

**Addendum No. 1 to the Initial Study/Negative  
Declaration No. IP 22-0133  
for  
Housing-Related Amendments to the County of Orange  
General Plan and Comprehensive Zoning Code**

*Prepared for:*



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and  
Board of Supervisors  
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## Chapter 1: Introduction

The purpose of this Addendum is to document minor changes to the Initial Study/Negative Declaration (IS/ND) No. IP 22-0133 for the Housing-Related Updates to the County of Orange General Plan and Comprehensive Zoning Code Project (Project) adopted in September 2022.

### 1.1 Project Title

Housing-Related Amendments to the County of Orange General Plan and Comprehensive Zoning Code

### 1.2 Lead Agency Name | Address

County of Orange  
OC Public Works, Development Services/Planning  
601 North Ross Street  
Santa Ana, California 92701

### 1.3 Lead Agency Contact Person | Telephone Number | Email

Cindy Salazar, Planning Division Manager  
OC Development Services/Planning  
Telephone: 714.667.8870  
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### 1.4 Project Location

The Project location is the unincorporated portion of Orange County. Orange County is located along the Pacific Ocean between Los Angeles County to the north and northwest, San Bernardino County to the northeast, Riverside County to the east, and San Diego County to the southeast. Orange County stretches approximately 40 miles along the coast and extends inland approximately 20 miles, covering 798 square miles. Refer to Figure 1 – Regional Location and Figure 2 – Orange County Unincorporated Areas.

### 1.5 Environmental Documentation

Pursuant to Section 15164 of the CEQA Guidelines, an addendum to an adopted Negative Declaration may be prepared if “only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent environmental impact report or negative declaration have occurred.”

The project considered in the prior environmental document IS/ND No. IP 22-0133 (IS/ND No. IP 22-0133) examined implementing a policy framework necessary to meet housing needs by accommodating the County’s RHNA allocation of 10,406 units through housing-related amendments to the County of Orange General Plan (GP) Elements and Comprehensive Zoning Code (ZC). IS/ND No. IP 22-0133 analyzed the expansion of the Housing Opportunities Overlay, which included a maximum development density of up to 70 dwelling units per acre (du/ac) for eligible affordable housing projects located in commercial, industrial, and multifamily residential base districts. The current proposed Project would rezone residential professional (RP) and commercial zoning districts<sup>1</sup> to a new Mixed-Use (MX) zone and would

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<sup>1</sup> The commercial areas of Silverado Canyon, Costa Mesa Golf Course Parking Lot, and the Ranch at Newport Bay Commercial Center are not included in this Project and will retain their existing zoning of CN – Commercial Neighborhood, C2 – General Business, and C1 – Local Business, respectively.

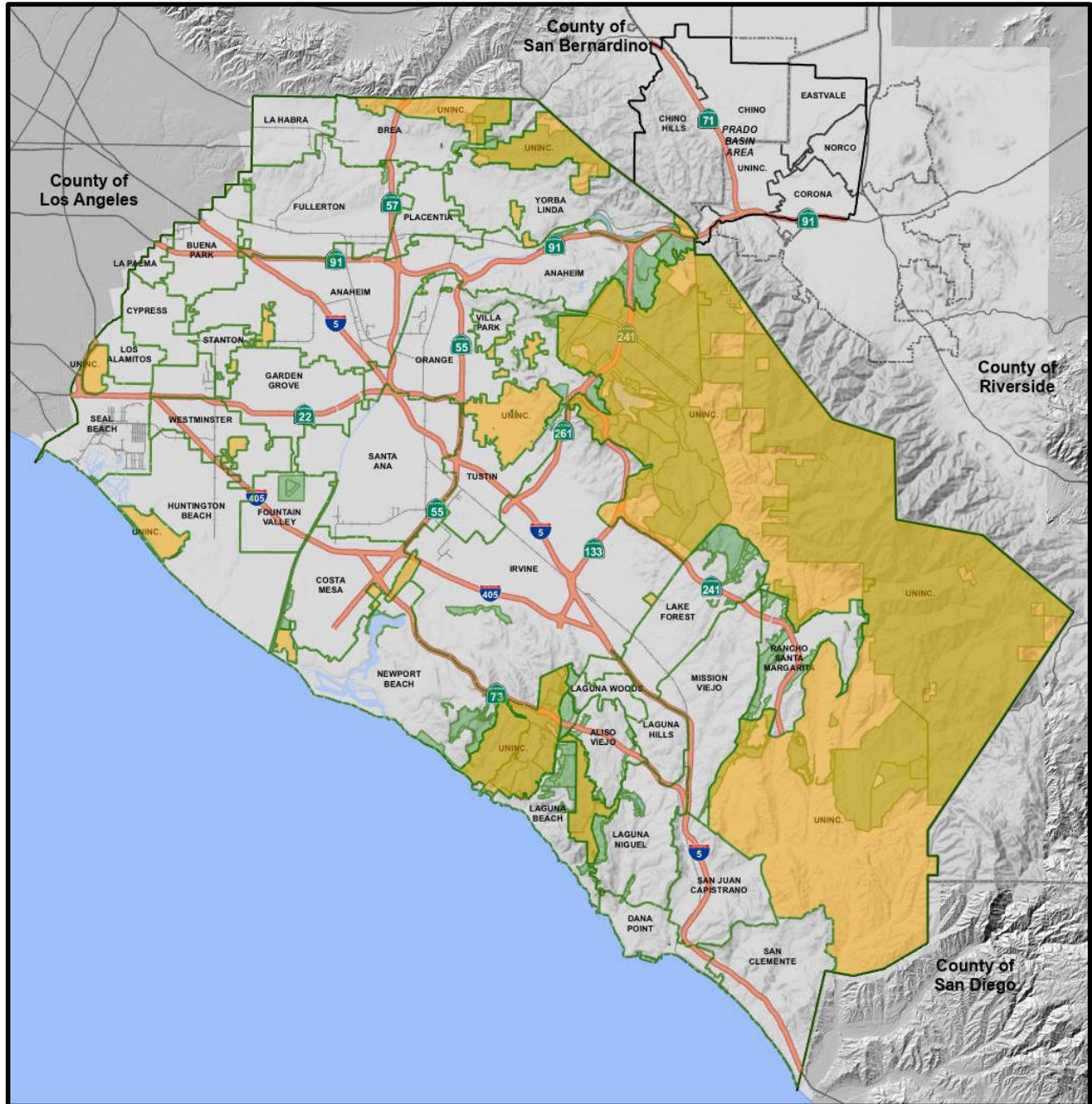
rezone Two-Family Residential (R2D) zones to either the Multifamily Dwellings (R2) or Suburban Multifamily Dwellings (R4) zones depending on where the R2D is located. In addition, the proposed Project would update the multifamily residential development standards to require a minimum base density of 30 du/ac.

This Addendum evaluates the proposed changes to the zoning districts and the requirement of a minimum base density specific to multifamily residential zoned properties. The update to the base density is less than the 70 du/ac maximum density for the Housing Opportunities Overlay studied in IS/ND No. IP 22-0133. In addition, multifamily zoning districts currently allow a 43 du/ac maximum density, which is considered the baseline existing condition for analysis of the new minimum required density. The proposed changes to the GP and ZC fall within the scope of the resource impacts as analyzed in the previously prepared environmental document.

None of the conditions described in Sections 15162 have been met. The proposed changes to the housing-related portions of the County of Orange GP and Comprehensive ZC will not significantly impact any resources as described in adopted IS/ND No. IP 22-0133. The proposed changes are consistent with the original intent of the amendments described in and analysis of IS/ND No. IP 22-0133. Therefore, preparation of an Addendum to adopted IS/ND No. IP 22-0133 is appropriate to satisfy the requirements of CEQA.



