

# **CHAPTER 11. SUPPLEMENTAL ANALYSIS OF THE 2024 DANA RESERVE SPECIFIC PLAN**

## **11.1 INTRODUCTION**

In June 2022, the County of San Luis Obispo (County) issued a Draft Environmental Impact Report (EIR) for the Dana Reserve Specific Plan (DRSP) project. 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. The DRSP also included a development agreement, vesting tentative tract maps, annexation into the NCSA service area, 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 an Administrative Final EIR (2023 Final EIR) that responded 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, revised the version of the DRSP contemplated in the Draft EIR, referred to herein as the 2023 Dana Reserve Specific Plan. The revisions within the 2023 DRSP were intended to respond to community feedback and reduce the project's environmental impacts. The revisions also incorporated modifications and clarifications requested of the project by County staff.

The 2023 DRSP and 2023 Final EIR were presented to the County Planning Commission on September 28, October 23, and October 24, 2023, where several revisions to the DRSP were requested. As a result, the project applicant further revised the DRSP, referred to herein as the 2024 Dana Reserve Specific Plan (2024 DRSP). Thus, revisions to the proposed Final EIR were prepared and have been documented in this section.

The 2024 Final EIR will be considered with the 2024 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, Vesting Tentative Tract Map (VTTM) 3159, and a Development Agreement.

### **11.1.1 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 2024 Dana Reserve Specific Plan* is necessary to document changes that have occurred to the DRSP since the Draft EIR was originally circulated and/or reviewed by the County Planning Commission. 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 will consider the proposed Final EIR with the proposed 2024 DRSP as part of the discretionary review of the proposed project.

The 2024 DRSP and Final EIR may be viewed at the County Planning and Building Department offices at 976 Osos Street, Room 200, San Luis Obispo, California.

## **11.2 2024 DANA RESERVE SPECIFIC PLAN REVISIONS**

### **11.2.1 Summary of Project as Described in the Draft EIR**

On June 24, 2021, the County issued a Notice of Preparation of a 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*).

## **11.2.2 Proposed Revisions to the Dana Reserve Specific Plan**

The applicant has revised the DRSP to respond to input from the public and Planning Commission and has provided a revised 2024 Dana Reserve Specific Plan (available on the County’s website at: <https://agenda.slocounty.ca.gov/iip/sanluisobispo/file/getfile/160657>). The changes, described in more detail below, would help achieve the County’s Regional Housing Needs Allocation (RHNA) goals by increasing the amount of affordable housing proposed by the project and as directed by the Planning Commission.

### **11.2.2.1 Affordable Housing**

The applicant has agreed to increase the number of deed-restricted affordable housing units from 104 to 156, which represents approximately 11% 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 RHNA goals for these income categories. These additional 52 units would be located in Neighborhoods (NBDs) 10A and 10B, as discussed below.

#### **11.2.2.2 Neighborhoods 10A and 10B**

As discussed in Chapter 10 *Supplemental Analysis of the 2023 Dana Reserve Specific Plan*, the location of NBD 10 would be altered and split into NBD 10A and 10B. According to the Draft EIR, NBD 10 originally consisted of 75 units. As described in Chapter 10, NBDs 10A and 10B consisted of 52 units each, for an increased total of 104 deed-restricted units; the potential environmental impacts associated with the increase of units from 75 to 104 are described in Chapter 10. As discussed above, the 2024 DRSP proposes to further increase the number of deed-restricted affordable housing units from 104 to 156, which would still be built within NBDs 10A and 10B. These additional 52 units would be split between NBDs 10A and 10B.

#### **11.2.2.3 Accessory Dwelling Units**

In addition to increasing the number of deed-restricted affordable homes within the DRSP, the 2024 DRSP requires, at minimum, the construction of 100 accessory dwelling units (ADUs). The ADUs will be included in NBDs 4, 5, 6, 7, 8, and/or 9. The Draft EIR estimated that approximately 152 ADUs could potentially be built as a result of the project. As discussed in the Draft EIR, actual ADU construction has fallen significantly short of County predictions. Requiring the construction of 100 ADUs will ensure that additional affordable housing units will be generated by the project and will move the County closer to achieving its RHNA goals and accomplishing the underlying purpose and objectives of the project. The remaining ADUs assumed and analyzed within the Draft EIR may still be constructed at a later date and were accounted for in the Draft EIR’s analysis of the potential construction of a total of 152 ADUs.

#### **11.2.2.4 Age-Restricted Housing**

At the request of the Planning Commissions, the 2024 DRSP no longer proposes to restrict the 417 residential units in NBDs 7, 8, and 9 to ages 55 and older, as was previously proposed in *Chapter 10: Supplemental Analysis of the 2023 Dana Reserve Specific Plan* in response to the recommendation of the County Planning Commission. As this was not a part of the original analysis in the Draft EIR, the removal of this restriction would have no effect on any of the impact determinations of the project.

### 11.2.2.5 **Other Minor Revisions**

In addition to clean-up text, the following minor revisions to the 2023 DRSP are also included in the revised 2024 DRSP:

