Addendum #1 to the 2024 Final Environmental Impact Report for the Dana Reserve Specific Plan SCH NO. 2021060558

JULY 2025

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County of San Luis Obispo

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DANA RESERVE SPECIFIC PLAN 2025
DRAFT ADDENDUM #1

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CHAPTER 1. INTRODUCTION

As a result of a settlement agreement, Dana Reserve, LLC and NKT Development, LLC, collectively referred to as the project applicant, has submitted a request (LRP2025-00004) to amend and modify certain provisions of the *Dana Reserve Specific Plan* (2024 DRSP).

On April 24, 2024, the County of San Luis Obispo (County) adopted the *Dana Reserve Specific Plan Final Environmental Impact Report* (2024 Final EIR; SWCA Environmental Consultants [SWCA] 2024) for the Dana Reserve Specific Plan Project (project) and approved a Conditional Use Permit (CUP) for Oak Tree Removal and Grading/Impervious Surfaces, Vesting Tentative Tract Map (VTTM) 3159, and a Development Agreement. The project includes 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 2024 Final EIR was litigated by the Nipomo Action Committee and the San Luis Obispo Chapter of the California Native Plant Society (CNPS) and a settlement agreement was reached effective April 12, 2025. As part of the settlement agreement, the Applicant agreed to modify the project by reducing housing density in several neighborhoods, increasing certain setbacks, preserving additional open space, and relocating certain features of the project. The 2025 DRSP reflects these updates.

The areas primarily affected by the requested amendment include Neighborhoods 1, 2, 3, 7, 9, 10A, and 10B. The DRSP is located within the unincorporated community of Nipomo and consists of three adjacent parcels totaling approximately 288 acres, including Assessor's Parcel Numbers (APNs) 091-301-030, 091-301-031, and 091-301-073. The project site is located approximately 7 miles east of the Pacific Ocean and 7 miles southeast of the city of Arroyo Grande, within the southwestern portion of unincorporated San Luis Obispo County, California.

1.1 PURPOSE OF DOCUMENT

Pursuant to Section 21166 of the California Environmental Quality Act (CEQA) and Section 15162(a) of the State CEQA Guidelines, when a lead agency has certified an EIR for a project, a subsequent EIR does not need to be prepared for the project unless the lead agency determines that one or more of the following conditions are met:

1. Substantial changes are proposed in the project which would require major revisions of the previous EIR or negative declaration 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 would require major revisions of the previous EIR or Negative Declaration 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 or the Negative Declaration was adopted, shows any of the following:
    a. The project would have one or more significant effects not discussed in the previous EIR or negative declaration;
    b. Significant effects previously examined would 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.

Preparation of an Addendum to an EIR is appropriate when none of the conditions specified in Section 15162 are present and some minor technical changes to the previously certified EIR are necessary.

1.2 BASIS FOR ADDENDUM

In accordance with Section 15164 of the State CEQA Guidelines, the County has determined that this Addendum to the certified EIR is necessary to document changes that have occurred in the project description since the EIR was originally certified. The changes proposed are relatively minor in nature and, as documented in Chapter 3, Impact Analysis, of this Addendum, 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 previous EIR was certified has been identified. The County has reviewed and considered the information contained in this Addendum and finds that the preparation of subsequent CEQA analysis that would require public circulation is not necessary.

This Addendum does not require circulation because it does not provide significant new information that changes the certified 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 Addendum with the certified EIR as part of the discretionary review of the proposed amendment to the Specific Plan.

This Addendum and the previously certified 2024 Final EIR together make up the environmental documentation for the proposed project. The 2024 Final EIR can be found on the County Planning and Building Department website, at Final Environmental Impact Report, or copies may be viewed at the Planning and Building Department offices at 976 Osos Street, Room 200, San Luis Obispo.

CHAPTER 2. PROJECT AND REQUESTED AMENDMENT

2.1 SUMMARY OF THE APPROVED DANA RESERVE SPECIFIC PLAN

A specific plan is a planning tool that allows a county/community to provide a framework and vision for future development of a defined area (Government Code Sections 65450–65457). The 2024 DRSP provides a land use and conceptual development plan with associated goals, policies, and development standards to guide future development within the proposed Specific Plan Area, which is comprised of the 288-acre Dana Reserve. The 2024 DRSP guides development of the Dana Reserve by defining land uses and development standards, circulation, parks and trails, and infrastructure for the future proposed residential, commercial, and open space uses. The 2024 DRSP also provides a phasing/implementation

plan and describes the public facility financing mechanisms available for the ongoing maintenance of public and private improvements required for the DRSP.