**Figure 2: Orange County Unincorporated Areas**





Housing-Related Amendments to the County of Orange General Plan and Comprehensive Zoning Code  
Environmental Determination

## Chapter 2: Environmental Determination

Based on the analysis conducted in this Addendum, the County of Orange, OC Public Works, Development Services/Planning, as the Lead Agency, has made the following determination:

**Table 1: Environmental Determination**

I find that the proposed project COULD NOT have a significant effect on the environment, and a <b>NEGATIVE DECLARATION</b> will be prepared.	<input type="checkbox"/>
I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made or agreed to by the project proponent. A <b>MITIGATED NEGATIVE DECLARATION</b> will be prepared.	<input type="checkbox"/>
I find that the proposed project MAY have a significant effect on the environment, and an <b>ENVIRONMENTAL IMPACT REPORT</b> is required.	<input type="checkbox"/>
I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An <b>ENVIRONMENTAL IMPACT REPORT</b> is required, but it must analyze only the effects that remain to be addressed.	<input type="checkbox"/>
I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier <b>EIR</b> or <b>NEGATIVE DECLARATION</b> pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier <b>EIR</b> or <b>NEGATIVE DECLARATION</b> , including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.	<input type="checkbox"/>
I find that the proposed project has previously been analyzed as part of an earlier CEQA document adopted/certified pursuant to the State CEQA Guidelines and the County's adopted Local CEQA Guidelines. The proposed project is a component of the whole action analyzed in the previously adopted/certified CEQA document	<input type="checkbox"/>
I find that the potential environmental impacts associated with the proposed project have previously been analyzed as part of an earlier CEQA document adopted/certified pursuant to CEQA. Minor additions and/or clarifications are needed to make the previous documentation adequate to cover the project, which are documented in this addendum to the earlier CEQA document (CEQA §15164) (IS/ND No. IP 22-0133 was adopted by the Orange County Board of Supervisors on September 27, 2022).	<input checked="" type="checkbox"/>
I find that the proposed project Has previously been analyzed as part of an earlier CEQA document (which either mitigated the project or adopted impacts pursuant to findings) adopted/certified pursuant to State and County CEQA Guidelines. However, there is important new information and/or substantial changes have occurred requiring the preparation of an additional CEQA document (ND or EIR) pursuant to CEQA Guidelines Sections 15162 through 15163.	<input type="checkbox"/>

Signature

April 29, 2024

Date

Virginia Gomez

Printed Name

## **Chapter 3: Project Changes**

### **3.1 Introduction**

Initial Study/Negative Declaration (IS/ND) No. IP 22-0133 (IS/ND No. IP 22-0133) evaluated the impacts of certain County actions, including a Zoning Code (ZC) Amendment to increase the existing base density maximum from 43 dwelling units per acre (du/ac) to 70 du/ac for eligible affordable housing projects located in the Housing Opportunities Overlay zones in commercial, industrial, and multifamily residential districts. The County used IS/ND No. IP 22-0133 to support the ZC Amendment, along with actions to update: (1) the County’s Housing Element for the 6<sup>th</sup> Cycle (2021-2029); (2) the Land Use Element; and (3) the Safety Element; and (4) preparation of an Environmental Justice Element. These actions covered by IS/ND No. IP 22-0133 supported the County’s completion of the 6<sup>th</sup> Cycle Housing Element, including satisfying the County’s Regional Housing Needs Assessment (RHNA) allocation of 10,406 units.

IS/ND No. IP 22-0133 evaluated the increase of the base density for eligible projects within the Housing Opportunities Overlay and associated General Plan (GP) and ZC amendments and concluded that Project implementation would result in no direct or indirect impacts to the environment as demonstrated in the evaluation of each resource category. The Orange County Board of Supervisors adopted IS/ND No. IP 22-0133 for the Housing-Related Amendments to the County of Orange GP and Comprehensive ZC on September 27, 2022. However, since the adoption of IS/ND No. IP 22-0133, changes in State Law and in the County’s ability to meet its RHNA allocation have resulted in required updates to the County’s ZC and GP to ensure these policy documents remain consistent with the law.

### **3.2 Proposed Project**

This Addendum evaluates updates to the County GP and Comprehensive ZC needed to conform to State law. To satisfy and meet its RHNA allocation in a manner consistent with State law, the County will rezone residential professional (RP) and commercial zoning districts<sup>2</sup> to a new Mixed-Use (MX) zone and would rezone the Two-Family Residential (R2D) zone to the Multifamily Dwellings (R2) or Suburban Multifamily Dwellings (R4) zones (proposed Project). In addition, the proposed Project would update multifamily residential development standards with a minimum base density of 30 du/ac. The MX zone is proposed to apply to the same zoning districts as the existing Housing Opportunities Overlay.

This Addendum evaluates the proposed changes to zoning districts and to the minimum base density specific to multifamily residential zoned properties. The update to the minimum base density is less than the 70 du/ac maximum density for the Housing Opportunities Overlay studied in IS/ND No. IP 22-0133. Multifamily zoning districts currently allow a 43 du/ac maximum, which is considered the baseline existing condition for analysis of the new minimum required density in the existing zoning districts and the new MX Zoning District. Therefore, the proposed zone changes and revised development standards fall within the Project evaluated in IS/ND No. IP 22-0133, which was intended to increase the number of available sites for the development of affordable housing.

### **3.3 Environmental Setting and Surrounding Land Uses**

The proposed Project is located within the unincorporated portion of Orange County (refer to Figure 2) and specifically within sites suitable to accommodate portions of the County’s RHNA allocation. The sites

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<sup>2</sup> The commercial areas of Silverado Canyon, Costa Mesa Golf Course Parking Lot, and the Ranch at Newport Bay Commercial Center are not included in the proposed Project and will retain their existing zoning of CN – Commercial Neighborhood, C2 – General Business, and C1 – Local Business, respectively.



are presently developed with different land uses consisting of residential, commercial, office, retail, and industrial uses and are non-vacant. Each of the multifamily zoned areas are currently zoned for development at a density of up to 43 du/ac, and all multifamily or commercial zoned areas are currently subject to the Housing Opportunities Overlay, which allows individual properties the option of utilizing a higher maximum development density of 70 du/ac if the proposed development includes affordable housing. Additionally, these areas are subject to existing development standards that require a Site Development Permit for developments that include five (5) units or more. This requirement to obtain a Site Development Permit for developments with five (5) units or more would not change as part of the proposed Project. With the existing Housing Opportunities Overlay in place, the locations affected by the proposed Project currently allow multifamily housing developments (both affordable and market-rate), like those that would be permissible as part of the proposed Project.

## Chapter 4: Environmental Evaluation

### 4.1 Analysis Methodology

The analysis in this section is based on the Initial Study/ Negative Declaration prepared for the Housing-Related Amendments to the County of Orange GP and Comprehensive ZC Project (IS/ND No. IP 22-0133) and identifies the changes that would be necessary (if any) to reflect the new MX zone and establishment of a minimum base density.

The purpose of this Addendum is to compare the proposed zoning and development standard changes to the project analyzed in IS/ND No. IP 22-0133, and to determine if the scope and analysis of IS/ND No. IP 22-0133 adequately analyzes the potential impacts of these changes or if any of the conditions described in Section 15162 of the State CEQA Guidelines are present.

Conditions described in CEQA Guidelines Section 15162 that would trigger the need to prepare an Subsequent EIR, an Supplemental EIR, or other environmental documentation to evaluate project impacts include: (1) changes to the project that require major revisions of the previous environmental documentation due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified effects; (2) substantial changes with respect to the circumstances under which the project is undertaken that require major revisions of the previous environmental documentation due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified effects; or (3) the availability of new information of substantial importance relating to significant effects or mitigation measures or alternatives that was not known and could not have been known when the environmental documentation was certified as complete.

IS/ND No. IP 22-0133 is incorporated by reference into this Addendum, consistent with CEQA Guidelines Section 15150.