- **Chapter 2: Land Use and Development Standards**
  - Updated *Table 2.1: Land Use Summary* to reflect increased unit counts at NBDs 10A and 10B areas per Planning Commission direction and expanded Open Space land use area adjacent to NBD 10B to maintain additional oak trees.
  - Updated *Section 2.3.8: Affordable Housing* text to reflect increased unit counts at NBDs 10A and 10B and identify 100 ADUs to be constructed as part of project per Planning Commission direction.
  - Updated *Section 2.4.2, Commercial Policy 4.a* to include “residential” per Planning Commission direction.
  - Updated *Table 2.7: Commercial Development Standards* to include minimum parking requirements for Residential land use category per Planning Commission direction.
  - Updated *Table 2.8: Commercial Use Table* to include “Alternative Fueling Stations” as a use for consistency with the Final EIR and added “Residential” as a use per Planning Commission direction.
  - Revised *Table 2.10: Recreation and Open Space Development Standards* to remove minimum parking requirement footnote regarding calculation method.
  - Revised *Table 2.11: Recreation and Open Space Use Table* to simplify Temporary Events use and require a Minor Use Permit.
- **Chapter 3: Conservation, Open Space, and Recreation**
  - Revised *Table 3.1: Recreation and Open Space Land Use Summary* acreages to reflect the relocation of Recreation land use category acreage to the Open Space land use category to maintain additional oak trees.
  - Revised *Section 3.2: Conservation and Open Space* text to reflect the relocation of Recreation land use category acreage to the Open Space land use category to maintain additional oak trees.
  - Revised *Section 3.3: Recreation* and *Section 3.3.1: Recreation Amenities* text to reflect updated park acreage due to expanded NBDs 10A and 10B per Planning Commission direction and expanded Open Space land use category to maintain additional oak trees.
  - Revised *Table 3.2: Required Parkland* to reflect increased unit counts at NBDs 10A and 10B per Planning Commission direction.
  - Provided additional text in *Section 3.3.1: Recreation Amenities* and *Section 3.3.2: Recreation Goals, Objectives, and Policies* related to incorporation of native plants within pocket park areas.
- **Chapter 4: Circulation**
  - Revised *Section 4.2: Street Network* text related to Collector B to add clarifying text that there will be one-way stop intersections at Pomeroy Road and Willow Road.
- **Chapter 5: Infrastructure and Phasing**
  - Revised *Section 5.2: Water* and *Table 5.1: DRSP Water Use Factor and Demand* to reflect increased unit counts at NBDs 10A and 10B and ADUs to be constructed or reasonably expected as part of project per Planning Commission direction and to ensure consistency with Water Supply Assessment (WSA).

- Revised *Section 5.3: Wastewater* and *Table 5.2: DRSP Wastewater Generation* to reflect increased unit counts at NBDs 10A and 10B and ADUs to be constructed or reasonably expected as part of project per Planning Commission direction.
- **Chapter 6: Public Services**
  - Revised *Table 6.2: Student Generation* and *Table 6.3: Anticipated Student Generation Rate* to reflect the increased unit count at NBDs 10A and 10B and the removal of age-restriction at NBDs 7, 8, and 9 per Planning Commission direction.
  - Revised *Section 6.4: Fire and Emergency Services* to include clarifying text regarding improvements on Collector A related to the fire station site.

## 11.3 IMPACT ANALYSIS

The following discussion details the effects of the revisions to the 2023 DRSP, as outlined above. Only those impacts from the Draft EIR that would be affected by the proposed revisions are discussed.

### 11.3.1 Air Quality

**AQ Impact 1:** The Draft EIR found that with implementation of Mitigation Measures AQ/mm-3.1 through AQ/mm-3.3 and TR/mm-3.1, the project would be consistent with alternative transportation and employee VMT reduction strategies included in the SLOAPCD CAP and PM reduction requirements of SB 656. However, the project would increase regional VMT and would be potentially inconsistent with the jobs-to-housing balance included in the SLOPACD CAP. No feasible mitigation has been identified that would reduce these impacts to below applicable thresholds. Therefore, impacts related to consistency with applicable air quality plans were found to be significant and unavoidable. The additional affordable housing units and required ADUs proposed by the 2024 DRSP would be consistent with the proposed mitigation and would not substantially change or substantially increase this impact. As a result, impacts would remain *significant and unavoidable*.

**AQ Impact 2:** The Draft EIR found that off-site improvements associated with the project would not conflict with an applicable air quality plan, and impacts would be less than significant. The 2024 DRSP does not propose any revisions that would alter the off-site improvements associated with the project. As a result, impacts would remain *less than significant*.

**AQ Impact 3:** The Draft EIR found that with implementation of Mitigation Measures AQ/mm-3.1 and AQ/mm-3.2, construction-related impacts related to the generation of air pollutant emissions in exceedance of established SLOAPCD thresholds were found to be less than significant. However, even with implementation of Mitigation Measures AQ/mm-3.3 and TR/mm-3.1, operational impacts related to air pollutant emissions would exceed SLOAPCD established daily emissions thresholds. Therefore, this impact was considered to be significant and unavoidable.

The Draft EIR's analysis was based on an Air Quality & GHG Analysis prepared by AMBIENT. As such, the project applicant retained AMBIENT to prepare an updated Air Quality & GHG Analysis to evaluate potential air quality related impacts of buildout of the 2024 DRSP, compared to the original impacts evaluated in the Draft EIR. Table 11-1 shows the operational air quality emissions presented in the Draft EIR.

**Table 11-1. Operational Emissions without Mitigation (2021 DRSP)**

Operational Period/Source	Emissions <sup>1</sup>						
	ROG	NOx	ROG+NOx	CO	PM <sub>10</sub>		
					Fugitive	Exhaust	Total
<b>Daily Emissions (lbs/day)</b>							
Area Source	59.5	1.4	60.9	118.8	0	0.7	0.7
Energy Use	1.0	8.5	9.5	4.2	0	0.7	0.7
Mobile	34.9	54.7	89.6	350.2	115.8	0.7	116.5
<b>Total Project Emissions</b>	<b>95.4</b>	<b>64.6</b>	<b>160.0</b>	<b>473.3</b>	<b>115.8</b>	<b>2.0</b>	<b>117.8</b>
<b>SLOAPCD Significance Thresholds</b>	--	--	<b>25</b>	<b>550</b>	<b>25</b>	<b>1.25</b>	--
Exceeds SLOAPCD Thresholds?	--	--	<b>Yes</b>	No	<b>Yes</b>	<b>Yes</b>	--
<b>Annual Emissions (tons/year)</b>							
<b>Total Project Emissions</b>	<b>15.6</b>	<b>10.1</b>	<b>25.7</b>	<b>72.0</b>	<b>17.6</b>	<b>0.3</b>	<b>17.9</b>
<b>SLOAPCD Significance Thresholds</b>	--	--	<b>25</b>	--	<b>25</b>	--	--
Exceeds SLOAPCD Thresholds?	--	--	<b>Yes</b>	--	No	--	--

Source: AMBIENT (2022)

Note: Based on operational year of 2030 for Hotel, Commercial, Educational, and Residential. Totals may not sum due to rounding. Refer to EIR Appendix D for modeling output files and assumptions.