The 2024 DRSP is a primarily residential project with a majority of the Specific Plan Area designated for residential uses, which accommodates up to 1,370 single- and multi-family residential units (including Accessory Dwelling Units to be constructed with original neighborhood construction). However, it also identifies a mix of land uses within the Specific Plan Area to serve the new neighborhoods and surrounding community. The 2024 DRSP allows for the future phased development of residential uses, village and flex commercial uses (including a hotel, educational/training facilities, and retail/light industrial uses), open space, trails, and a public neighborhood park within the approximately 288-acre Specific Plan Area (Table 1). Major components of the 2024 DRSP include:

- Land use and development standards for residential, commercial, and open space/recreational uses;
- Site and building design guidelines;
- Goals supporting a variety of housing types to allow a range of opportunities for home ownership or rental options;
- Establishment of north-to-south roadway connections through the Specific Plan Area to better connect Tefft Street and Pomeroy Road to Willow Road;
- Implementation of an interconnected network of walking, bicycling, and equestrian trails and facilities; and
- The generation of new employment opportunities and provision of access to day-to-day goods and services through development of a range of commercial uses.

Table 1. 2024 DRSP Overview

Land Use Zones	Acres[1]	Potential Units[1]	Potential Floor Area (square feet)
Residential Single-Family	149.5	831	
Residential Multi-Family	23.5	458	
Residential Rural (Existing)	10.0	N/A[2]	
Recreation/Public Park	11.0[3]		
Village and Flex Commercial[4]	22.3		110,000-203,000
Open Space, Trails, Basins	49.8		
Roads	21.9		
Total	**288**	**1,289**	**110,000–203,000**

[1] All acreage and potential units can be adjusted up to 10% to address site specific constraints and more suitable site design, subject to County review.

[2] The Specific Plan Area includes two parcels between Cherokee Place and Willow Road (Assessor's Parcel Numbers [APNs] 091-301-030 and 091-301-031) that are currently designated Residential Rural. The DRSP does not propose to change the land use designation of these parcels or develop additional residential, commercial, or recreational uses within these parcels; they are included in the DRSP to provide a transit center and roadway connections for Collectors A and B from Cherokee Place to Willow Road. These roadway and roadway-related improvements are the only development proposed on these parcels; therefore, the identification of additional potential units is not applicable for these parcels.

[3] Minimum requirement.

[4] Proposed Commercial uses include a 60,000-square-foot hotel and a 30,000-square-foot educational/training facility.

2.2 PROPOSED REVISIONS TO THE DANA RESERVE SPECIFIC PLAN

Table 2 summarizes the changes in residential and open space area, density, and units and from the 2024 DRSP to the proposed 2025 DRSP. The overall residential unit count would decrease by 128 units from 1,370 to 1,242 units in the 2025 DRSP. Exact unit changes per neighborhood are addressed in *Section 2.2.1* below. The construction of one hundred previously mandated accessible dwelling units (ADUs) would be eliminated from the project[1] and the number of affordable housing units would decrease from 156 to 78 units. In the 2025 DRSP approximately 2,949 oaks would be removed, 195 fewer than accounted for in the 2024 DRSP; approximately 1,979 oaks would be retained, 195 more than the 2024 DRSP, and approximately 269 oaks would be avoided.

Wastewater generation, water demand, and student generation calculations were also updated to reflect the new unit numbers in the 2025 DRSP. Water demand would decrease from 376.11 acre-feet per year (AFY) in the 2024 DRSP to 350.64 AFY in the 2025 DRSP. The wastewater generation would also decrease from 266.95 AFY in the 2024 DRSP to 248.87 AYF in the 2025 DRSP with peak flows at 622.18 AYF. Student (K-12) generation calculations were updated to reflect the 2025 DRSP and would decrease student demand from the 1,233 students generated from the 2024 DRSP to 1,118 students for the 2025 DRSP.

Table 2: Land Use Change Comparison (Table 2.1 of the DRSP)

Land Use	Acres		Density Range (dwelling units per acre)		Potential Units		Potential Square Feet[2]
	2024	**2025**	**2024**	**2025**	**2024**	**2025**	
RESIDENTIAL							
Residential Single-Family-1 (DR-SF1)	130.8	128.1	4-7	4-7	707	695	
Residential Single-Family-2 (DR-SF2)	15.3	16.2	11-13	7.5-13	124	124	
Residential Multi-Family (DR-MF)	25.7	22.2	18-24	14-26	539	423	
Recreation (DR-REC) • *Neighborhood Park (4.8 ac)* • *Equestrian Staging (1 ac)* • *Daycare (0.5 ac)*	6.3[5]						
Pocket Parks[3]	-						
Primary Roads	22						
Residential Rural (RR) – Existing[6]	10						
SUBTOTAL	**210.1**	**204.84**			**1,370**	**1,242**	

[1] Accessory dwelling units would still be allowed under the 2025 DRSP and state law; the revisions in the 2025 DRSP would only eliminate the requirement that they be built as a part of original project construction, as opposed to in the future per property owner preference.

COMMERCIAL AND NON-RESIDENTIAL						
Village and Flex Commercial						113k sf
Visitor Serving / Hotel		22.3[1]				60k sf
Education						30k sf
Internal Neighborhood Roads[3]		-				
Park and Ride[4]		-				
	SUBTOTAL	**22.3**				**203k sf**
OPEN SPACE/RECREATION						
Open Space (DR-OS) • Open Space • Trails • Basins		55.6[5]	60.86[5]			
	SUBTOTAL	**55.6**	**60.86**			
TOTAL		**288.0**		**1,370**	**1,242**	**110-203k sf**

Notes:

[1] All acreage and potential units can be adjusted up to 10% to address site specific constraints and more suitable site design, subject to County review.