### 4.2 Evaluation

IS/ND No. IP 22-0133 concluded that all potential direct or indirect impacts from updating the Housing Opportunities Overlay, which included an increase of maximum density from 43 to 70 dwelling units per acre (du/ac) for eligible projects, were evaluated and determined to result in no impacts. As noted in IS/ND No. IP 22-0133, the project that was considered implements a policy framework necessary to meet housing needs to accommodate the County's RHNA allocation of 10,406 units through housing-related amendments to the GP Elements and Comprehensive ZC. The proposed Project will rezone RP and commercial zoning districts<sup>3</sup> to a new MX zone and would rezone the R2D zone to the R2 or R4 zones. In addition, the proposed Project would update multifamily residential development standards with a minimum base density of 30 du/ac. These revised standards are consistent with the scope of the project previously studied and approved in IS/ND No. IP 22-0133 as they would authorize housing as permitted by the base zoning designation or the Housing Opportunities Overlay. IS/ND No. IP 22-0133 approved a maximum 70 du/ac density for eligible projects within the Housing Opportunities Overlay, which applies to the existing multifamily and commercial zoning districts that are now proposed to comprise the new MX Zone. In addition, prior to the approval of IS/ND No. IP 22-0133, the zoning in these districts authorized a development density maximum of up to 43 du/ac and included a site development permit process for

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<sup>3</sup> The commercial areas of Silverado Canyon, Costa Mesa Golf Course Parking Lot, and the Ranch at Newport Bay Commercial Center are not included in the proposed Project and will retain their existing zoning of CN – Commercial Neighborhood, C2 – General Business, and C1 – Local Business, respectively.

housing developments with five (5) units or more. The proposed Project would introduce a new minimum density of 30 du/ac – well below the maximums authorized under existing zoning and studied in IS/ND No. IP 22-0133 – and would change the designation of several commercial zoning districts and the RP zoning district to the new MX Zone.

The County is legally obligated to identify suitable sites but not required to propose development as part of the Housing Element update. Project implementation merely increases potential development density. The proposed updates do not grant any land use entitlements, authorize development of any specific development project, or require any direct physical changes to land or existing development. Planning review with OC Development Services/Planning would still be required for any new development proposed that includes five (5) units or more, even if that development is consistent with the amended GP Elements and Comprehensive ZC. Per the existing ZC, multifamily development projects of five (5) or more dwelling units are permitted subject to a Site Development Permit and reviewed by the Director of OC Development Services/Planning. This requirement would not change as part of the proposed Project. Therefore, the rezone of RP and commercial zoning districts to a new MX zone and rezone of the R2D zone to the R2 or R4 zones are consistent with IS/ND No. IP 22-0133. Analysis of the environmental factors potentially affected by this Project is provided below.

#### **4.2.1 Aesthetics**

- a. Have a substantial adverse effect on a scenic vista?

Consistent with Section 3.1 (Aesthetics) of adopted IS/ND No. IP 22-0133, the proposed Project is a policy framework that addresses the housing needs requirements for unincorporated Orange County. The proposed Project applies to urbanized areas, and all proposed development of five (5) units or more currently requires and would continue to require a Site Development Permit. Site Development Permit discretionary review allows for further CEQA review and a consistency review of an actual proposed development against the development standards, including building heights and setback requirements for the purposes of protecting the scenic vistas. Therefore, the proposed Project would not cause additional direct or indirect impacts to scenic vistas that were not previously analyzed in IS/ND No. IP 22-0133.

- b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

See response to a) above. The proposed Project would not cause additional direct or indirect impacts to scenic resources within state scenic highways that were not previously analyzed in IS/ND No. IP 22-0133.

- c. In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

See response to a) above. The proposed Project would not cause additional direct or indirect impacts to the existing visual character in nonurbanized and urbanized areas and would not conflict with the existing zoning or regulations that were previously analyzed in IS/ND No. IP 22-0133.

- d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

See response to a) above. The proposed Project would not cause additional direct or indirect impacts to daytime and nighttime views due to light and glare that were not previously analyzed in IS/ND No. IP 22-0133.

#### **4.2.2 Agriculture and Forestry Resources**

- a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

Consistent with Section 3.2 (Agriculture and Forestry Resources) of adopted IS/ND No. IP 22-0133, the proposed Project applies to developed parcels and urbanized areas. The proposed Project does not apply to or affect any agricultural zones or prime farmland. The proposed Project would not cause additional direct or indirect impacts related to farmland that were not previously analyzed in IS/ND No. IP 22-0133.

- b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?

Consistent with Section 3.2 (Agriculture and Forestry Resources) of adopted IS/ND No. IP 22-0133, the proposed Project applies to developed parcels and urbanized areas. The proposed Project does not apply to or affect any agricultural zones or parcels with Williamson Act contracts. The proposed Project would not cause additional direct or indirect impacts related to zoning for agricultural use that were not previously analyzed in IS/ND No. IP 22-0133.

- c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

Consistent with Section 3.2 (Agriculture and Forestry Resources) of adopted IS/ND No. IP 22-0133, the proposed Project applies to developed parcels and urbanized areas. The proposed Project does not apply to or affect any forest land, timberland, or timberland zoned for Timberland Production. The proposed Project would not cause additional direct or indirect impacts related to forest land or timberland that were not previously analyzed in IS/ND No. IP 22-0133.

- d. Result in the loss of forest land or conversion of forest land to non-forest use?

See response to c) above. The proposed Project would not cause additional direct or indirect impacts related to forest land that were not previously analyzed in IS/ND No. IP 22-0133.

- e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

Consistent with Section 3.2 (Agriculture and Forestry Resources) of adopted IS/ND No. IP 22-0133, the proposed Project applies to developed parcels and urbanized areas. The proposed Project does not apply

to or affect any agricultural zones or prime farmland and does not convert any designated forest land to a non-forest use. The proposed Project would not cause additional direct or indirect impacts related to Agriculture and Forestry Resources that were not previously analyzed in IS/ND No. IP 22-0133.

#### **4.2.3 Air Quality**

- a. Conflict with or obstruct implementation of the applicable air quality plan?

Consistent with Section 3.3 (Air Quality) of adopted IS/ND No. IP 22-0133, the proposed Project is a policy framework designed to meet the housing needs requirements for unincorporated Orange County. The proposed Project affects parcels that are already designated and used for residential development and commercial development that allows housing. The parcels for which the existing zones are changing to MX, R2 or R4, or for which the minimum du/ac standards are being set, are already non-vacant developed sites. The MX zoning designation will allow both commercial and residential development consistent with the existing use of the identified parcels. The sites' existing and proposed zone designations already assume emissions generated by the nature of the land use and will continue to be consistent with existing air quality plans as the proposed Project does not include redevelopment of the affected parcels. Emissions in these zones are anticipated to be from vehicles such as trucks and passenger vehicles. The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential future development density. Therefore, the proposed Project would not conflict with and would not cause additional direct or indirect impacts related to implementation of applicable air quality plans or standards that were not previously analyzed in the IS/ND No. IP 22-0133.

- b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

See response to a) above. Given that the proposed Project does not include any proposed development, and instead consists of a policy framework designed to meet housing needs requirements for unincorporated Orange County, the proposed Project would not violate any air quality standard or contribute substantially to an existing or air quality violation.

- c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

See response to a) above. The proposed Project would not generate new emissions beyond the existing uses and would not cause additional direct or indirect impacts related to increases in any criteria pollutants that were not previously analyzed in the IS/ND No. IP 22-0133.

- d. Expose sensitive receptors to substantial pollutant concentrations?

See response to a) above. The proposed Project would not generate new emissions beyond the existing uses and would not cause additional direct or indirect impacts related to pollutant concentrations especially near sensitive receptors that were not previously analyzed in the IS/ND No. IP 22-0133.

- e. Create objectionable odors affecting a substantial number of people?



See response to a) above. The proposed Project would not generate new emissions and would not cause additional direct or indirect impacts related an increase in objectionable odors that were not previously analyzed in the IS/ND No. IP 22-0133.

#### **4.2.4 Biological Resources**

- a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Consistent with Section 3.4 (Biological Resources) of adopted IS/ND No. IP 22-0133, the proposed Project applies to developed and urbanized areas and does not affect natural open spaces, existing habitat, or wildlife corridors, and does not conflict with existing local policies for the protection of biological resources. The proposed Project is a policy framework to guide future development. Any future housing development of five (5) units or more in the multifamily residential or MX zones will require a Site Development Permit, a discretionary approval necessitating environmental review of the proposed development, including evaluation of impacts to biological resources. No actual development of the affected properties is authorized by the proposed Project. The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential future development density. Therefore, the proposed Project would not cause additional direct or indirect impacts related to habitat modifications, on any species identified as a candidate, sensitive, or special status species that were not previously analyzed in the IS/ND No. IP 22-0133.