<sup>1</sup> Daily emissions are based on the highest emissions for summer or winter operational conditions for buildout conditions. Totals may not sum due to rounding.

As shown above, the Draft EIR found that the project would exceed SLOAPCD’s daily operational thresholds for ROG+NOx, fugitive PM<sub>10</sub>, and exhaust PM<sub>10</sub>. ROG+NOx emissions would also exceed SLOAPCD’s annual threshold. Table 11-2 demonstrates the operational air pollutant emissions associated with the revisions included in the 2024 DRSP.

**Table 11-2. Operational Emissions without Mitigation (2024 DRSP)**

Operational Period/Source	Emissions <sup>1</sup>						
	ROG	NOx	ROG+NOx	CO	PM <sub>10</sub>		
					Fugitive	Exhaust	Total
<b>Daily Emissions (lbs/day)</b>							
Area Source	58.47	0.80	59.27	86.78	0	0.040	0.04
Energy Use	0.15	1.42	1.57	1.19	0	0.10	0.10
Mobile	65.10	51.66	116.77	418.19	96.46	0.82	97.25
<b>Total Project Emissions</b>	<b>123.73</b>	<b>53.88</b>	<b>177.61</b>	<b>506.17</b>	<b>96.46</b>	<b>0.97</b>	<b>97.40</b>
<b>SLOAPCD Significance Thresholds</b>	--	--	<b>25</b>	<b>550</b>	<b>25</b>	<b>1.25</b>	--
Exceeds SLOAPCD Thresholds?	--	--	<b>Yes</b>	No	<b>Yes</b>	<b>Yes</b>	--
<b>Annual Emissions (tons/year)</b>							
<b>Total Project Emissions</b>	<b>19.36</b>	<b>7.61</b>	<b>26.98</b>	<b>67.86</b>	<b>12.99</b>	<b>0.32</b>	<b>13.31</b>
<b>SLOAPCD Significance Thresholds</b>	--	--	<b>25</b>	--	<b>25</b>	--	--
Exceeds SLOAPCD Thresholds?	--	--	<b>Yes</b>	--	No	--	--

Source: AMBIENT 2022, revised June 8, 2023

Note: Based on operational year of 2030 for Hotel, Commercial, Educational, and Residential. Totals may not sum due to rounding. Refer to EIR Appendix D for modeling output files and assumptions.

<sup>1</sup> Daily emissions are based on the highest emissions for summer or winter operational conditions for buildout conditions. Totals may not sum due to rounding.

As shown above, the 2024 DRSP would exceed SLOAPCD's daily thresholds for ROG+NO<sub>x</sub>, fugitive PM<sub>10</sub>, and exhaust PM<sub>10</sub>. ROG+NO<sub>x</sub> emissions would also exceed SLOAPCD's annual threshold. As such, the revisions proposed by the 2024 DRSP would not cause the project to exceed any additional SLOAPCD air quality thresholds, nor would it substantially increase any of the existing exceedances found by the Draft EIR. Furthermore, the additional affordable housing units and required ADUs proposed by the 2024 DRSP would not conflict with the implementation of the proposed mitigation. As a result, impacts would remain *significant and unavoidable*.

**AQ Impact 4:** The Draft EIR found that off-site improvements associated with the project could result in a cumulatively considerable net increase of criteria pollutants in exceedance of established SLOAPCD emissions thresholds. However, with the implementation of Mitigation Measures AQ/mm-3.1 and AQ/mm-3.2, impacts were found to be less than significant. The additional affordable housing units and required ADUs proposed by the 2024 DRSP would be consistent with the proposed mitigation and would not substantially increase this impact. As a result, impacts would remain *less than significant*.

**AQ Impacts 5 and 6:** The Draft EIR found that the project, and off-site improvements associated with the project could expose sensitive receptors to substantial pollutant concentrations. However, with implementation of Mitigation Measures AQ/mm-3.1, AQ/mm-3.2, and AQ/mm-5.1, potential impacts related to exposure of sensitive receptor locations to substantial pollutant concentrations were found to be less than significant. As shown above in table 11.3-2, the 2024 DRSP would not result in any substantial increase in air quality pollutant emissions. Further, the additional affordable housing units and required ADUs proposed by the 2024 DRSP would be consistent with the proposed mitigation and would not substantially increase this impact. As a result, impacts would remain *less than significant*.

**AQ Impacts 7 and 8:** The Draft EIR found that the project and off-site improvements associated with the project could result in other emissions, such as those leading to odors, that may adversely affect a substantial number of people. However, with implementation of Mitigation Measures AQ/mm-3.1, AQ/mm-3.2, AQ/mm-5.1, and AQ/mm-7.1, potential impacts related to exposure of people to objectionable odors would be less than significant. The additional affordable housing units and required ADUs proposed by the 2024 DRSP would be consistent with the proposed mitigation and would not substantially increase this impact. As a result, impacts would remain *less than significant*.

**AQ Impact 9:** The Draft EIR found that the project would result in cumulatively considerable impacts related to air quality. As discussed above, the 2024 DRSP would not result in any additional air quality impacts, nor would it substantially increase or reduce the existing impacts found by the Draft EIR. Further, the additional affordable housing units and required ADUs proposed by the 2024 DRSP would be consistent with all of the mitigation measure proposed by the Draft EIR. As a result, cumulative air quality impacts would continue to be *significant and unavoidable*.

### **11.3.2 Biological Resources**

**BIO Impacts 15 and 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 808 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. This is equivalent to approximately 21% 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. As proposed revisions would not result in

new or more significant impacts than previously analyzed, no new mitigation is required, and impacts would remain *significant and unavoidable*.

