The proposed revision would split NBD 10 between the Draft EIR location and the Alternative 1 location. This configuration would avoid removal of 186 native oak trees. This revision was made in response to community concerns related to oak tree removal.

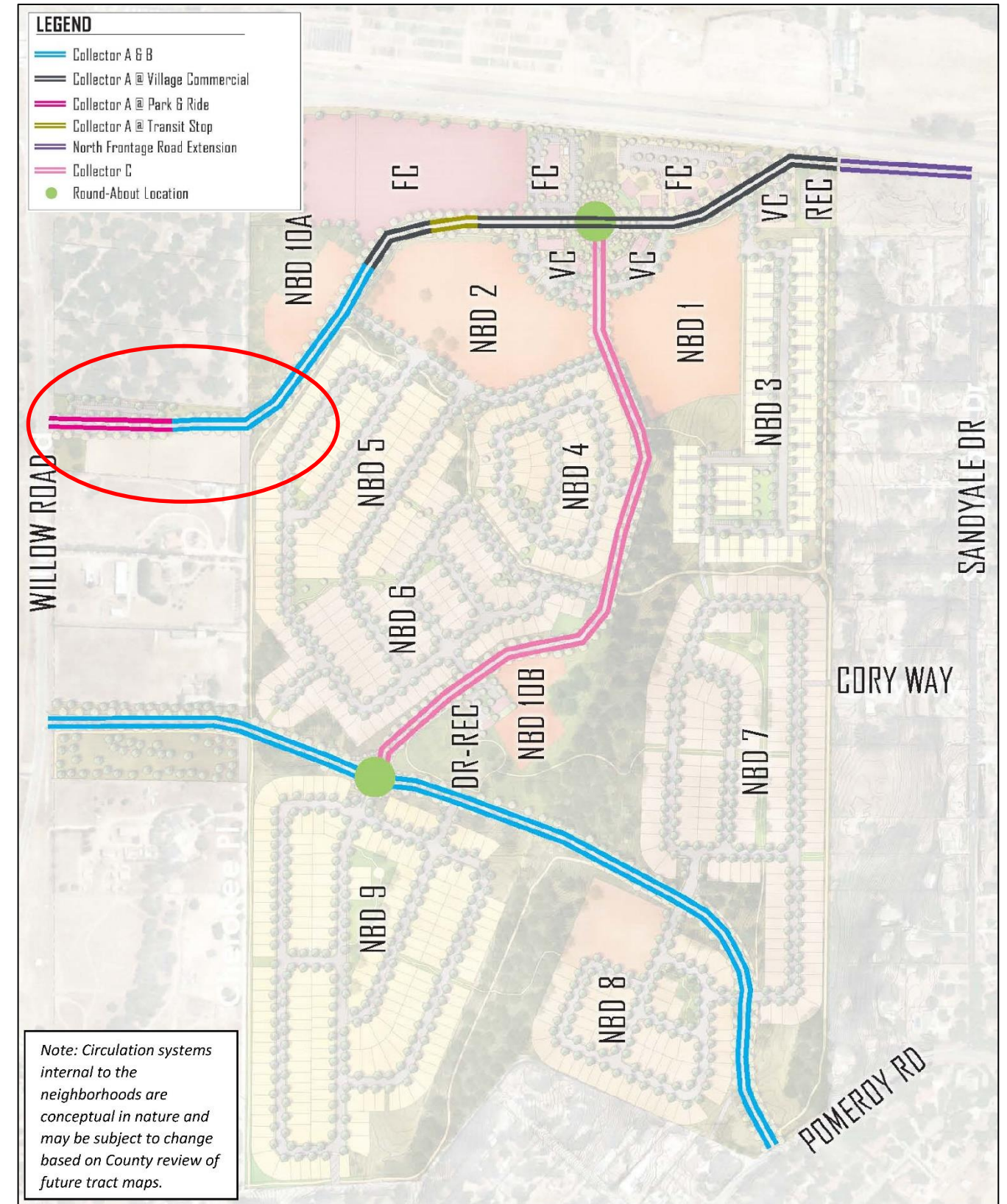
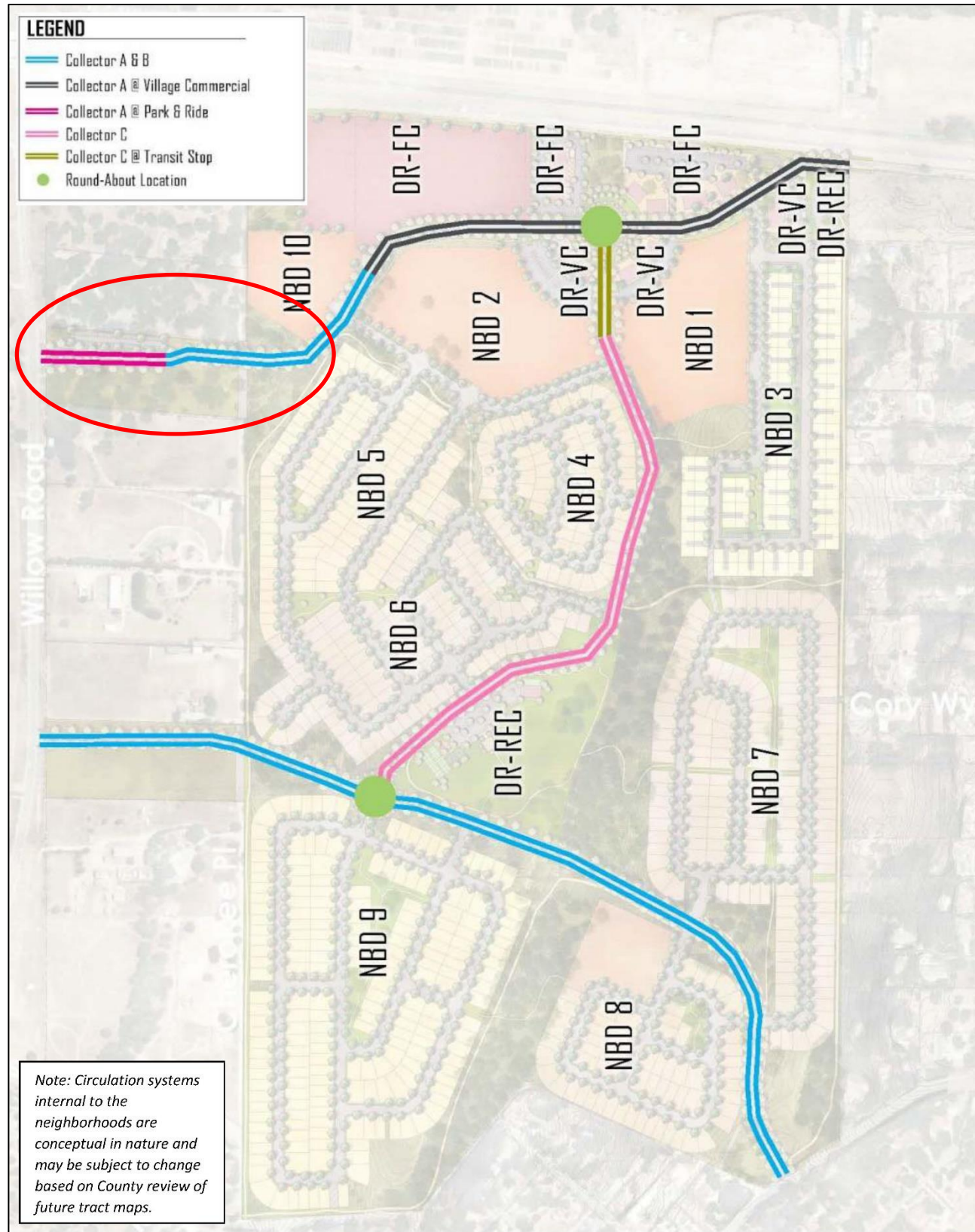


Figure 10-1a. 2021 DRSP Public Roadways.

Figure 10-1b. 2023 DRSP Public Roadways.