- b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

See response to a) above. The proposed Project would not cause additional direct or indirect impacts related to any riparian habitat or other sensitive natural community identified that were not previously analyzed in the IS/ND No. IP 22-0133.

- c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

See response to a) above. The proposed Project would not cause additional direct or indirect impacts related to federally protected wetlands that were not previously analyzed in the IS/ND No. IP 22-0133.

- d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

See response to a) above. The proposed Project would not cause additional direct or indirect impacts related to the movement of any species or with established native wildlife corridors or impede the use of native wildlife nursery sites that were not previously analyzed in the IS/ND No. IP 22-0133.

- e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

See response to a) above. The proposed Project would not cause additional direct or indirect impacts related to local policies or ordinances for the protection of biological resources that were not previously analyzed in the IS/ND No. IP 22-0133.

- f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

See response to e) above. The proposed Project would not cause additional direct or indirect impacts related to adopted Habitat Conservation Plan, Natural Community Conservation Plan or other approved local, regional, or state habitat conservation plan that were not previously analyzed in the IS/ND No. IP 22-0133.

#### **4.2.5 Cultural Resources**

- a. Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

Consistent with Section 3.5 (Cultural Resources) of adopted IS/ND No. IP 22-0133, the proposed Project applies to already developed and urbanized areas and is a policy framework meant to address housing needs requirements for unincorporated Orange County. There is no development proposed. Any future housing development of five (5) units or more in the multifamily residential or MX zones will require a Site Development Permit that requires evaluation of impacts to environmental resources, including to archaeological, cultural, historical, and paleontological resources. The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential future development density. Therefore, the proposed Project would not cause additional direct or indirect impacts related to the significance of a historical resource as defined in § 15064.5 that were not previously analyzed in the IS/ND No. IP 22-0133.

- b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

See response to a) above. Therefore, the proposed Project would not cause additional direct or indirect impacts related to the significance of an archaeological resource pursuant to § 15064.5 that were not previously analyzed in IS/ND No. IP 22-0133.

- c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

See response to a) above. Therefore, the proposed Project would not cause any direct or indirect impacts to a unique paleontological resource or site or unique geologic feature that were not previously analyzed in IS/ND No. IP 22-0133.

- d. Disturb any human remains, including those interred outside of formal cemeteries?

See response to a) above. In addition, at the time of any future development, Health and Safety Code Section 7050.5 will apply and will require that a project follow the statutory protocol in the event human remains are found during construction. Therefore, the proposed Project would not cause additional direct or indirect impacts any human remains that were not previously analyzed in the IS/ND No. IP 22-0133.

#### **4.2.6 Energy**

- a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Consistent with Section 3.6 (Energy) of the adopted IP No. 22-0133, the proposed Project is a policy framework that addresses the housing needs requirements for unincorporated Orange County. The proposed Project applies to urbanized areas, and all separately proposed development of five (5) units or more currently requires and would continue to require a Site Development Permit. Site Development Permit discretionary review allows for further CEQA review and a consistency review of future proposed development against development standards. The proposed Project affects parcels that already consume energy based on the nature of the land use – existing residential and commercial uses. There is no development proposed. The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential future development density. The proposed Project would not generate new unnecessary consumption of energy resources beyond the anticipated or existing uses on the parcels affected. Therefore, the proposed Project would not cause additional direct or indirect impacts related to wasteful, inefficient, or unnecessary consumption of energy resources that were not previously analyzed in the IS/ND No. IP 22-0133.

- b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

See response to a) above. Therefore, the proposed Project would not cause any additional direct or indirect conflicts with or impacts to a state or local plan for renewable or energy efficiency that were not previously analyzed in IS/ND No. IP 22-0133.

#### **4.2.7 Geology and Soils**

- a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
  - i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.
  - ii. Strong seismic ground shaking?
  - iii. Seismic-related ground failure, including liquefaction?
  - iv. Landslides?

Consistent with Section 3.7 (Geology and Soils) of the adopted IP No. 22-0133, the proposed Project is a policy framework that addresses the housing needs requirements for unincorporated Orange County. The proposed Project applies to urbanized areas, and all separately proposed development of five (5) units or more currently requires and would continue to require a Site Development Permit. Site Development Permit discretionary review allows for further CEQA review and a consistency review of future proposed

development against development standards. There is no development proposed. The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential future development density. Should a future specific development be proposed, a project-specific soils and geotechnical report may be required to disclose any impacts. Therefore, the proposed updates to the GP and ZC do not propose development and would not cause additional direct or indirect impacts related to the earthquakes, liquefaction, landslides, soil erosion, and expansive soil that were not previously analyzed in the IS/ND No. IP 22-0133.

- b. Result in substantial soil erosion or the loss of topsoil?

See response to a) above. Therefore, the proposed Project would not cause additional direct or indirect impacts related to soil erosion or the loss of topsoil that were not previously analyzed in IS/ND No. IP 22-0133.

- c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in onsite or offsite landslide, lateral spreading, subsidence, liquefaction or collapse?

See response to a) above. Therefore, the proposed Project would not cause additional direct or indirect impacts related to soil stability, landslides, lateral spreading, subsidence, liquefaction, or collapse that were not previously analyzed in IS/ND No. IP-22-0133.

- d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

See response to a) above. Therefore, the proposed Project would not cause additional direct or indirect impacts related to expansive soils that were not previously analyzed in IS/ND No. IP 22-0133.

- e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal system where sewers are not available for the disposal of wastewater?

See response to a) above. Therefore, the proposed Project would not cause additional direct or indirect impacts related to the ability of soils to support the use of septic tanks or alternative wastewater disposal systems that were not previously analyzed in IS/ND No. IP 22-0133.

#### **4.2.8 Greenhouse Gas Emissions**

- a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant effect on the environment?

Consistent with Section 3.8 (Greenhouse Gas Emissions [GHG]) of the adopted IS/ND No. IP 22-0133, the proposed Project is a policy framework that addresses the housing needs requirements for unincorporated Orange County. The proposed Project affects parcels that are already designated and used for residential development and commercial development that allows housing. The parcels for which the existing zones are changing to MX, R2 or R4, or for which the minimum du/ac standards are being set, are already non-vacant developed sites. The MX zoning designation will allow both commercial and residential development consistent with the existing use of the identified parcels. The sites' existing and proposed

zone designations already assume GHG emissions generated by the nature of the existing land use and will continue to be consistent with existing air quality plans. GHG emissions in these zones are anticipated to be from vehicles such as trucks and passenger vehicles that support the existing uses. The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential future development density. Therefore, the proposed Project would not generate new GHG emissions beyond the anticipated uses and would not cause additional direct or indirect impacts related to Greenhouse Gas Emissions and applicable plans that were not previously analyzed in the IS/ND No. IP 22-0133.

- b. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

See response a) above. Therefore, the proposed Project would not cause additional direct or indirect impacts related to compliance with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs which were not previously analyzed in IS/ND No. IP 22-0133.

#### **4.2.9 Hazards and Hazardous Materials**

- a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Consistent with Section 3.9 (Hazards and Hazardous Materials) of the adopted IP No. 22-0133, the proposed Project is a policy framework that addresses the housing needs requirements for unincorporated Orange County. There is no development proposed. The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential future development density. Therefore, the proposed updates to the GP and ZC do not propose development and would not cause additional direct or indirect impacts related to transporting or disposing of hazardous materials that were not previously analyzed in the IS/ND No. IP 22-0133.

- b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

See response to a) above. Therefore, the proposed Project would not cause any additional impacts related to hazardous materials that were not previously analyzed in IS/ND No. IP 22-0133.