### 11.3.3 Greenhouse Gas Emissions

**GHG Impact 1:** 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, and incorporated AQ/mm-3.1, AQ/mm-3.3, GHG/mm-1.1, and TR/mm-3.1. As shown in table 11.3-3, the proposed revisions would not result in new or more significant impacts than previously analyzed, and no new mitigation is required.

The Draft EIR’s analysis was based on an Air Quality & GHG Analysis prepared by AMBIENT. As such, the County retained AMBIENT to prepare an updated Air Quality & GHG Analysis to evaluate potential GHG related impacts of buildout of the 2024 DRSP, compared to the original impacts evaluated in the Draft EIR.

As discussed in the Draft EIR, construction-related GHG emissions would total approximately 29,618.8 MTCO<sub>2</sub>e. Amortized GHG emissions, when averaged over the assumed 30-year life of the project, would total approximately 987.3 MTCO<sub>2</sub>e per year. Table 11-3 displays the GHG emissions associated with the 2024 DRSP after the implementation of the identified mitigation measures.

**Table 11-3. Operational GHG Emissions With Mitigation (2024 DRSP)**

Operational Year/Source	2030 GHG Emissions (MTCO <sub>2</sub> e/year)
Area Source <sup>1</sup>	34.7
Energy Use <sup>2</sup>	550.7
Motor Vehicles <sup>3</sup>	11,935.4
Waste <sup>4</sup>	167.3
Water <sup>5</sup>	119.5
<b>Total Operational Emissions:</b>	<b>12,807.6</b>
<b>Amortized Construction Emissions:</b>	<b>987.3</b>
<b>Amortized Loss of Carbon Sequestration Emissions<sup>6</sup></b>	<b>394.9</b>
<b>Total with Loss of Carbon Sequestration and Amortized Construction Emissions:</b>	<b>14,192.2</b>
Service Population (SP) <sup>7</sup>	5,082
MTCO <sub>2</sub> e/SP	2.79
<b>GHG Efficiency Significance Threshold:</b>	<b>2.9</b>
<b>Exceeds Threshold?</b>	<b>No</b>

Source: AMBIENT (2024)

Note: Totals may not sum due to rounding. Refer to EIR Appendix D for modeling assumptions and results.

<sup>1</sup> Area source includes emissions associated primarily with the use of landscape maintenance equipment.

<sup>2</sup> Includes adjustment for California Renewable Portfolio Standards requirements and a minimum average reduction of 70 percent in residential electricity use with installation of on-site residential solar PV systems and compliance with applicable building energy-efficiency standards (PG&E 2022). Does not include emissions associated with natural gas per mitigation measure GHG-1.

<sup>3</sup> Based on the default fleet mix for land uses contained in CalEEMod for San Luis Obispo County.

<sup>4</sup> To be conservative, based on statewide annual average waste diversion rate of 60%. The County of San Luis Obispo 2006 waste diversion rate was 63% (Calrecycle 2024).

<sup>5</sup> Includes use of low-flow water fixtures and water-efficient irrigation systems, per current building code requirements.

<sup>6</sup> Calculated in CalEEMod based on loss of a total of approximately 266.5 acres, including 21.7 acres of coast live oak forest, 75.3 acres of coast live oak woodland, 35.0 acres of Burton Mesa chaparral, 125.0 acres of California perennial grassland, 3.2 acres of annual brome grassland, and 5.1 acres of Mediterranean California naturalized perennial grassland. Offsite improvements would impact approximately 0.05 acres of scrubland and 0.81 acres of grassland.



<sup>7</sup> Service population based on an estimated number of 4,809 residents and 273 employees (SWCA 2024).

<sup>8</sup> Refrigerant emissions included.

<sup>9</sup> Estimated emissions reflect total project-generated emissions, with the inclusion of the proposed commercial, educational, and hotel land use components. Hotel, commercial, and educational emissions are based on previously calculated emissions (County San Luis Obispo 2024). Commercial land uses noted in this table include educational land uses. Emissions include GHG mitigation measures, as noted in the DEIR prepared for this project (County of San Luis Obispo 2024).

As shown above, mitigated operational emissions would total approximately 14,192 MTCO<sub>2</sub>e per year and the project's GHG efficiency would be approximately 2.79 MTCO<sub>2</sub>e per service population per year, which is below the corresponding efficiency threshold of 2.9 MTCO<sub>2</sub>e per service population per year for ensuring consistency with SB 32 GHG-reduction requirements. With implementation of Mitigation Measures AQ/mm-3.1, AQ/mm-3.3, GHG/mm-1.1, and TR/mm-3.1, operation of the 2024 DRSP would have a less-than-significant impact on the environment related to GHG emissions. Therefore, impacts would remain *less than significant with mitigation*.

**GHG Impact 2:** The Draft EIR found that off-site improvements associated with the project could generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. With the incorporation of Mitigation Measure AQ/mm-3.1, impacts would be less than significant. The additional affordable housing units and required ADUs proposed by the 2024 DRSP would not conflict with the proposed mitigation. As a result, impacts would remain *less than significant with mitigation*. Refer to EIR Appendix L.

**GHG Impact 3:** The Draft EIR found that the project would potentially conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. As discussed above, implementation of Mitigation Measures AQ/mm-3.1, AQ/mm-3.3, GHG/mm-1.1, and TR/mm-3.1 would reduce potential impacts related to operational GHG emissions from the proposed project. However, the project would generate VMT in a manner that would be inconsistent with SLOCOG's 2019 RTP/SCS and the effectiveness of the identified mitigation to reduce this impact below applicable thresholds is not certain. Therefore, the Draft EIR concluded that even with implementation of identified mitigation, potential impacts would be significant and unavoidable. The additional affordable housing units and required ADUs proposed by the 2024 DRSP would be consistent with the proposed mitigation and would not substantially increase this impact. As a result, impacts would remain *significant and unavoidable*.