[2] k indicates thousand.

[3] Internal Neighborhood Roads and Pocket Park acreage located within Residential Single-Family land use acreage calculation.

[4] Park and Ride acreage located within public Collector Roads.

[5] Minimum Requirement.

[6] Includes approximately 2-acre fire station and a potential 1-acre public safety facility.

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2.2.1 Neighborhoods Changes

2.2.1.1 Neighborhood 1

Neighborhood 1 had a projected unit count of 173 units in the 2024 Final EIR. The 2025 DRSP proposes 193 units in Neighborhood 1, an increase of 20 Residential Multi-Family (DR-MF) category units. The increase in units in Neighborhood 1 is requested to offset some of the loss of Residential Multi-Family (DR-MF) units in Neighborhood 2.

2.2.1.2 Neighborhood 2

Neighborhood 2 had a projected unit count of 210 units in the 2024 Final EIR. The 2025 DRSP proposes 152 units in Neighborhood 2, reflecting a decrease of 58 Residential Multi-Family (DR-MF) category units, for a total reduction of 38 multi-family units in Neighborhoods 1 and 2.

2.2.1.3 Neighborhood 3

Neighborhood 3 had a density for the Residential Single-Family-2 (DR-SF2) category units of 11-13 du/ac in the 2024 DRSP and is proposed to have a unit density of 7.5-13 du/ac in the 2025 DRSP. Also, two lots deep in Neighborhood 3, the property line setback would be reduced to 50 feet to accommodate larger lots and an additional special height restriction on the southern property line of the Residential Single-Family 2 (DR-SF2) category units of 22 feet tall and 1-story maximum building height.

2.2.1.4 Neighborhood 7

Neighborhood 7 had a projected unit count of 157 units in the 2024 DRSP. The 2025 DRSP proposes 149 units in Neighborhood 7. Neighborhood 7 would have a decrease in Residential Single-Family-1 (DR-SF1) units due to the protection of additional oak forest/oak woodland habitat and oak trees. The area unencumbered by the reduction of lots will be used for a native plant garden. This neighborhood is also more specifically proposed to include a monument sign, which is allowed under the 2024 DRSP.

2.2.1.5 Neighborhood 9

Neighborhood 9 had a projected unit count of 198 units in the 2024 DRSP. The 2025 DRSP proposes 194 units in Neighborhood 9. Neighborhood 9 would have a decrease in Residential Single-Family-1 (DR-SF1) units in order to increase the setback between the existing neighboring homes to the west of Hetrick Avenue and Neighborhood 9 on the western edge of the project site. New homes in Neighborhood 9 will be setback an additional 100 feet from Hetrick Avenue, resulting in a 130-foot setback from the eastern edge of the road to the rear yard fences of the new homes. This increased setback would create a 260-foot buffer between new homes and existing neighbors.

2.2.1.6 Neighborhood 10A

Neighborhood 10A had a projected unit count of 84 deed-restricted affordable units in the 2024 DRSP. The 2025 DRSP proposes to remove Neighborhood 10A completely, reflecting a decrease of 84 Residential Multi-Family (DR-MF) category units. Neighborhood 10A would be removed to allow for the preservation of oak forest habitat and oak trees. This area is redesignated as open space land use in the 2025 DRSP.

2.2.1.7 Neighborhood 10B (10)

Neighborhood 10B had a projected unit count of 72 units in the 2024 DRSP. The 2025 DRSP proposes 78 units in Neighborhood 10B, which would be renamed as Neighborhood 10. Neighborhood 10 would have an increase in units because it would accommodate a portion of the housing lost in the elimination of Neighborhood 10A. No change in the footprint of Neighborhood 10 is proposed.

2.2.2 Open Space

Open space across the project site would increase from 55.6 acres to 60.86 acres, an increase from 19.3% to 21.2% of the site. The recreation area would increase from approximately 6.3 acres to 6.34 acres. The pocket parks would slightly decrease in area from approximately 7.6-10 acres to 6.7-10 acres.

2.2.3 Other Minor Revisions

In addition to clean-up text, the following minor revisions to the 2024 DRSP are also included in the revised 2025 DRSP:

- Chapter 2: Land Use and Development Standards
  - Page 2-3: Table 2.1
    - Updated Table 2.1: Land Use Summary to show a decrease in unit counts for the Residential Single-Family-1 (DR-SF1) land use category in Neighborhoods 7 and 9.