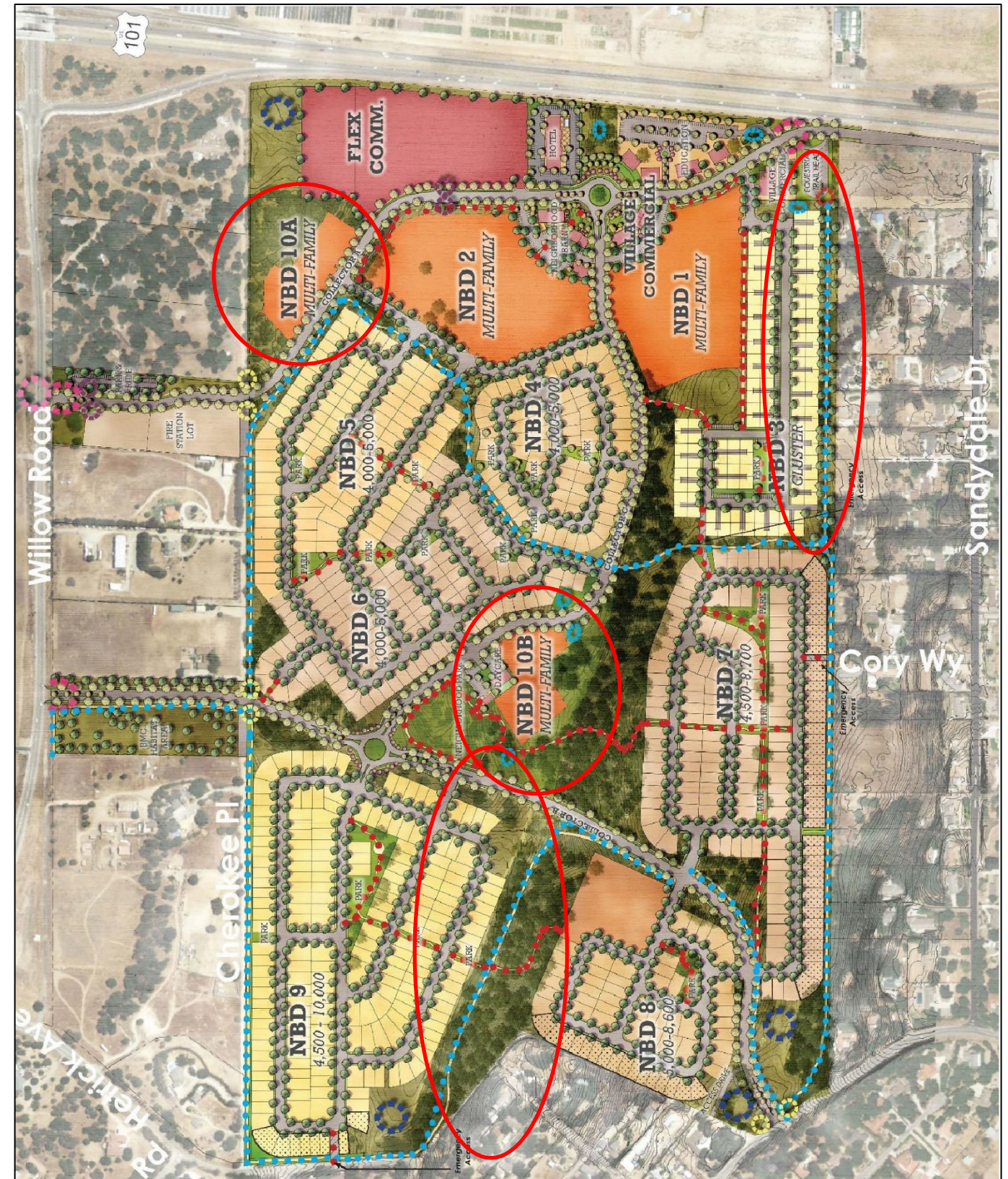


Figure 10-2a. 2021 DRSP Concept Master Plan.

Figure 10-2b. 2023 DRSP Concept Master Plan.