**GHG Impact 4:** The Draft EIR found that off-site improvements could conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. However, based on required compliance with existing regulations, impacts would be less than significant. The additional affordable housing units and required ADUs proposed by the 2024 DRSP would be required to comply with the same regulations identified in the Draft EIR. As a result, impacts would remain *less than significant*.

**GHG Impact 5:** The Draft EIR found that the project would result in a cumulatively considerable impact to greenhouse gas emissions. Even with the incorporation of Mitigation Measure TR/mm-3.1, impacts would be significant and unavoidable. The additional affordable housing units and required ADUs proposed by the 2024 DRSP would be consistent with the proposed mitigation and would not substantially increase this impact. As a result, impacts would remain *significant and unavoidable*.

### **11.3.4 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. However, no feasible mitigation measures were identified to reduce this impact. Therefore, this impact was considered to be significant and unavoidable. Table 11-4 shows the estimated population generation of the project presented in the Draft EIR.

**Table 11-4. Project Residential Population Generation (2021 DRSP)**

Land Use Type	Number of Dwelling Units	Nipomo Average Household Size <sup>1</sup>	Estimated Population Generated
Single-Family	831		2,626
Multi-Family	458	3.16	1,448
Accessory Dwelling Units	152		481
<b>Total</b>	<b>1,441</b>	<b>--</b>	<b>4,555</b>

<sup>1</sup> Source: U.S. Census Bureau (2019)

As demonstrated above, based on an average household size of 3.16, the Draft EIR estimated that the project would have a total population of 4,555. Note that the 152 potential ADU units are included in this estimate. Table 11-5 shows the estimated population of the project including the revisions proposed by the 2024 DRSP.

**Table 11-5. Project Residential Population Generation (2024 DRSP)**

Land Use Type	Number of Dwelling Units	Nipomo Average Household Size <sup>1</sup>	Estimated Population Generated
Single-Family	831		2,626
Multi-Family	539	3.16	1,703
Accessory Dwelling Units	152		480
<b>Total</b>	<b>1,522</b>	<b>--</b>	<b>4,810</b>

<sup>1</sup> Source: U.S. Census Bureau (2019)

As demonstrated above, based on an average household size of 3.16, the additional housing units proposed by the 2024 DRSP would result in a total population of 4,810. This population increase of 255 represents an increase of 6% from the estimates in the Draft EIR. While impacts from population growth would not be reduced, the revisions proposed by the 2024 DRSP would not result in a substantially increased impact, as documented with the substantial information included in EIR Appendix L. Therefore, impacts would remain *significant and unavoidable*.

Furthermore, the total population presented in the Draft EIR was conservatively estimated. Several sources show that a more accurate household size estimate for ADUs is 1.5. This is based on *Jumpstarting the Market for Accessory Dwelling Units: Lessons Learned From Portland, Seattle and Vancouver* by the San Francisco Chapter of the Urban Land Institute, which states that 57% of ADUs have one occupant and 36% of ADUs have two occupants. Additionally, *Implementing the Backyard Revolution: Perspectives of California’s ADU Owners* by UC Berkeley Center for Community Innovation, states that 93% of ADUs consisted of only one to two persons (Urban Land Institute no date [n.d.]; UC Berkeley 2021). An article by the ADU Academy states that detached ADUs have a mean household size of 1.39 persons in Portland, Oregon (ADU Academy 2014). Based on an average household size of 1.5, the estimated population for the assumed 152 ADUs in the EIR would be 228, for a reduction of 253 people compared to the Draft EIR. When including this reduction in the estimates for the

2024 DRSP, the total population would be reduced to 4,557, only 2 people larger than what was estimated in the Draft EIR.

**PH Impact 2:** The DEIR found that off-site improvements associated with the project would not result in substantial unplanned population growth. The 2024 DRSP does not propose any revisions that would alter the off-site improvements associated with the project. As a result, impacts would remain *less than significant*.

**PH Impacts 3 and 4:** The DEIR found that the project, and off-site improvements associated with the project would not displace existing people or housing. The revisions included in the 2024 DRSP would not result in any changes to the environmental setting of the project site, the land use types proposed by the project, or the boundaries of the project. Further, the 2024 DRSP does not propose any revisions that would alter the off-site improvements associated with the project. As a result, impacts would remain *less than significant*.

**PH Impact 5:** The Draft EIR found that the project would result in cumulatively considerable impacts related to population growth. As discussed above, the 2024 DRSP would not result in any additional impacts, nor would it substantially increase the existing impacts found by the Draft EIR. As a result, cumulative impacts related to Population & Housing would continue to be *significant and unavoidable*.

### **11.3.5 Transportation**

**TR Impacts 1 and 2:** The Draft EIR found that the project, and off-site improvements associated with the project could conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. However, it was determined that payments to the South County Traffic Impact Fee program for Fee Area 1 and compliance with existing public improvements standards, County ordinances, and applicable regulations would ensure that the Project would be developed consistent with applicable programs, plans, ordinances, or policies, and impacts were found to be less than significant. The additional affordable housing units and required ADUs proposed by the 2024 DRSP would comply with the same regulations identified in the Draft EIR and would continue to be subject to the same fee programs. Further, the 2024 DRSP does not propose any revisions that would alter the off-site improvements associated with the project. As a result, impacts would remain *less than significant*.

**TR Impacts 3 through 9:** 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 such, the Draft EIR incorporated Mitigation Measure TR/mm-3.1. However, even with mitigation, the Draft EIR found that VMT impacts of the DRSP would remain significant and unavoidable with mitigation. The revisions proposed in the 2024 DRSP would not change the Draft EIR's impact determination, as discussed below.

The Draft EIR's analysis was based on a Transportation Impact Study (TIS) and a VMT Analysis prepared by CCTC. CCTC prepared an updated Transportation Impact Study TIS to evaluate potential transportation-related impacts of buildout of the 2024 DRSP, compared to the original impacts evaluated in the Draft EIR.