  - Updated Table 2.1: Land Use Summary to show a change in density for the Residential Single-Family-2 (DR-SF2) category in Neighborhood 3 from 11-13 du/ac to 7.5-13 du/ac.
  - Updated Table 2.1: Land Use Summary to show an increase in unit counts for the Residential Multi-Family (DR-MF) category in Neighborhood 1.
  - Updated Table 2.1: Land Use Summary to show a reduction in unit counts for the Residential Multi-Family (DR-MF) category in Neighborhoods 2 and 10.
  - Updated Table 2.1: Land Use Summary to show an expansion in Open Space land use area adjacent to Neighborhoods 7 and 9.
  - Updated Table 2.1: Land Use Summary to remove Note 7 reflecting the elimination of 100 mandatory Accessory Dwelling Units.
- Page 2-8 - Section 2.2
  - Updated the Housing Development Neighborhood Totals on the Gross Site table to reflect an increase in Neighborhood 1 from 173 units to 193 units.
  - Updated the Housing Development Neighborhood Totals on the Gross Site table to reflect a decrease in Neighborhood 2 from 210 units to 152 units.
  - Updated the Housing Development Neighborhood Totals on the Gross Site table to reflect a decrease in Neighborhood 7 from 157 units to 149 units.
  - Updated the Housing Development Neighborhood Totals on the Gross Site table to reflect a decrease in Neighborhood 9 from 198 units to 194 units.
  - Updated the Housing Development Neighborhood Totals on the Gross Site table to reflect Neighborhood 10 (formerly Neighborhood 10B) has been revised to 78 units.
  - Updated the Housing Development Neighborhood Totals on the Gross Site table to reflect corresponding adjustments to the percentages of the gross site for each neighborhood.
- Page 2-9 – Residential Land Use Descriptions
  - Updated Residential Single-Family 2 (DR-SF2) Purpose to reflect lot size range from 3,300 sf to 3,999 to 3,300 sf to 4,499 sf and Character to reflect change from eleven to thirteen dwelling units per acre to seven and one half to thirteen dwelling units per acre.
- Page 2-10 – Residential Land Use Descriptions
  - Updated Residential Multi-Family (DR-MF) Character to reflect change from eighteen to twenty-four dwelling units per acre to fourteen to twenty-six dwelling units per acre.
- Page 2-12 – Table 2.2: Residential Single-Family Development Standards
  - Added Special Height Restrictions to the lots adjacent to the southern property line of the Residential Single-Family 2 (DR-SF2) category, two lots deep in Neighborhood 3.
  - Added Neighborhood 3 to the Special Height Restrictions row.
  - Updated the lot size range for the Residential Single-Family 2 (DR-SF2) category to reflect a change from 3,300 – 3,999 sf to 3,300 to 4,499 sf.
- Page 2-13 – Table 2.2: Residential Single-Family Development Standards
  - Updated Pocket Park Space acreages per neighborhood to reflect minor reductions in minimum ranges and change in Pocket Park Total acreage from 7.6 – 10 to 6.7 – 10 ac.
- Page 2-14 – Table 2.3: Residential Multi-Family Development Standards
  - Updated Residential Single-Family 2 (DR-SF2) allowable density range from 18-24 du/ac to 14-26 du/ac.
- Page 2-18 – Section 2.3.5

  - Updated the description of the Western DRSP Property Line Edge Condition at Neighborhood 9 to reflect the change in the width of the equestrian trail from 30 feet to 130 feet.
- Page 2-19 – Table 2.6: Residential Fencing Standards
  - Removed Fencing requirements for areas where Residential Multi-Family property is adjacent to Flex Commercial property to reflect the elimination of this condition.
- Page 2-20 – Specific Plan Application
  - Updated number of affordable units to reflect change from 156 to 78 units.
- Page 2-27 – Table 2.9: Commercial Fencing Standards
  - Removed Fencing requirements for areas where Residential Multi-Family property is adjacent to Flex Commercial property to reflect the elimination of this condition.

- Chapter 3: Conservation, Open Space, and Recreation
  - Page 3-1 – Table 3.1: Recreation and Open Space Land Use Summary
    - Updated Recreation and Open Space acreages and associated percentages of site.
  - Page 3-7 – Table 3.2: Required Parkland
    - Updated the required parkland to reflect changes in total homes.
- Chapter 5: Infrastructure and Phasing
  - Page 5-1 – Section 5.2
    - Updated water factor and demand calculations to reflect revised number of units and acreages.
  - Page 5-2 – Table 5.1: DRSP Water Use Factor and Demand
    - Updated water factor and demand calculations to reflect revised number of units and acreages.
  - Page 5-6 – Section 5.3
    - Updated wastewater generation calculations to reflect revised number of units and acreages.
  - Page 5-6 – Table 5.2: DRSP Wastewater Generation
    - Updated wastewater generation calculations to reflect revised number of units and acreages.
- Chapter 6: Public Service
  - Page 6-1 – Table 6.1: Existing LMUSD School Capacity (2023-2024)
    - Added years analyzed for school capacity.
  - Page 6-2 – Table 6.2: Student Generation by DRSP
    - Updated student generation calculations to reflect reduction in homes.
  - Page 6-2 – Table 6.3: Anticipated Student Generation Rate by DRSP Phasing
    - Updated student generation rates by phasing to reflect reduction in homes.
- Appendix B
  - Page B-2 – Phasing and Public Improvements Implementation Matrix
    - Updated matrix to reflect removal of Neighborhood 10A and align with the DRSP Final April 2024.
- Appendix C
  - Page C-1 – Mitigation Monitoring and Reporting Program

– Updated reference to the Final Environmental Impact Report SCH No. 2021060558, Chapter 7 Mitigation Monitoring and Reporting Program, dated April 2024 and the 2025 Addendum.