10.2.2.8 Public Park

The 10-acre public neighborhood park adjacent to the oak woodland area has been revised to be a neighborhood park. This park would be publicly accessible but would not be a park maintained or owned by the County. The passive park would not include playgrounds, play features, shade canopies, sport courts, interpretive/educational panels, or kiosks. The size of the park has been revised from 10 acres to 7 acres and would be retained as a passive park, with minimal improvements. The revision to a passive park would maintain a greater number of on-site oak trees and better connect and transition with the adjacent open space. Whereas the active public neighborhood park would have removed 110 native oak trees, limited ~~no~~ oak trees would be removed for the passive park.

This revision was made in response to comments from the County Department of Parks and Recreation, who commented that the County was not interested in additional neighborhood parks in this area, and in response to public comments received on the Draft EIR regarding oak woodland impacts.

10.2.2.9 Other Minor Revisions

In addition to clean-up text, the following minor revisions to the 2021 DRSP are also included in the revised 2023 DRSP:

- **Chapter 1: Introduction**
 - Minor revision to the acreage of the Residential land uses.
 - Minor revision to the density of Residential Single-Family-2 (DR-SF2). The total number of potential units did not change.
 - Increase in total number of potential units in Residential Multi-Family from 458 to 487 (+29) and associated revision to total number of potential units from 1,289 to 1,318 (+29).
 - Minor revision to the acreage of the Open Space land uses.
- **Chapter 2: Land Use and Development Standards**
 - Residential Land Uses
 - Clarification that the Residential Rural land use includes an approximately 2-acre fire station and a potential 1-acre public safety facility (Sheriff).
 - Minor revisions to the setbacks for Residential Single-Family-1 (DR-SF1) by reducing the front setback from 16 feet to 15 feet and the rear setback from 12 feet to 10 feet.
 - Minor revision to the acreage of Pocket Park Space located in NBD 3 through NBD 9. Clarification that in addition to pocket park space, one private amenity space of approximately 3 acres may be located in NBDs 7, 8, or 9 for residential use.
 - Minor revision to the minimum required private open space from 300 feet to 200 feet.
 - Revision of maximum number of stories for Residential Multi-Family (DR-MF) from three stories to four stories. The maximum height of 45 feet did not change.
 - Addition of Minimum Lot Size for DR-MF development of at least 600 square feet. This requirement does not apply to planned unit developments (PUDs), condos, or townhomes.

- Commercial Land Uses
 - Clarification that Child Day-Care with more than 12 children requires a Minor Use Permit (MUP).
 - Revise rear setback requirement of Village Commercial (DR-VC) buildings located adjacent to residential uses from 15 feet to 10 feet.
 - Revise landscape buffer of DR-FC uses to U.S. Route 101 from 10 feet to 20 feet.
 - Addition of a minimum parking requirement in DR-VC for medical offices.
 - Revision of permit requirements for commercial uses (DRSP Table 2-8) to primarily require a Conditional Use Permit (CUP) where a Site Plan (SP) or Zoning Clearance (ZC) was previously required.
- **Chapter 3: Conservation, Open Space, and Recreation**
 - Clarify that oak tree mitigation will be per the requirements of the Final EIR.
 - Minor revisions to the preliminary grading plan, including slight adjustments of pocket parks and the trail alignment around the perimeter of the Specific Plan Area, which will avoid removal of 293 native oak trees.
- **Chapter 4: Circulation**
 - Change the bicycle lane along Collectors A, B, and C from a Class IV path to a buffered Class II path.
 - Clarify that the three existing residential properties to the west of Hetrick Avenue would include gated access.
 - Addition of a new emergency access point between NBDs 3 and 7.
 - Clarify that restrooms at the trailhead would be maintained by the Homeowner's Association (HOA) or local non-profit.
 - Minor revision to the transit hub location, which will be adjacent to the DR-VC area, north of the roundabout.
- **Chapter 5: Infrastructure and Phasing**
 - Addition of a third sewer lift station in the southeast corner of the project site.
 - Clarification that the rough grading will occur in a single phase and that final and finished grading will occur in several phases.
- **Chapter 6: Public Services**
 - Notation that the applicant has offered to donate an improved 2-acre fire station at the northwest intersection corner of Collector A and Cherokee Place.
- **Chapter 7: Implementation and Administration**
 - Clarification of the development review process and permit requirements for subsequent land uses.
- **Appendix A: Objective Design Standards and Design Guidelines**
 - Addition of Objective Design Standards and Design Guidelines to (1) ensure future development is consistent with the vision and character of the Dana Reserve Specific Plan, (2) minimized environmental impacts, (3) provide direction for future subdividers, architects, and designers when preparing plans, and (4) provide direction for governmental review bodies for project evaluation when future applications come