Table 11-6 displays the net new weekday daily vehicle trips, net new weekday AM peak hour trips, net new weekday PM peak hours trips, net new Sunday vehicle trips, and net new Sunday midday peak hour trips for both the 2021 DRSP and the 2024 DRSP.

**Table 11-6. DRSP Trip Generation Comparison**

Source	Weekday Daily	AM Peak Hour	PM Peak Hour	Sunday Daily	Sunday Midday
2021 DRSP <sup>1</sup>	17,892	1,156	1,379	12,930	1,201
<b>2024 DRSP<sup>2</sup></b>	<b>17,621</b>	<b>1,212</b>	<b>1,416</b>	<b>12,724</b>	<b>1,233</b>
Change	-271	+56	+37	-206	+32

<sup>1</sup> Source: Transportation Impact Study, CCTC (2021)

<sup>2</sup> Source: Transportation Impact Study Addendum, CCTC (2024)

As demonstrated above, the 2024 DRSP produces fewer daily and weekday PM peak hour trips and slightly more weekday AM and Sunday midday PM peak hour trips compared to the 2021 DRSP. The 2024 DRSP trip generation would not change findings of the 2021 TIS. The revisions proposed by the 2024 DRSP would produce lower residential VMT per capita than what was evaluated in the 2021 TIS. Thus, the 2024 DRSP would not change the findings or recommendations in the Draft EIR. As such, TR Impacts 3 and 9 would remain *significant and unavoidable*, and TR Impacts 4 through 8 would remain *less than significant*.

### 11.3.6 Utility Service Systems

**USS Impacts 1 through 10:** The Draft EIR found that the project would have significant but mitigable impacts to Utility Service Systems. As a result, the Draft EIR incorporated USS/mm-3.1. The revisions proposed in the 2024 DRSP would not change the Draft EIR’s impact determinations, as discussed below.

The analysis in the Draft EIR was based on a Water Supply Assessment (WSA) prepared by Richard G. Sweet and the RRM Design Group (RMM), and a Water and Wastewater Evaluation prepared by MKN. As such, the project applicant retained RRM to prepare an updated WSA to evaluate the potential utility service system related impacts of the buildout of the 2024 DRSP, compared to the original impacts evaluated in the Draft EIR.

#### Water Supply

Table 11-7 compares the water demand for 2021 DRSP to the 2024 DRSP in acre-feet per year.

**Table 11-7. DRSP Water Demand (af/yr)**

Source	Residential	Commercial	Public	Total
2021 DRSP	269.98	44.04	36.9	350.92
<b>2024 DRSP</b>	<b>302.25</b>	<b>43.36</b>	<b>29.48</b>	<b>376.11</b>
Change	32.27	-0.68	-7.42	25.19

As demonstrated above, the 2024 DRSP would have an increased water demand compared to the 2021 DRSP. It should be noted that the 2024 analysis assumed that all 152 ADUs would be constructed, rather than just the 100 required by the 2024 DRSP. The Draft EIR did not account for ADU development in regard to water demand. Overall, the additional affordable housing units and required AUDs would only increase the water demand by approximately 7%. This modest increase would still leave the NCSD with a water surplus of 415 AFY, as discussed below.

The Draft EIR found that the Nipomo Community Services District (NCSD) would have sufficient supplies to meet the water demands of the project. According to the updated WSA, the NCSD’s total

water supply consists of 3,0000 af/yr from the Nipomo Supplemental Water Project (NSWP), and a minimum of 1,013 af/yr from groundwater, for a total supply of 4,013 af/yr. According to the *Nipomo Community Services District Urban Water Management Plan (UWMP)*, the total water demand in 2045 for the NCS D is 3,573 af, which accounts for the water demand of the original DRSP. When including the additional demand of 25 af/yr from 2024 DRSP, the NCS D would still have a surplus of 415 af/yr. Therefore, the NCS D would have sufficient water supply to serve the additional demands of the 2024 DRSP and the revisions proposed by the 2024 DRSP would not conflict with Mitigation Measure USS/mm-3.1. As such, impacts related to water supply would remain *less than significant with mitigation*.

## Wastewater

Table 11-8 compares the wastewater generation for the 2021 DRSP to the 2024 DRSP in acre-feet per year.

**Table 11-8. DRSP Wastewater Generation (af/yr)**

Source	Residential	Commercial	Public	Total
2021 DRSP	197.97	36.27	5.5	239.80
<b>2024 DRSP</b>	<b>227.81</b>	<b>35.72</b>	<b>2.57</b>	<b>266.95</b>
Change	29.84	-0.55	-2.93	27.15

As demonstrated above, the 2024 DRSP would have an increased wastewater generation compared to the 2021 DRSP. It should be noted that the 2024 analysis assumed that all 152 ADUs would be constructed, rather than just the 100 required by the 2024 DRSP. Overall, the additional affordable housing units and required AUDs would increase the wastewater generation by approximately 11%. The NCS D would still have adequate capacity to account for this moderate increase.

According to the Draft EIR, the project includes off-site NCS D wastewater system improvements, including the installation of a third screw centrifugal pump, which would provide adequate capacity to treat the increase of peak hour wastewater flows. Other proposed off-site NCS D wastewater improvements would be conducted to further improve existing sewer main capacities and Southland WWTF processes. Based on the proposed off-site NCS D wastewater system improvements included in the proposed project, NCS D would have adequate capacity to treat future wastewater flows from the proposed project and projected growth within the NCS D service area; therefore, impacts were found to be less than significant. These improvements are still incorporated in the 2024 DRSP, and the NCS D would continue to have adequate capacity to treat the project’s additional wastewater flows. As such, impacts would remain *less than significant*.

## 11.4 NON-ISSUE AREAS

The following discussion summarizes the issue areas that would not be affected by the proposed revisions to the DRSP. There is no evidence to suggest that any of the impact determinations for the following areas would change as a result of the 2024 DRSP.