CHAPTER 3. IMPACT ANALYSIS

The following discussion details the effects of the revisions to the 2025 DRSP, as outlined above. All impacts from the Final EIR that have a significant impact and/or a potential change in impact based on the 2025 DRSP are discussed. In general, given that the project changes proposed in the 2025 DRSP reduce the extent of development and do not in any way increase development potential or the project's development footprint, all previously evaluated environmental impacts would be reduced under the proposed 2025 DRSP.

3.1 AESTHETICS

The 2024 Final EIR found that the project would have significant but mitigable impacts related to visual character of the site and its surroundings and incorporates AES/mm-3.1 through AES/mm-3.2, which requires screening zones and landscaping. Development resulting from the proposed 2025 DRSP would be consistent with the 2024 DRSP, which is primarily residential in nature. The additional open space and 128 less housing units proposed by the 2025 DRSP would slightly reduce impacts related to visual quality but not a significant amount and impacts would be similar as described in the 2024 Final EIR. Mitigation Measure AES/mm-3.1 through AES/mm-3.2 from the 2024 Final EIR would continue to apply to future development associated with the 2025 DRSP. Therefore, the 2025 DRSP does not alter the assessments or conclusions related to aesthetic impacts of the 2024 Final EIR, and impacts would remain *less than significant with mitigation.*

3.2 AGRICULTURE AND FORESTRY RESOURCES

The 2024 Final EIR found that the project would have significant but mitigable impacts related to fugitive dust emissions on nearby agricultural crops and incorporates AQ/mm-3.2 and AQ/mm-3.3, which require compliance with existing dust mitigation policies. It was determined that the 2024 DRSP would potentially involve changes that could result in conversion of farmland to non-agricultural use due to changes on the project site and offsite. The proposed changes to the 2024 DRSP would not impact the project site plan in a substantial way that would increase the project's impact on agricultural resources. The additional open space and 128 fewer housing units proposed by the 2025 DRSP would result in slightly reduced fugitive dust emissions and impacts would be similar to those described in the 2024 Final EIR. Mitigation Measure AQ/mm-3.2 and AQ/mm-3.3 from the 2024 Final EIR would apply to future development associated with the 2025 DRSP. Therefore, the 2025 DRSP does not alter the assessments or conclusions of the 2024 Final EIR related to agricultural and forestry resources, and impacts would remain *less than significant with mitigation.*

3.3 AIR QUALITY

The 2024 Final EIR found that the project would have significant and unavoidable impacts related to Air Quality despite the incorporation of AQ/mm-3.1 through AQ/mm-3.3, AQ/mm-5.1, AQ/mm-7.1 and TR/mm-3.1. Specifically, the 2024 Final EIR found that the 2024 DRSP would be inconsistent with the SLOAPCD CAP and regional VMT reduction efforts and would result in reactive organic gas (ROG) and nitrogen oxides (NOx) emissions above the San Luis Obispo Air Pollution Control District's (SLOAPCD)

operational significance thresholds. With 128 fewer housing units in the 2025 DRSP, the construction and operational air quality emissions would be slightly less than the 2024 DRSP and the conclusions of the 2024 Final EIR would remain accurate and slightly conservative. Further, the 2025 DRSP would remain inconsistent with SLOPACD CAP and regional VMT reduction efforts, but the area's job-to-housing balance would be slightly better due to the decrease in housing units. Impacts on sensitive receptors and impacts related to offsite improvements would not be altered by the changes in the 2025 DRSP; the slight setback increases for certain neighborhoods and the elimination of residential units would slightly reduce overall air quality impacts including those on sensitive receptors. All mitigation measures pertaining to sensitive receptors and those impacts from the 2024 Final EIR would remain relevant for the 2025 DRSP. As such, impacts related to Air Quality would be unchanged. Therefore, the revisions included in the 2025 DRSP would not exacerbate or increase the impact of the proposed project as evaluated within the 2024 Final EIR related to Air Quality, and impacts *would remain significant and unavoidable*.

3.4 BIOLOGY

The 2024 Final EIR found that the project would have significant and unavoidable impacts related to biological resources despite the incorporation of 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-12.1, BIO/mm-13.1, BIO/mm-14.1, BIO/mm-15.1, BIO/mm-16.1, BIO/mm-17.1 through BIO/mm-17.3, BIO/mm-18.1 through BIO/mm-18.3, and BIO/mm-19.1. Specifically, the project was found to have significant impacts on special status species, including Burton Mesa chaparral, California spineflower, sand buck brush, sand almond, oak woodland, and oak forest. Other mitigable impacts to plant species included pismo clarkia, mesa horkelia, Nipomo Mesa ceanothus, and sand mesa manzanita.