- c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Consistent with Section 3.9 (Hazards and Hazardous Materials) of the adopted IP No. 22-0133, the proposed Project is a policy framework that addresses the housing needs requirements for unincorporated Orange County. The proposed Project applies to urbanized areas consisting of non-vacant lots, and all proposed development of five (5) units or more currently requires and would continue to require a Site Development Permit. Site Development Permit discretionary review allows for further CEQA review and a consistency review of future proposed development against development standards. There is no development proposed. The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential future development density. Should a specific development be proposed in the future, a project-specific Phase I/Phase II Environmental Site



Assessment would be required to disclose any impacts and mitigation for any such impacts would be required. Therefore, the proposed updates to the GP and ZC do not propose development and therefore would not cause additional direct or indirect impacts related to hazardous emissions or materials near schools that were not previously analyzed in the IS/ND No. IP 22-0133.

- d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

See response to c) above. Therefore, the proposed updates to the GP and ZC do not propose development and therefore would not cause additional direct or indirect impacts related to hazardous materials sites that were not previously analyzed in the IS/ND No. IP 22-0133.

- e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Consistent with Section 3.9 (Hazards and Hazardous Materials) of the adopted IP No. 22-0133, the proposed Project is a policy framework that addresses the housing needs requirements for unincorporated Orange County. The proposed Project applies to urbanized areas that are not located within an airport land use plan. There is no development proposed. The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential future development density. Therefore, the proposed updates to the GP and ZC do not propose development and therefore would not cause additional direct or indirect impacts related to airport land use plans that were not previously analyzed in the IS/ND No. IP 22-0133.

- f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

See response to e) above. The proposed Project is not within the vicinity of a private airstrip and therefore would not cause additional direct or indirect impacts related to safety hazards caused by proximity to private airstrips that were not previously analyzed in IS/ND No. IP 22-0133.

- g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Consistent with Section 3.9 (Hazards and Hazardous Materials) of the adopted IP No. 22-0133, the proposed Project is a policy framework that addresses the housing needs requirements for unincorporated Orange County. The proposed Project applies to urbanized non-vacant sites that are consistent with all existing applicable emergency response plans. The proposed Project does not propose development that would not alter any existing emergency response plans. The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential future development density. Therefore, the proposed updates to the GP and ZC would not cause additional direct or indirect impacts related to emergency response or evacuation plans that were not previously analyzed in the IS/ND No. IP 22-0133.

- h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Consistent with Section 3.9 (Hazards and Hazardous Materials) of the adopted IP No. 22-0133, the proposed Project is a policy framework that addresses the housing needs requirements for unincorporated Orange County. The proposed Project applies to urbanized areas that are distant from wildlands prone to wildfire. Therefore, the proposed updates to the GP and ZC would not cause additional direct or indirect impacts related to wildland fires that were not previously analyzed in the IS/ND No. IP 22-0133.

#### **4.2.10 Hydrology and Water Quality**

- a. Violate any water quality standards or waste discharge requirements?

Consistent with Section 3.10 (Hydrology and Water Quality) of the adopted IS/ND No. IP 22-0133, the proposed Project is a policy framework that addresses the housing needs requirements for unincorporated Orange County. The proposed Project applies to urbanized areas, and all future proposed development of five (5) units or more currently requires and would continue to require a Site Development Permit. Site Development Permit discretionary review allows for further CEQA review and a consistency review of future proposed development against development standards. The proposed Project affects parcels that already assume water use and consumption generated by the nature of the existing and ongoing land uses. There is no development proposed. The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential future development density. In addition, future construction activities associated with new housing development is subject to the National Pollutant Discharge Elimination System requirements and County Code requirements for drainage, discharge, and best management practices. Therefore, the proposed Project would not generate new unnecessary consumption of water resources or hydrology concerns and would not cause additional direct or indirect impacts related to Hydrology and Water Quality that were not previously analyzed in the IS/ND No. IP 22-0133.

- b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

See response to a) above. Therefore, because the proposed Project does not propose development, it would not cause any additional direct or indirect impacts related to depletion of groundwater supplies and groundwater recharge that were not previously analyzed in IS/ND No. IP 22-0133.

- c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on- or off-site?

See response to a) above. Therefore, because the proposed Project does not propose development, it would not cause any additional direct or indirect impacts related to drainage patterns, stream or river courses, erosion or siltation that were not previously analyzed in IS/ND No. IP 22-0133.

- d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?

See response to a) above. Therefore, because the proposed Project does not propose development, it would not cause any additional direct or indirect impacts related to drainage patterns, stream or river courses, surface runoff or flooding that were not previously analyzed in IS/ND No. IP 22-0133.

- e. Create or contribute runoff water, which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?

See response to a) above. Therefore, because the proposed Project does not propose development, it would not cause any additional direct or indirect impacts related storm water drainage systems and polluted runoff that were not previously analyzed in IS/ND No. IP 22-0133.

- f. Otherwise substantially degrade water quality?

See response to a) above. Therefore, because the proposed Project does not propose development, it would not cause any additional direct or indirect impacts related to water quality that were not previously analyzed in IS/ND No. IP 22-0133.

- g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

Consistent with Section 3.10 (Hydrology and Water Quality) of the adopted IP No. 22-0133, the proposed Project is a policy framework that addresses the housing needs requirements for unincorporated Orange County. The proposed Project applies to urbanized areas with no flood risk, reduced flood risks due to levees, or designated as areas with one percent annual chance of floods. There is no development proposed. The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential future development density. As such, the proposed Project would not cause additional direct or indirect impacts regarding the placement of housing along a 100-year flood hazard area that were not previously analyzed in the IS/ND No. IP 22-0133.

- h. Place within a 100-year flood hazard area structures, which would impede or redirect flood flows?

See response to g) above. Therefore, because the proposed Project does not propose development, it would not cause any additional direct or indirect impacts related to placement of structures within a 100-year flood hazard area that were not previously analyzed in IS/ND No. IP 22-0133.

- i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

See response to g) above. Therefore, because the proposed Project does not propose development, it would not cause any additional direct or indirect impacts related to risk of flooding that were not previously analyzed in IS/ND No. IP 22-0133.

- j. Would the project [result in] inundation by seiche, tsunami, or mudflow?

See response to g) above. Therefore, because the proposed Project does not propose development, it would not cause any additional direct or indirect impacts related to inundation by seiche, tsunami, or mudflow that were not previously analyzed in IS/ND No. IP 22-0133.

#### **4.2.11 Land Use and Planning**

- a. Physically divide an established community?

Consistent with Section 3.11 (Land Use and Planning) of the adopted IP No. 22-0133, the proposed Project is a policy framework that addresses the housing needs requirements to accommodate the County's RHNA allocation of 10,406 units through housing-related amendments to the GP Elements and Comprehensive ZC. The proposed Project will rezone RP and commercial zoning districts to a new MX zone and would rezone the R2D zone to the R2 or R4 zones. In addition, the proposed Project would establish a minimum base density for multifamily residential development at 30 du/ac. These revised standards are consistent with the scope of the project previously studied and approved in IS/ND No. IP 22-0133 as they would authorize housing as permitted by the existing base zoning designation and the Housing Opportunities Overlay. IS/ND No. IP 22-0133 approved a maximum 70 du/ac density for eligible projects within the Housing Opportunities Overlay, which applies to the existing multifamily and commercial zoning districts that are now proposed to comprise the new MX Zone. Even prior to the approval of IS/ND No. IP 22-0133, the zoning in these districts authorized a development density maximum of up to 43 du/ac and included a Site Development Permit requirement for housing developments with five or more units. The proposed Project would introduce a new minimum density for new development of 30 du/ac – well below the maximums authorized under existing zoning and studied in IS/ND No. IP 22-0133 – and would change the designation of several commercial zoning districts and the RP zoning district to the new MX Zone. There is no development proposed. The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential future development density. Therefore, the proposed Project would not cause additional direct or indirect impacts or physically divide established communities that were not previously analyzed in the IS/ND No. IP 22-0133.

- b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

See response to a) above. The proposed Project would incorporate changes into the County's Land Use Element, ZC, and GP; therefore, the proposed Project would not result in any additional direct or indirect impacts related to applicable land use plans, policies, or regulations that were not previously analyzed in IS/ND No. IP 22-0133.

- c. Conflict with any applicable habitat conservation plan or natural community conservation plan?