### 11.4.1 Aesthetics

The Draft EIR found that the project would have significant but mitigable impacts related to Aesthetics and implements Mitigation Measures (MM) AES/mm-3.1, AES/mm-3.2, and AES/mm-7.1. The

additional affordable housing units and required ADUs proposed by the 2024 DRSP would be consistent with the proposed mitigation. Further, the additional units would be consistent with the visual characteristics of the residential units previously analyzed in the Draft EIR. As such, impacts related to Aesthetics would be unchanged. Therefore, the revisions to the DRSP do not alter the assessments or conclusions related to Aesthetics included in the Draft EIR, and impacts would remain *less than significant with mitigation*.

### **11.4.2 Agriculture and Forestry Resources**

The Draft EIR found that the project would have significant but mitigable impacts related to Agriculture & Forestry Resources and incorporates AQ/mm-3.2 and AQ/mm-3.3. The additional affordable housing units and required ADUs proposed by the 2024 DRSP would be consistent with the proposed mitigation. The revisions included in the 2024 DRSP would not result in any changes to the environmental setting of the project site, the land use types proposed by the project, or the boundaries of the project. As such, the impacts related to Agriculture & Forestry Resources would be unchanged. Therefore, the revisions included in the 2024 DRSP do not alter the assessments or conclusions related to Agriculture & Forestry Resource included in the Draft EIR, and impacts would remain *less than significant with mitigation*.

### **11.4.3 Cultural Resources**

The Draft EIR found that the project would have significant but mitigable impacts related to Cultural Resources and implements CR/mm-1.1, CR/mm-2.1, CR/mm-2.2, CR/mm-2.3, CR/mm-2.4, and CR/mm-3.1. The additional affordable housing units and required ADUs proposed by the 2024 DRSP would be consistent with the proposed mitigation. The revisions included in the 2024 DRSP would not result in any changes to the environmental setting of the project site, the land use types proposed by the project, or the boundaries of the project. As such, impacts related to Cultural Resources would be unchanged. Therefore, the revisions included in the 2024 DRSP do not alter the assessments or conclusions related to Cultural Resources included in the Draft EIR, and impacts would remain *less than significant with mitigation*.

### **11.4.4 Energy**

The Draft EIR found that the project would have significant but mitigable impacts related to Energy and incorporates AQ/mm-3.1, AQ/mm-3.3, and TR/mm-3.1. The additional affordable housing units and required ADUs proposed by the 2024 DRSP would be consistent with the proposed mitigation. As the additional units would be subject to the same applicable energy efficiency standards identified in the Draft EIR, adoption of the 2024 DRSP would not result in wasteful, inefficient, or unnecessary consumption of energy resources. Further, the impacts of the 100 ADUs required by the 2024 DRSP were already accounted for, as the Energy analysis within the Draft EIR assumed that all 152 ADUs would be built. As such, impacts related to Energy would be unchanged. Therefore, the revisions to the DRSP do not alter the assessments or conclusions related to Energy included in the Draft EIR, and impacts would remain *less than significant with mitigation*.

### **11.4.5 Geology and Soils**

The Draft EIR found that the project would have significant but mitigable impacts related to Geology & Soils and implements GEO/mm-1.1, GEO/mm-5.1, GEO/mm-5.2, and GEO/mm-5.3, GEO/mm-8.1, GEO/mm-8.2, and GEO/mm-8.3. The additional affordable housing units and required ADUs proposed by the 2024 DRSP would be consistent with the proposed mitigation. The revisions included in the 2024 DRSP would not result in any changes to the environmental setting of the project site, the land use types proposed by the project, or the boundaries of the project. As such, the impacts related to Geology & Soils would be unchanged. Therefore, the revisions included in the 2024 DRSP do not alter the assessments or

conclusions related to Geology & Soils included in the Draft EIR, and impacts would remain *less than significant with mitigation*.

#### **11.4.6 Hydrology and Water Quality**

The Draft EIR found that the project would have significant but mitigable impacts related to Hydrology & Water Quality, and incorporates BIO/mm-17.1 through BIO/mm-17.3. The additional affordable housing units and required ADUs proposed by the 2024 DRSP would be consistent with the proposed mitigation. As the additional units would be subject to the same applicable building standards and regulations identified in the Draft EIR, adoption of the 2024 DRSP would not result in any issues related to water quality standards, waste discharge, or drainage. Further, the revisions included in the 2024 DRSP would not result in any changes to the environmental setting of the project site, the land use types proposed by the project, or the boundaries of the project. As such, impacts related to Hydrology & Water Quality would be unchanged. Therefore, the revisions to the DRSP do not alter the assessments or conclusions related to Energy included in the Draft EIR, and impacts would remain *less than significant with mitigation*. Refer to *Section 11.3.6 Utility Service Systems* for a discussion of impacts related to additional water demand and wastewater generation.

#### **11.4.7 Hazards and Hazardous Materials**

The Draft EIR found that the project would have significant but mitigable impacts related to Hazards & Hazardous Materials, and implements HAZ/mm-7.1, as well as AQ/mm-7.1 and BIO/mm-16.1 through BIO/mm-16.3. The additional affordable housing units and required ADUs proposed by the 2024 DRSP would be consistent with the proposed mitigation. The revisions included in the 2024 DRSP would not result in any changes to the environmental setting of the project site, the land use types proposed by the project, or the boundaries of the project. As such, impacts related to Hazards & Hazardous Materials would be unchanged. Therefore, the revisions included in the 2024 DRSP do not alter the assessments or conclusions related to Hazards & Hazardous Materials included in the Draft EIR, and impacts would remain *less than significant with mitigation*.