In the 2024 Final EIR oak tree impacts were analyzed. Approximately 3,144 trees were to be removed and 1,784 were to be preserved. In the 2025 DRSP, more area would be allotted for open space and more oak trees would be preserved. In the 2025 DRSP approximately 2,949 oaks would be removed, 195 fewer than the 2025 approved DRSP and approximately 1,979 would be retained, 195 more than the approved 2024 DRSP. The additional open space and 128 fewer housing units proposed by the 2025 DRSP would result in slightly reduced impacts on special status plant species due to an overall reduction in development and ground disturbance. Therefore, the revisions included in the 2025 DRSP do not alter the assessments or conclusions related to biological resources included in the 2025 Final EIR, and impacts would remain *significant and unavoidable*.

3.5 CULTURAL RESOURCES

The 2024 Final EIR found that the project would have significant but mitigable impacts related to Cultural Resources and incorporates CR/mm-1.1, CR/mm-2.1 through CR/mm-2.4, and CR/mm-3.1. The 2024 Final EIR identified several archaeological and historical resources on the project site and where off-site improvements would be made. The resources include three pre-historic archaeological resources. Offsite transportation and utility plans are not yet known and have the potential to impact historical resources offsite. The 2024 Final EIR determined buildout of the proposed project could disturb and/or destroy these known sites along with any undiscovered prehistoric and historic resources. Impacts to cultural resources and historical resources in the 2024 EIR were determined to be less than significant with implementation of mitigation measures, including environmentally sensitive area fencing, historic resources evaluations, data recovery plans, resource protection plans, worker awareness training, and monitoring.

The additional open space and 128 fewer housing units proposed by the 2025 DRSP would slightly reduce development and the potential for impacts to cultural resources and would be consistent with the impacts identified in the 2024 Final EIR. Further, Mitigation Measure CR/mm-1.1, CR/mm-2.1 through CR/mm-2.4, and CR/mm-3.1, from the 2024 Final EIR would apply to future development associated with the 2025 DRSP. The 2025 DRSP would shrink the area being developed and disturbed and increase the area of open space as compared to the 2024 DRSP. Therefore, the 2025 DRSP does not alter the assessments or conclusions related to cultural resources impacts of the 2024 Final EIR, and impacts would remain *less than significant with mitigation.*

3.6 ENERGY

The 2024 Final 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 which would reduce inefficient equipment use and long-term mobile source emissions and VMT, through incorporation of site design features that would promote pedestrian connectivity, bicycle, and transit use. As all buildings would be subject to the same applicable energy efficiency standards identified in the 2024 Final EIR, adoption of the 2025 DRSP would not result in wasteful, inefficient, or unnecessary consumption of energy resources. Furthermore, fewer housing units would result in slightly less overall energy usage for the 2025 DRSP, both through electrical use and fuel use associated with mobile sources. As such, impacts related to Energy would be marginally reduced. 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.*

3.7 GEOLOGY AND SOILS

The 2024 Final 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 revisions included in the 2025 DRSP would not result in any changes to the environmental setting of the project site, or the land use types proposed by the project. The revised project would have similar impacts related to seismic ground failure, erosion, ground failure, and on paleontological resources. As such, the impacts related to Geology & Soils would be unchanged. Therefore, the revisions included in the 2025 DRSP do not alter the assessments or conclusions related to Geology & Soils included in the 2024 Final EIR, and impacts would remain *less than significant with mitigation*.

3.8 GREENHOUSE GAS EMISSIONS

The 2024 Final EIR found that the project would have significant and unavoidable impacts related to Greenhouse Gas Emissions despite the incorporation of AQ/mm-3.1, AQ/mm-3.3, and TR/mm-3.1, GHG/mm-1.1. With 128 fewer housing units in the 2025 DRSP, GHG emissions would be less than anticipated in the 2024 DRSP and the conclusions of the 2024 Final EIR would remain accurate and slightly conservative. As such, impacts related to Greenhouse Gas Emissions would be unchanged. Therefore, the revisions included in the 2025 DRSP would not exacerbate or increase the impact of the proposed project as evaluated within the 2024 Final EIR related to Greenhouse Gas Emissions, and impacts would remain *significant and unavoidable*.

3.9 HAZARDS AND HAZARDOUS MATERIALS

The 2024 Final EIR found that the project would have significant but mitigable impacts related to Hazards & Hazardous Materials due to the proximity of construction to naturally occurring asbestos and of offsite improvements to an active cleanup program site. Mitigation measures HAZ/mm-7.1, as well as AQ/mm-7.1 and BIO/mm-16.1 through BIO/mm-16.3 were identified to reduce these impacts to less than significant. The revisions included in the 2025 DRSP would not result in any changes to the environmental setting of the project site, or the land use types proposed by the project. As such, impacts related to Hazards & Hazardous Materials would be unchanged. Therefore, the revisions included in the 2025 DRSP do not alter the assessments or conclusions related to Hazards & Hazardous Materials included in the 2024 Final EIR, and impacts would remain *less than significant with mitigation*.