See response to a) above. The proposed Project applies to non-vacant sites that are already developed with existing uses. The proposed Project would continue to authorize uses of these non-vacant parcels consistent with the existing uses and does not propose any new development. Therefore, the proposed Project would not result in any additional direct or indirect impacts related to habitat conservation plans or natural community conservation plans that were not previously analyzed in IS/ND No. IP 22-0133.

#### 4.2.12 Mineral Resources

- a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

Consistent with Section 3.12 (Mineral Resources) of the adopted IS/ND No. IP 22-0133, the proposed Project does not affect areas designated for mineral resources. The proposed Project applies to urbanized areas that are currently zoned for residential and commercial uses, and the updates establish a MX zone and development standards consistent with existing zoning designations. Therefore, the proposed Project would not cause additional direct or indirect impacts related to locally important mineral resources or result in a loss of those resources that were not previously analyzed in the IS/ND No. IP 22-0133.

- b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

See response to a) above. Therefore, because the proposed Project does not propose development and does not affect any locally important mineral resource recovery sites, it would not result in any additional direct or indirect impacts to a locally important mineral resource recovery site that were not previously analyzed in IS/ND No. IP 22-0133.

#### 4.2.13 Noise

- a. Result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Consistent with Section 3.13 (Noise) of the adopted IS/ND No. IP 22-0133, the proposed Project is a policy framework that addresses the housing needs requirements for unincorporated Orange County. The proposed Project applies to urbanized areas, and all proposed development of five (5) units or more currently requires and would continue to require a Site Development Permit. Site Development Permit discretionary review allows for further CEQA review and a consistency review of future proposed development against development standards. The proposed Project affects existing parcels with established multifamily and commercial uses that already have typical noise and groundborne vibration generated by the nature of those land uses. There is no development proposed. The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential future development density. The noise levels in proposed Project areas are anticipated to be from general residential and commercial activities, consistent with the existing uses. The MX zone designation will allow both commercial and residential development consistent with the existing uses. Therefore, the proposed Project would not increase ambient noise beyond the anticipated uses and would not cause additional direct or indirect impacts related to noise levels in excess of existing standards that were not previously analyzed in the IS/ND No. IP 22-0133.

- b. Result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

See response to a) above. Therefore, the proposed Project would not result in additional direct or indirect impacts related to groundborne vibration or groundborne noise levels that were not previously analyzed in IS/ND No. IP 22-0133.



- c. Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

See response to a) above. Therefore, because the proposed Project does not propose any development, it would not result in any additional direct or indirect impacts related to permanent increases in ambient noise levels that were not previously analyzed in IS/ND No. IP 22-0133.

- d. Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

See response to a) above. Therefore, because the proposed Project does not propose any development, it would not result in any additional direct or indirect impacts related to temporary or periodic increases in ambient noise levels that were not previously analyzed in IS/ND No. IP 22-0133.

- e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Consistent with Section 3.13 (Noise) of the adopted IS/ND No. IP 22-0133, the proposed Project is a policy framework that addresses the housing needs requirements for unincorporated Orange County. The proposed Project applies to urbanized areas that are not located within an airport land use plan. There is no development proposed. The proposed Project affects existing parcels with established multifamily and commercial uses that already have typical noise generated by the nature of the land use and proximity to airports. Therefore, the proposed Project would not expose people to excessive noise beyond the existing uses and would not cause additional direct or indirect impacts related to excessive noise levels due to proximity to public airports that were not previously analyzed in the IS/ND No. IP 22-0133.

- f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

See response to e) above. The proposed Project does not affect parcels in the vicinity of a private airstrip; therefore, the proposed Project would not result in additional direct or indirect impacts related to excessive noise levels due to proximity to a private airstrip that were not previously analyzed in IS/ND No. IP 22-0133.

#### **4.2.14 Population and Housing**

- a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Consistent with Section 3.14 (Population and Housing) of the adopted IS/ND No. IP 22-0133, the proposed Project is a policy framework that addresses the housing needs requirements to accommodate the RHNA allocation of 10,406 units through housing-related amendments to the GP Elements and Comprehensive ZC. The proposed Project will rezone RP and commercial zoning districts to a new MX zone and would rezone the R2D zone to the R2 or R4 zones. In addition, the proposed Project would update multifamily residential development standards with a minimum base density of 30 du/ac. These revised standards are

consistent with the scope of the project previously studied and approved in IS/ND No. IP 22-0133 as they would authorize housing as permitted by the existing base zoning designation or the Housing Opportunities Overlay. IS/ND No. IP 22-0133 approved a maximum 70 du/ac density for eligible projects within the Housing Opportunities Overlay, which applies to the existing multifamily and commercial zoning districts that are now proposed to comprise the new MX Zone. Even prior to the approval of IS/ND No. IP 22-0133, the zoning in these districts authorized a development density maximum of up to 43 du/ac and included a Site Development Permit requirement for housing developments with five or more units. The proposed Project would introduce a new minimum density for new development of 30 du/ac – well below the maximums authorized under existing zoning and studied in IS/ND No. IP 22-0133 – and would change the designation of several commercial zoning districts and the RP zoning district to the new MX Zone. There is no development proposed. The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential future development density. The proposed Project applies to urbanized areas that are already designated for residential and commercial uses and anticipate population growth through the provision of housing. The proposed Project would not cause additional direct or indirect impacts related to inducing population growth that were not previously analyzed in the IS/ND No. IP 22-0133.

- b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

See response to a) above. The proposed Project does not propose development; therefore, the proposed Project would not result in any additional direct or indirect impacts related to displacement of housing that were not previously analyzed in IS/ND No. IP 22-0133.

- c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

See response to a) above. The proposed Project does not propose development; therefore, the proposed Project would not result in any additional direct or indirect impacts related to displacement of persons that were not previously analyzed in IS/ND No. IP 22-0133.

#### **4.2.15 Public Services**

- a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:
  - i. Fire protection?
  - ii. Police protection?
  - iii. Schools?
  - iv. Parks?
  - v. Other public facilities?

Consistent with Section 3.15 (Public Services) of the adopted IS/ND No. IP 22-0133, the proposed Project is a policy framework that addresses the housing needs requirements to accommodate the County's RHNA allocation of 10,406 units through housing-related amendments to the GP Elements and Comprehensive

ZC. The proposed Project will rezone RP and commercial zoning districts to a new MX zone and would rezone the R2D zone to the R2 or R4 zones. In addition, the proposed Project would update multifamily residential development standards with a minimum base density of 30 du/ac. These revised standards are consistent with the scope of the project previously studied and approved in IS/ND No. IP 22-0133 as they would authorize housing as permitted by the existing base zoning designation or the Housing Opportunities Overlay. IS/ND No. IP 22-0133 approved a maximum 70 du/ac density for eligible projects within the Housing Opportunities Overlay, which applies to the existing multifamily and commercial zoning districts that are now proposed to comprise the new MX Zone. Even prior to the approval of IS/ND No. IP 22-0133, the zoning in these districts authorized a development density maximum of up to 43 du/ac and included a Site Development Permit requirement for housing developments with five or more units. The proposed Project would introduce a new minimum density for new development of 30 du/ac – well below the maximums authorized under existing zoning and studied in IS/ND No. IP 22-0133 – and would change the designation of several commercial zoning districts and the RP zoning district to the new MX Zone. There is no development proposed. The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential future development density. The proposed Project applies to a developed and urbanized areas where fire and police protection services, schools, parks, and other public facilities are already provided, and are consistent with the level of anticipated public service needs in the GP. Therefore, the proposed Project would not cause additional direct or indirect impacts related to Public Services that were not previously analyzed in the IS/ND No. IP 22-0133.