forward while also streamlining future reviews. Specific Design Standards added to the DRSP include:

- Updates to permitting requirements for residential, commercial, and open space/recreation land uses;
- The reduction to the maximum number of stories in the multi-family land use category from four stories to three stories;
- Acreage revisions in Table 3.1;
- Trail mileage revisions on page 3-10;
- Updates to projected student generation in Table 6.3;
- Clarifications added to discussion of interpretations, adjustments, and amendments to the Specific Plan; and
- Reference to revised Appendix A of the 2023 DRSP, which includes objective design standards and design guidelines for development within the Specific Plan Area.

10.3 IMPACT ANALYSIS

The following discussion details the effects of the revisions to the DRSP, as outlined above. Only those impacts from the Draft EIR that would be affected by the proposed revisions are discussed.

10.3.1 Biological Resources

BIO Impact 15 and BIO Impact 18: The Draft EIR determined that 75.3 acres of the 78.3 acres of coast live oak woodland on-site would be removed (96%). This equated to 3,943 oak trees, including 1,073 in the coast live oak forest habitat, 2,676 in the coast live oak woodland habitat, and 194 among Burton Mesa chaparral and grassland habitats. The revisions detailed above would avoid the removal of 858 native oak trees, including trees in the coast live oak forest habitat along the ridge and removal of the oldest oak trees on the project site; the 2023 DRSP would still require the removal of approximately 3,085 oak trees. The number of oak trees to be avoided by these project changes is equivalent to approximately 21.8% of the trees originally anticipated to be removed. Additionally, the two stands of native oak trees south of NBD 10B that will be avoided will be placed into a conservation easement for permanent protection. However, this reduction in tree removal may not be enough to reduce impacts to less than significant. The proposed revisions would not result in new or more significant impacts than previously analyzed, and no new mitigation is required.

10.3.2 Greenhouse Gas Emissions

GHG Impact 1 and GHG Impact 3: The Draft EIR determined that the project would generate GHG emissions in a quantity that would be significant but could be mitigated to less than significant. However, because the emissions would be primarily associated with vehicles (79%), the project would result in significant impacts related to consistency with the regional and statewide GHG-reduction efforts related to mobile source emissions, such as the 2019 Regional Transportation Plan/Sustainable Community Plan (RTP/SCS). The addition of age-restricted housing in NBDs 7, 8, and 9 and additional deed-restricted units would result in a lower overall population within the Specific Plan Area. A lower population would result in fewer operational GHG emissions from energy use, vehicle use, waste, and water, and would result in a lesser degree of conflict with plans and policies in place for the reduction of GHG emissions. However, these reductions may not be enough to reduce GHG Impact 3 to less than significant. The proposed revisions would not result in new or more significant impacts than previously analyzed, and no new mitigation is required.

10.3.3 Land Use and Planning

LUP Impact 3: The Draft EIR determined that the project would increase the gap between housing and jobs in the community of Nipomo. The addition of age-restricted housing in NBDs 7, 8, and 9 and additional deed-restricted units would result in a lower overall population within the Specific Plan Area. A lower population would result in fewer people seeking jobs in the community, and the addition of age-restricted housing units would result in a higher population of retired persons not seeking jobs. While the jobs-to-housing ratio would not change, as the number of proposed dwelling units has not been revised, the potential adverse environmental impacts resulting from a jobs-to-housing ratio imbalance would be lessened, including vehicle commute distances and time (VMT); energy consumption, GHG emissions, and air pollutant emissions from commuters; and indirect impact on other communities that build housing, such as loss of habitat. However, these reductions may not be enough to reduce impacts to less than significant. The proposed revisions would not result in new or more significant impacts than previously analyzed, and no new mitigation is required.