3.10 HYDROLOGY AND WATER QUALITY

The 2024 Final EIR found that the project would have significant but mitigable impacts related to Hydrology & Water Quality related to construction activities in proximity to Nipomo Creek and its drainages, and incorporates BIO/mm-17.1 through BIO/mm-17.3 to reduce this impact to less than significant. All construction would be subject to the same applicable building standards and regulations identified in the 2024 Final EIR and adoption of the 2025 DRSP would not result in any new issues related to water quality standards, waste discharge, or drainage. Further, the revisions included in the 2025 DRSP would not result in any changes to the environmental setting of the project site and the land use types proposed by the project. As such, impacts related to Hydrology & Water Quality would be unchanged. Therefore, the revisions to the 2024 DRSP do not alter the assessments or conclusions related to Hydrology and Water Quality included in the 2024 Final EIR, and impacts would remain *less than significant with mitigation*.

3.11 LAND USE AND PLANNING

The 2024 Final 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. Specifically, it was determined the 2024 DRSP would result in a significant increase of the gap between jobs and housing in the community of Nipomo, which is inconsistent with Land Use Planning Policy L-3 of the SLOAPCD Clean Air Plan, and would also be inconsistent with County Conservation and Open Space Element Goal BR 1, Policy 1.2, BR Policy 1.4, BR Policy 1.9, Policy BR 2.6, Goal BR 3, Policy BR 3.1, Policy BR 3.2, Policy BR 3.3, and several Implementation Strategies related to special status plant species. As discussed above, the revisions included in the 2025 DRSP would not result in any changes to the environmental setting of the project site, or the land use types proposed by the project that would result in new or increased impacts related to land use or population. The project would result in a slight increase to the projected jobs-to-housing ratio through the loss of 128 housing units, bringing the project in slightly closer alignment to a 1.0 ratio. As such, impacts related to Land Use & Planning would be slightly reduced and the determinations in the 2024 Final EIR would remain unchanged. Therefore, the revisions included in the 2025 DRSP do not alter the assessments or conclusions related to Land Use & Planning included in the 2025 Final EIR, and impacts *would remain significant and unavoidable*.

3.12 MINERAL RESOURCES

The 2024 Final EIR found that the project would have no impacts related to Mineral Resources. The revisions included in the 2025 DRSP would not result in any changes to the environmental setting of the project site, or the land use types proposed by the project. As such, the impacts related to Mineral Resources would be unchanged. Therefore, the revisions included in the 2025 DRSP do not alter the assessments or conclusions related to Mineral Resources included in the 2024 Final EIR, there would remain *no impact.*

3.13 NOISE

The 2024 Final 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. Subtracting housing units from the 2024 DRSP would have minor beneficial consequences for noise-related impacts and could slightly reduce noise impacts related to construction and operation. Housing units along Neighborhood 9's western border have been eliminated, and open space would now abut the adjacent offsite neighborhood. Comparable minor reductions in the level of development and associated noise would occur throughout the Specific Plan Area under the 2025 DRSP. As such, impacts related to Noise would be unchanged. Therefore, the revisions included in the 2025 DRSP do not alter the assessments or conclusions related to Noise included in the 2024 Final EIR, and impacts would remain *less than significant with mitigation*.

3.14 POPULATION AND HOUSING

The 2024 Final EIR found that the project would have significant and unavoidable impacts related to Population and Housing due to project-specific and cumulative unplanned population growth. The revisions included in the 2025 DRSP would not result in any changes to the environmental setting of the project site, or the land use types proposed by the project. The decrease in housing units would slightly decrease the anticipated total population generated by the project by approximately 720 residents from both the 128 housing units and loss of 100 mandatory accessory dwelling units. This housing loss would also slightly decrease the jobs-to-housing imbalance projected by the 2014 Final EIR, but would not significantly change the findings of the 2024 Final EIR related to unplanned population growth as the reduced project would still result in a 2030 population 10.6% over San Luis Obispo Council of Government estimates. As such, impacts related to Population and Housing would be unchanged. Therefore, the revisions included in the 2025 DRSP do not alter the assessments or conclusions related to Population and Housing included in the 2025 Final EIR, and impacts would remain *significant and unavoidable.*

3.15 PUBLIC SERVICES

The 2024 Final EIR found that the project would have significant but mitigable impacts related to Public Services and implements PS/mm-1.1. The revisions included in the 2025 DRSP would not result in any changes to the environmental setting of the project site, or the land use types proposed by the project. The project would continue to be subject to the same County Public Facilities Fees identified in the 2024 Final EIR and approved Development Agreement. Subtracting housing units would proportionally decrease these fees. As such, impacts related to Public Services would be unchanged. Therefore, the revisions included in the 2025 DRSP do not alter the assessments or conclusions related to Public Services included in the 2025 Final EIR, and impacts would remain *less than significant with mitigation*.