#### **4.2.16 Recreation**

- a. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Consistent with Section 3.16 (Recreation) of the adopted IS/ND No. IP 22-0133, the proposed Project applies to urbanized areas that have existing recreational and public facilities. The proposed Project is a policy framework that addresses the housing needs requirements to accommodate the County's RHNA allocation of 10,406 units through housing-related amendments to the GP Elements and Comprehensive ZC. The proposed Project will rezone RP and commercial zoning districts to a new MX zone and would rezone the R2D zone to the R2 or R4 zones. In addition, the proposed Project would update multifamily residential development standards with a minimum base density of 30 du/ac. These revised standards are consistent with the scope of the project previously studied and approved in IS/ND No. IP 22-0133 as they would authorize housing as permitted by the existing base zoning designation or the Housing Opportunities Overlay. IS/ND No. IP 22-0133 approved a maximum 70 du/ac density for eligible projects within the Housing Opportunities Overlay, which applies to the existing multifamily and commercial zoning districts that are now proposed to comprise the new MX Zone. Even prior to the approval of IS/ND No. IP 22-0133, the zoning in these districts authorized a development density maximum of up to 43 du/ac and included a Site Development Permit requirement for housing developments with five or more units. The proposed Project would introduce a new minimum density for new development of 30 du/ac – well below the maximums authorized under existing zoning and studied in IS/ND No. IP 22-0133 – and would change the designation of several commercial zoning districts and the RP zoning district to the new MX Zone. There is no development proposed. The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential future development density. The Project does not affect or require expansion of existing recreational or public facilities as the existing zones and GP anticipated housing development in the areas affected by the proposed Project and planned

existing recreational facilities to address that demand. The proposed Project would not cause additional direct or indirect impacts related to increasing the use of existing neighborhood and regional parks or other recreational facilities that were not previously analyzed in the IS/ND No. IP 22-0133.

- b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

See response to a) above. The proposed Project would not cause additional direct or indirect impacts related to requiring the construction or expansion of recreational facilities that were not previously analyzed in the IS/ND No. IP 22-0133.

#### **4.2.17 Transportation**

- a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Consistent with Section 3.17 (Transportation) of the adopted IS/ND No. IP 22-0133, the proposed Project affects parcels that are already designated for residential and commercial development that allows housing. The Project updates apply to developed, urbanized areas with traffic generated by the existing residential and commercial uses. The existing circulation system and public transit facilities serve existing uses on the non-vacant parcels affected by the proposed Project. In addition, there is no development included in the proposed Project. The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential future development density. All proposed development of five (5) units or more currently requires and would continue to require a Site Development Permit. Site Development Permit discretionary review allows for further CEQA review and a consistency review of the future proposed development against development standards. Therefore, the proposed Project would not generate new transportation demands or traffic beyond the existing uses, in part, because the GP anticipated public circulation and transit needs associated with the existing uses. Therefore, the proposed Project would not cause additional direct or indirect impacts related to applicable plans, ordinances, and policies establishing measures of effectiveness for the performance of the circulation system that were not previously analyzed in the IS/ND No. IP 22-0133.

- b. Conflict with an applicable congestion management program, including, but not limited to level of service standard and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

See response to a) above. Because the proposed Project does not propose any development, and because the existing uses were included in the anticipated transportation needs addressed in the GP, the proposed Project would not result in any additional direct or indirect impacts related to congestion management that were not previously analyzed in IS/ND No. IP 22-0133.

- c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

See response to a) above. Because the proposed Project does not propose any development, and because the existing uses were included in the anticipated transportation needs addressed in the GP, the proposed Project would not result in any additional direct or indirect impacts related to air traffic patterns that were not previously analyzed in IS/ND No. IP 22-0133.

- d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Consistent with Section 3.17 (Transportation) of the adopted IS/ND No. IP 22-0133, the proposed Project is a policy framework that addresses the housing needs requirements for unincorporated Orange County. The proposed Project affects urbanized parcels that are non-vacant and designated for residential and commercial uses. The existing circulation system and public transit facilities serve existing uses on the affected parcels and provide emergency access. In addition, there is no development proposed with the updates to the GP and ZC. Therefore, the proposed Project would not cause additional direct or indirect impacts related to hazards due to design features that were not previously analyzed in the IS/ND No. IP 22-0133.

- e. Result in inadequate emergency access?

See response to d) above. Because the proposed Project does not propose any development, and because the existing uses were included in the anticipated emergency access needs addressed in the GP, the proposed Project would not result in any additional direct or indirect impacts related to emergency access that were not previously analyzed in IS/ND No. IP 22-0133.

- f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance of such facilities?

Consistent with Section 3.17 (Transportation) of the adopted IS/ND No. IP 22-0133, the proposed Project is a policy framework that addresses the housing needs requirements for unincorporated Orange County. The proposed Project affects urbanized parcels that are non-vacant and designated for residential and commercial uses. The existing circulation system and public transit facilities serve existing uses on the affected parcels. The proposed Project does not conflict with policies and regulations for these systems, services and facilities. Therefore, the proposed Project would not cause additional direct or indirect impacts related to policies and regulations regarding public active transportation facilities that were not previously analyzed in the IS/ND No. IP 22-0133.

#### **4.2.18 Tribal Cultural Resources**

- a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
  - i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?
  - ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public



Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Consistent with Section 3.18 (Tribal Cultural Resources) of the adopted IS/ND No. IP 22-0133, the proposed Project applies to urbanized areas, and is a policy framework meant to address housing needs requirements for unincorporated Orange County. There is no development proposed with the updates to the GP and ZC. Any future housing development of five (5) units or more in the multifamily residential, or MX zones will continue to require a Site Development Permit, necessitating environmental impacts evaluation including impacts to tribal cultural resources. In addition, at the time of any future development, the Health and Safety Code Section 7050.5 will apply and will require that a project follow the protocol when human remains are found on a construction site. Therefore, the proposed Project would not cause additional direct or indirect impacts to Tribal Cultural Resources listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resource, or a resource determined by the lead agency to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1 that were not previously analyzed in the IS/ND No. IP 22-0133.

#### **4.2.19 Utilities and Service Systems**

- a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Consistent with Section 3.19 (Utilities and Service Systems) of the adopted IS/ND No. IP 22-0133, the proposed Project applies to urbanized areas, and is a policy framework meant to address housing needs requirements for unincorporated Orange County. The proposed Project affects parcels that are already designated for residential and commercial development that allows housing. There is no development proposed with the updates to the GP and ZC, and no new construction of wastewater, storm water or water facilities. Any future housing development of five (5) units or more in the multifamily residential, or MX zones will require a Site Development Permit necessitating environmental impacts evaluation including impacts to wastewater treatment facilities. The County is legally obligated to identify sites but not required to propose development. County ministerial and discretionary processes also require any future proposed development to coordinate with Utility and Service Providers to confirm sufficient capacity of to serve the proposed development. Therefore, the proposed Project would not cause additional direct or indirect impacts related to wastewater treatment facilities that were not previously analyzed in the IS/ND No. IP 22-0133.

- b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

See response to a) above. The proposed Project does not include any development; therefore, the proposed Project would not cause additional direct or indirect impacts related to the construction of new or expansion of existing water or wastewater treatment facilities that were not previously analyzed in IS/ND No. IP 22-0133.

- c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

See response to a) above. The proposed Project does not include any development; therefore, the proposed Project would not cause additional direct or indirect impacts related to the construction of new or expansion of existing storm water drainage facilities that were not previously analyzed in IS/ND No. IP 22-0133.

- d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

See response to a) above. The proposed Project does not include any development; therefore, the proposed Project would not cause additional direct or indirect impacts related to the sufficiency of water supplies that were not previously analyzed in IS/ND No. IP 22-0133.

- e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

See response to a) above. The proposed Project does not include any development; therefore, the proposed Project would not cause additional direct or indirect impacts related to the capacity of wastewater treatment providers that were not previously analyzed in IS/ND No. IP 22-0133.

- f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Consistent with Section 3.19 (Utilities and Service Systems) of the adopted IS/ND No. IP 22-0133, the proposed Project applies to urbanized areas, and is a policy framework meant to address housing needs requirements for unincorporated Orange County. There is no development proposed with the updates to the GP and ZC, and therefore no new or expanded demand on landfill services. Therefore, the proposed Project would not cause additional direct or indirect impacts related to landfill capacity that were not previously analyzed in the IS/ND No. IP 22-0133

- g. Comply with federal, state, and local statutes and regulations related to solid waste?