#### **11.4.8 Land Use and Planning**

The Draft EIR found that the project would have significant and unavoidable impacts related to Land Use & Planning despite the incorporation of AES/mm-3.1, AES/mm-3.2, AES/mm-7.1, AQ/mm-3.1 through AQ/mm-3.3, BIO/mm-2.1 through BIO/mm-2.3, BIO/mm-4.1, BIO/mm-15.1, BIO/mm-16.1, BIO/mm-18.1 through BIO/mm-18.4, BIO/mm-19.1, GHG/mm-1.1, PS/mm-1.1, TR/mm-2.1, and TR/mm-3.1. The additional affordable housing units and required ADUs proposed by the 2024 DRSP would be consistent with the proposed mitigation. The revisions included in the 2024 DRSP would not result in any changes to the environmental setting of the project site, the land use types proposed by the project, or the boundaries of the project. As such, impacts related to Land Use & Planning would be unchanged. Therefore, the revisions included in the 2024 DRSP do not alter the assessments or conclusions related to Land Use & Planning included in the Draft EIR, and impacts would remain *significant and unavoidable*. Refer to *Section 11.3.4 Population and Housing* for a discussion of impacts related to the increased population of the project.

#### **11.4.9 Mineral Resources**

The Draft EIR found that the project would have less than significant impacts related to Mineral Resources. The revisions included in the 2024 DRSP would not result in any changes to the environmental setting of the project site, the land use types proposed by the project, or the boundaries of the project. As such, the impacts related to Mineral Resources would be unchanged. Therefore, the

revisions included in the 2024 DRSP do not alter the assessments or conclusions related to Mineral Resources included in the Draft EIR, and impacts would remain *less than significant*.

#### **11.4.10 Noise**

The Draft EIR found that the project would have significant but mitigable impacts related to Noise and implements N/mm-1.1 and N/mm-1.2. The additional affordable housing units and required ADUs proposed by the 2024 DRSP would be consistent with the proposed mitigation. Construction and operation of the additional units would be subject to the same applicable noise standards identified in the Draft EIR. Further, the impacts of the 100 ADUs required by the 2024 DRSP were already accounted for, as the Noise analysis within the Draft EIR assumed that all 152 ADUs would be built. As such, impacts related to Noise would be unchanged. Therefore, the revisions included in the 2024 DRSP do not alter the assessments or conclusions related to Noise included in the Draft EIR, and impacts would remain *less than significant with mitigation*.

#### **11.4.11 Public Services**

The Draft EIR found that the project would have significant but mitigable impacts related to Public Services and implements PS/mm-1.1. The additional affordable housing units and required ADUs proposed by the 2024 DRSP would be consistent with the proposed mitigation. The project would continue to be subject to the same County Public Facilities Fees identified in the Draft EIR. Adding additional housing units would proportionally increase these fees. As such, impacts related to Public Services would be unchanged. Therefore, the revisions included in the 2024 DRSP do not alter the assessments or conclusions related to Public Services included in the Draft EIR, and impacts would remain *less than significant with mitigation*.

#### **11.4.12 Recreation**

The Draft EIR found that the project would have significant but mitigable impacts related to Recreation and incorporates AES/mm-3.1 AES/mm-3.2, AQ/mm-3.1 AQ/mm-3.2, AQ/mm-7.1, BIO/mm-1.1 through BIO/mm-1.6, BIO/mm-2.1 through BIO/mm-2.3, BIO/mm-3.1, BIO/mm-4.1, BIO/mm-4.2, BIO/mm-5.1, BIO/mm-6.1, BIO/mm-7.1, BIO/mm-8.1, BIO/mm-9.1, BIO/mm-14.1, BIO/mm-15.1, BIO/mm-18.1 through BIO/mm-18.4, CR/mm-1.1 through CR/mm-1.4, GEO/mm-1.1, GEO/mm-5.1 through GEO/mm-5.3, GEO/mm-8.1 through GEO/mm-8.3, N/mm-1.1, N/mm-1.2, USS/mm-3.1, and WF/mm-3.1. The additional affordable housing units and required ADUs proposed by the 2024 DRSP would be consistent with the proposed mitigation. The revisions included in the 2024 DRSP would not result in any changes to the environmental setting of the project site, the land use types proposed by the project, or the boundaries of the project. Further, the 2024 DRSP would still include the development of park space, which would reduce the demand on existing recreational facilities within the county and the community by providing new local recreational facilities, as discussed in the Draft EIR. As such, impacts related to Recreation would be unchanged. Therefore, the revisions included in the 2024 DRSP do not alter the assessments or conclusions related to Recreation included in the Draft EIR, and impacts would remain *less than significant with mitigation*.

#### **11.4.13 Tribal and Cultural Resources**

The Draft EIR found that the project would have significant but mitigable impacts related to Tribal & Cultural Resources and implements TCR/mm-1.1 and TCR/mm-1.2, as well as CR/mm-2.1 through CR/mm-2.4. The additional affordable housing units and required ADUs proposed by the 2024 DRSP would be consistent with the proposed mitigation. The revisions included in the 2024 DRSP would not result in any changes to the environmental setting of the project site, the land use types proposed by the



project, or the boundaries of the project. As such, impacts related to Tribal & Cultural Resources would be unchanged. Therefore, the revisions included in the 2024 DRSP do not alter the assessments or conclusions related to Tribal & Cultural Resources included in the Draft EIR, and impacts would remain *less than significant with mitigation*.

#### **11.4.14 Wildfire**

The Draft EIR found that the project would have significant but mitigable impacts related to Wildfire and implements WF/mm-1.1 and WF/mm-3.1. The additional affordable housing units and required ADUs proposed by the 2024 DRSP would be consistent with the proposed mitigation. The revisions included in the 2024 DRSP would not result in any changes to the environmental setting of the project site, the land use types proposed by the project, or the boundaries of the project. As such, the impacts related to Wildfire would be unchanged. Therefore, the revisions included in the 2024 DRSP do not alter the assessments or conclusions related to Wildfire included in the Draft EIR, and impacts would remain *less than significant with mitigation*.

### **11.5 CONCLUSION**

The 2024 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 2024 DRSP will not result in a new significant impact or a substantial increase in the severity of an impact identified in the Draft 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 Draft 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).

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