3.16 RECREATION

The 2024 Final 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 revisions included in the 2025 DRSP would not result in any changes to the environmental setting of the project site, or the land use types proposed by the project. Further, the 2025 DRSP would still include the development of park space and slightly increase the park area from 6.3 acres to 6.34 acres, which would continue to address demand for existing recreational facilities within the county and the community by providing new local recreational facilities. Additionally, the loss of Neighborhood 10A would add 5.26 acres of new Open Space area. As such, impacts related to Recreation would be unchanged. Therefore, the revisions included in the 2025 DRSP do not alter the assessments or conclusions related to Recreation included in the 2024 Final EIR, and impacts would remain *less than significant with mitigation.*

3.17 TRANSPORTATION

The 2024 Final EIR found that the project would have significant and unavoidable impacts related to transportation despite the incorporation of TR/mm-3.1. Specifically, the 2014 Final EIR found the 2024 DRSP would exceed County vehicle miles travelled (VMT) thresholds and therefore would not be consistent with State CEQA Guidelines Section 15064.3(b). VMT per employee would be incrementally reduced compared to existing conditions; however, the project-related increase in residential VMT per capita and overall VMT would exceed the County VMT thresholds. The 128 fewer housing units would decrease the VMT impacts of the proposed project closer to the County residential VMT per capita threshold and overall VMT threshold. All other impacts on transportation in the 2024 Final EIR would not be affected by the changes in the 2025 DRSP. Therefore, the revisions included in the 2025 DRSP would not exacerbate or increase the impact of the proposed project as evaluated within the 2024 Final EIR related to Transportation, and impacts would remain *significant and unavoidable*.

3.18 TRIBAL CULTURAL RESOURCES

The 2024 Final 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 revisions included in the 2025 DRSP would not result in any changes to the environmental setting of the project site, or the land use types proposed by the project. On May 27, 2025, the County sent notice of the 2025 DRSP to tribal contacts identified in the Local Government Tribal Consultation List provided by the Native American Heritage Commission. Responses requesting consultation were received from the Northern Chumash Tribal Council and the yak tityu tityu yak tiłhini – Northern Chumash Tribe. Consultation did not result in any changes to the proposed mitigation measures. As such, impacts related to Tribal & Cultural Resources would be unchanged. Therefore, the revisions included in the 2025 DRSP do not alter the assessments or conclusions related to Tribal & Cultural Resources included in the 2024 Final EIR, and impacts would remain *less than significant with mitigation*.

3.19 UTILITIES AND SERVICE SYSTEMS

The 2024 Final EIR found that the project would have significant but mitigable impacts related to Utilities and Service Systems and implements 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 and 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-11.1, BIO/mm-13.1, BIO/mm-14.1, BIO/mm-15.1, BIO/mm-16.1, BIO/mm-17.1 through BIO/mm-17.3, BIO/mm-18.1 through BIO/mm-18.4, BIO/mm-19.1, CR/mm 1.1 through CR/mm-1.4, HAZ/mm-7.1, GEO/mm-8.1 through GEO/mm 8.3, and N/mm 1.1. and USS/mm-3.1. While most of these impacts were identified in other resource sections of the EIR, USS Impact 3 identifies a potential impact related to water supply availability due to unknowns regarding the specific timing of buildout of the DRSP and the reliability of future water supply due to the potential for prolonged periods of drought and increasing water demands due to population growth. Mitigation Measure USS/mm-2.1 requires future DRSP developers to provide proof of water availability sufficient to meet the estimated water demand of proposed development based on the demand projections included in the Dana Reserve Water Supply Assessment prior to issuance of development permits for any project development phase. The revisions included in the 2025 DRSP would not result in any changes to the environmental setting of the project site, or the land use types proposed by the project. Water demand and wastewater generation would decrease slightly for the 2025 DRSP due to the reduction in housing units. As such, impacts related to Utilities and Service Systems would be unchanged. Therefore, the revisions included in the 2025 DRSP do not alter the assessments or conclusions related to Utilities and Service Systems included in the 2024 Final EIR, and impacts would remain *less than significant with mitigation.*

3.20 WILDFIRE

The 2024 Final 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 open space and 128 fewer housing units proposed by the 2025 DRSP would be consistent with the evaluated 2024 DRSP and would not exacerbate any project impacts related to wildfire. The revisions included in the 2025 DRSP would not result in any changes to the environmental setting of the project site or the land use types proposed by the project. As such, the impacts related to Wildfire would be unchanged. Therefore, the revisions included in the 2025 DRSP do not alter the assessments or conclusions related to Wildfire included in the 2024 Final EIR, and impacts would remain *less than significant with mitigation*.

CHAPTER 4. CONCLUSION

The proposed 2025 Dana Reserve Specific Plan amendments reflect an overall reduction in proposed development and do not involve any conditions that require preparation of a subsequent or supplemental EIR. This Addendum demonstrates that the proposed amendments would not require major revisions to the 2024 Final EIR because the changes 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 proposed 2025 DRSP would not result in a new significant impact or a substantial increase in the severity of an impact identified in the 2024 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 2024 Final EIR that would 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). Therefore, based on the criteria established in Sections 15162 and 15164 of the State CEQA Guidelines, an Addendum is the proper CEQA documentation for the Specific Plan Amendments.

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