Consistent with Section 3.19 (Utilities and Service Systems) of the adopted IS/ND No. IP 22-0133, the proposed Project applies to urbanized areas, and is a policy framework meant to address housing needs requirements for unincorporated Orange County. The County is legally obligated to identify sites but not required to propose development. The proposed Project does not conflict with policies and regulations for solid waste facilities. Therefore, the proposed Project would not cause additional direct or indirect impacts related to policies and regulations regarding solid waste that were not previously analyzed in the IS/ND No. IP 22-0133.

#### **4.2.20 Wildfire**

- a. Substantially impair an adopted emergency response plan or emergency evacuation plan.

Consistent with Section 3.20 (Wildfire) of the adopted IS/ND No. IP 22-0133, the proposed Project applies to developed, urbanized areas that provide fire protection services and have Building and Safety Code requirements for the proper development of public and private structures and facilities. The proposed

updates to the GP and ZC do not disrupt any emergency evacuation plans and do not create additional fire risks, because the proposed Project does not include development. The proposed Project includes updates to the Safety Element to ensure consistency and safety provisions for the proposed rezone of the RP and commercial zoning districts to a new MX zone and rezone of the R2D zone to the R2 or R4 zones. There is no development proposed with the updates to the GP and ZC. The County is legally obligated to identify sites but not required to propose development. In addition, the proposed Project area does not include parcels that are located in identified Fire Hazard Severity Zones. Any future proposed development in Fire Hazard Severity Zones will continue to follow the County's policies, regulations, discretionary and ministerial processes for safety and fire prevention. Therefore, the proposed Project would not cause additional direct or indirect impacts related to emergency response plans or emergency evacuation plans that were not previously analyzed in the IS/ND No. IP 22-0133.

- b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Consistent with Section 3.20 (Wildfire) of the adopted IS/ND No. IP 22-0133, the proposed Project applies to urbanized areas that are distant from wildlands prone to wildfire. The proposed Project includes updates to the Safety Element to ensure consistency and safety provisions for the proposed rezones. There is no development proposed with the updates to the GP and ZC and therefore, the proposed Project will not expose occupants to pollutant concentrations from a wildfire. Therefore, the proposed Project would not cause additional direct or indirect impacts related to wildfire, expose occupants to pollutant concentrations, or exacerbate fire risk that were not previously analyzed in the IS/ND No. IP 22-0133.

- c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

See response to b) above. The proposed Project does not propose development; therefore, the proposed Project would not cause any additional direct or indirect impacts related to infrastructure that may exacerbate fire risk that were not previously analyzed in IS/ND No. IP 22-0133.

- d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Consistent with Section 3.20 (Wildfire) of the adopted IS/ND No. IP 22-0133, the proposed Project is a policy framework that addresses the housing needs requirements for unincorporated Orange County. The proposed Project applies to urbanized areas that are distant from wildlands prone to wildfire, and includes only areas with no flood risk, reduced flood risks due to levees, or designated as areas with one percent annual chance of floods. There is no development proposed. The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential future development density. As such, the proposed Project would not cause additional direct or indirect impacts related to wildfire or flooding that were not previously analyzed in the IS/ND No. IP 22-0133.

**4.2.21 Mandatory Findings of Significance**

- a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Consistent with Section 3.21 (Mandatory Findings of Significance) of adopted IS/ND No. IP 22-0133, the proposed Project applies to developed urbanized areas that are designated residential and commercial zones. The Project is a policy framework meant to address housing needs requirements for unincorporated Orange County. The proposed Project affects parcels that are already designated for residential and commercial development, and which allow and authorize housing development. There is no development proposed as part of the updates to the GP and ZC. The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential future development density.

Response to Impact Question a): Refer to Section 4.2.4 – Biological Resources, Section 4.2.5 - Cultural Resources, and 4.2.18 – Tribal Cultural Resources. As discussed in these sections, the proposed Project would have no effect on fish or wildlife habitats or populations, plant or animal communities, protected species, or important examples of the major periods of California history or prehistory. Therefore, no impacts would not result from Project implementation that were not previously analyzed in the IS/ND No. IP 22-0133.

- b. Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Response to Impact Question b): There are no impacts resulting from this Project as analyzed in Sections 4.2.1 through 4.2.20 in this Addendum. Therefore, no cumulative impacts would occur, and the Project is not cumulatively considerable in a way not previously analyzed in the IS/ND No. IP 22-0133.

- c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Response to Impact Question c): Sections 4.2.1 through 4.2.20 in this Addendum analyzed potential impacts and did not identify any impacts resulting from Project implementation. Therefore, no significant adverse effects on human beings, either directly or indirectly, have been identified and no impacts would result that were not previously analyzed in the IS/ND No. IP 22-0133.

## Chapter 5: Conclusion

The proposed Project will support the County's 6<sup>th</sup> Cycle Housing Element Update and efforts to meet its housing needs requirements that were analyzed in the previously approved Initial Study/Negative Declaration (IS/ND) for the Housing-Related Amendments to the County of Orange GP and Comprehensive ZC Project (IP No. 22-0133). This Addendum documents minor changes to IS/ND No. IP 22-0133 for the Housing-Related Amendments to the County of Orange GP and Comprehensive ZC Project, which includes a rezone of RP and commercial zoning districts<sup>4</sup> to a new MX zone and rezoning of the R2D zone to the R2 or R4 zones. In addition, the proposed Project would update multifamily residential development standards with a minimum base density of 30 du/ac. These revised standards are consistent with the scope of the project previously studied and approved in IS/ND No. IP 22-0133 as they would authorize housing as permitted by the base zoning designation or the Housing Opportunities Overlay.

IS/ND No. IP 22-0133 approved a maximum 70 du/ac density for projects within the Housing Opportunities Overlay, which applies to the existing multifamily and commercial zoning districts that are now proposed to comprise the new MX Zone. Even prior to the approval of IS/ND No. IP 22-0133, the zoning in these districts authorized a development density maximum of up to 43 du/ac and included a Site Development Permit requirement for housing developments with five or more units. The proposed Project would introduce a new minimum density for new development of 30 du/ac – well below the maximums authorized under existing zoning and studied in IS/ND No. IP 22-0133 – and would change the designation of several commercial zoning districts and the RP zoning district to the new MX Zone.

The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential future development density. The proposed updates do not grant any land use entitlements, authorize development of any specific development project, or require any direct physical changes to land or existing development.

As noted above, these changes from the project studied in IS/ND IP No. 22-0133 do not result in any changes to any of the resource area conclusions in IS/ND IP No. 22-0133. The proposed Project rezones and establishes a minimum density in certain already developed parcels within unincorporated areas of Orange County. At some point in the future if these parcels are redeveloped, they could have the potential to increase the number of dwelling units. However, at this time, meaningful environmental review cannot be conducted because there is no certainty that redevelopment will occur or to what degree any given parcel will be redeveloped. Planning review with OC Development Services/Planning would still be required for any new development proposed that includes five (5) units or more, even if that development is consistent with the amended GP Elements and Comprehensive ZC. Per the existing ZC, multifamily development projects of five (5) or more dwelling units are permitted subject to a Site Development Permit with a corresponding CEQA review and are reviewed by the Director of OC Development Services/Planning. This requirement would not change as part of the proposed Project. Therefore, the rezone of RP and commercial zoning districts to a new MX zone and rezone of the R2D zone to the R2 or R4 zones are consistent with IS/ND No. IP 22-0133.

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<sup>4</sup> The commercial areas of Silverado Canyon, Costa Mesa Golf Course Parking Lot, and the Ranch at Newport Bay Commercial Center are not included in the proposed Project and will retain their existing zoning of CN – Commercial Neighborhood, C2 – General Business, and C1 – Local Business, respectively.

It was previously determined that there would be no impacts to any environmental resource area as demonstrated in IS/ND IP No. 22-0133. The updates proposed in this Addendum to the amendments would not result in any additional impacts not discussed and analyzed in IS/ND IP No. 22-0133. Based on the foregoing analysis and information, none of the conditions identified in California Environmental Quality Act Guidelines Section 15162 exist that would trigger the need to prepare another environmental documentation to evaluate project impacts or mitigation measures with regard to the proposed Project. Thus, the Addendum is the appropriate mechanism to update the analysis included in IS/ND IP No. 22-0133.