LUP Impact 4: The Draft EIR determined that the project would increase regional VMT and would generate VMT per employee above thresholds, and therefore would be inconsistent with certain policies in the *County of San Luis Obispo General Plan Conservation and Open Space Element (COSE)*. The addition of age-restricted housing in NBDs 7, 8, and 9 and additional deed-restricted units would result in a lower overall population within the Specific Plan Area. A lower population would result in fewer people driving, which in turn would result in fewer vehicle commute distances and time (VMT); energy consumption, GHG emissions, and air pollutant emissions from commuters. This impact was determined to be less than significant and the proposed revisions would further reduce the significance of the impact, though not likely to the point of not needing the proposed mitigation. The proposed revisions would not result in new or more significant impacts than previously analyzed, and no new mitigation is required.

LUP Impact 7: The Draft EIR determined that the project would be inconsistent with the policies in the COSE related to the preservation of views of oak woodlands. As discussed above in Section 3.1, the proposed revisions to the DRSP would result in the non-removal of approximately 21.8% of the trees originally anticipated to be removed, including trees in the coast live oak forest habitat along the visually prominent ridge. This impact was determined to be less than significant and the proposed revisions would further reduce the significance of the impact, though not likely to the point of not needing the proposed mitigation. The proposed revisions would not result in new or more significant impacts than previously analyzed, and no new mitigation is required.

10.3.4 Population and Housing

PH Impact 1: The Draft EIR determined the project would induce substantial unplanned population growth in the Nipomo area and would have the potential to generate a population of 4,555, based on an average household size of 3.16 persons. This was determined to result in a total population of 22,284 in the unincorporated community of Nipomo by 2030, approximately 14.3% higher than the population projected for 2030 derived from buildout population projections. The estimated housing size for the 104 proposed deed-restricted units is 2.1 persons per household, the estimated housing size for the anticipated ADUs is 1.5 persons/household, and the estimated housing size for the proposed age-restricted units is 1.85 persons per household, which are less than the 3.16 persons per household anticipated in the Draft EIR for non-deed-restricted and non-age-restricted units. This would result in approximately ~~817~~ ⁵⁶⁴ fewer persons than originally anticipated by the Draft EIR (an approximate 18.2% reduction). These revisions would result in less unplanned population growth than previously analyzed in the Draft EIR but are unlikely to reduce impacts to less than significant. The proposed revisions would not result in new or more significant impacts than previously analyzed, and no new mitigation is required.

10.3.5 Public Services

PS Impact 1 through PS Impact 5: The Draft EIR determined that the project would result in the need for additional fire protection services, but not police, school, park, or library services. Mitigation was included that requires the applicant to dedicate land for a new fire station in the community of Nipomo. PS Impact 1 was determined to be less than significant with mitigation and PS Impact 2 through PS Impact 5 were determined to be less than significant, without mitigation.

As discussed above in Section 10.3.4, the inclusion of additional deed-restricted units and the inclusion of age-restricted units in NBDs 7, 8, and 9 would result in less overall population than anticipated in the Draft EIR. Less population growth would lessen the impact on public services, including police, fire, parks, and libraries. Although senior residential areas tend to have a higher frequency of service calls, particularly for medical emergencies, the proposed project would not feature assisted living, healthcare or similar facilities, which generally generate more calls than age-restricted housing. It is expected that any rise in service calls due to the shift of NBDs 7, 8, and 9 to age-restricted housing will be balanced out by the overall decrease in population. The Draft EIR determined that a new fire station is needed in the Nipomo area, and the project has identified a site within the Specific Plan Area for the future development of a fire station. The shift of NBDs 7, 8, and 9 to age-restricted housing would not necessitate the need for a second new fire station in the Nipomo area and would not result in any increased potential for physical adverse effects on the environment due to the construction or expansion of such facilities.

Additionally, the inclusion of age-restricted units would reduce the demand on the Lucia Mar Unified School District facilities as these units would not typically be expected to house school-aged children. These impacts were determined to be less than significant and the proposed revisions would further reduce the significance of the impact, though not likely to the point of not needing the proposed mitigation for PS Impact 1. The proposed revisions would not result in new or more significant impacts than previously analyzed, and no new mitigation is required.

10.3.6 Recreation

REC Impact 1: The Draft EIR determined that the project could result in an increase of use of existing recreation facilities, but that construction of proposed on-site facilities would reduce this demand. As discussed above, the inclusion of additional deed-restricted units and the inclusion of age-restricted units for NBDs 7, 8, and 9 would result in less population growth than anticipated in the Draft EIR. Less population growth would lessen the impact on existing neighborhood, community, or regional parks and recreational facilities than previously anticipated in the Draft EIR. This impact was determined to be less than significant and the proposed revisions would further reduce the significance of the impact. The proposed revisions would not result in new or more significant impacts than previously analyzed, and no new mitigation is required. The change in park uses in the 2023 Specific Plan also eliminates any project inconsistencies with County policies related to parks and recreation.

10.3.7 Transportation

TR Impact 3: The Draft EIR determined buildout of the DRSP would exceed the County residential VMT per capita threshold and overall VMT threshold and therefore would not be consistent with State CEQA Guidelines Section 15064.3(b). As discussed above, the inclusion of additional deed-restricted units and the inclusion of age-restricted units for NBDs 7, 8, and 9 would result in less population growth than anticipated in the Draft EIR. Less population growth would result in fewer vehicle miles traveled. However, these reductions may not be enough to reduce impacts to less than significant. The proposed

revisions would not result in new or more significant impacts than previously analyzed, and no new mitigation is required.

10.3.8 Utilities and Service Systems

USS Impact 3: The Water Supply Assessment (WSA) and Draft EIR determined that the NCSD is projected to have sufficient water supply to serve the existing service area, the DRSP, and reasonably foreseeable future water supply demands during normal, single dry, and multiple dry year conditions. Despite these projections, the reliability of future water supply is uncertain ~~there may not be sufficient water supplies to serve the existing service area, the proposed project, and reasonably foreseeable future demands during normal, single dry, and multiple dry year conditions~~ due to the unknown timing of buildout of the DRSP and the uncertain reliability of future water supply due to the potential for prolonged periods of drought and increasing water demands due to population growth. As discussed above, the inclusion of additional deed-restricted units and the inclusion of age-restricted units for NBDs 7, 8, and 9 would result in approximately 18⁴% less population growth than anticipated in the Draft EIR. Reducing population growth could alleviate the pressure on water supply demand by a similar amount. This impact was determined to be less than significant with the incorporate of mitigation requiring proof of water availability; the proposed revisions would further reduce the significance of the impact, though not likely to the point of not needing the mitigation. The proposed revisions would not result in new or more significant impacts than previously analyzed, and no new mitigation is required.

10.4 CONCLUSION

The 2023 DRSP does not involve any conditions that require preparation of a subsequent or supplemental EIR, or recirculation of the Draft EIR. This document demonstrates that the proposed revisions do not result in any new or substantially increased significant environmental effects pursuant to State CEQA Guidelines Section 15162(a)(1) and Section 15162(a)(2). The 2023 DRSP will not result in a new significant impact or a substantial increase in the severity of an impact identified in the Final EIR pursuant to State CEQA Guidelines Section 15162(a)(3)(A) and Section 15162(a)(3)(B). Furthermore, no new information of substantial importance exists that indicates that there are mitigation measures or alternatives that are considerably different from those analyzed in the Final EIR that will substantially reduce one or more significant effects on the environment, and that the project proponents have declined to adopt the mitigation measure or alternative pursuant to State CEQA Guidelines Section 15162(a)(3)(D).