

**Public Review Draft  
CEQA INITIAL STUDY  
NEGATIVE DECLARATION**

**FOR  
HOUSING-RELATED UPDATES TO THE COUNTY OF ORANGE  
GENERAL PLAN AND COMPREHENSIVE ZONING CODE**

**Housing Element Update HE 20-01  
Safety Element Update SE 19-01  
Land Use Element Update LUE 22-01  
Environmental Justice Element EJ 22-01  
Zoning Code Amendment CA 22-01**

***Prepared for:***

**Orange County Planning Commission  
*and*  
Orange County Board of Supervisors**

***Prepared by:***



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

**July 2022**

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**Section 1: Introduction****1.1 Project Title**

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

**1.2 Project Purpose**

This document is an Initial Study/Negative Declaration (IS/ND) for evaluation of potential environmental impacts per the requirements of the California Environmental Quality Act resulting from implementation of the Housing Element Update HE 20-01, Safety Element Update SE 19-01, Land Use Element Update LUE 22-01, Environmental Justice Element EJ 22-01, and Zoning Code Amendment CA 22-01. For purposes of this document, the proposed project will be referred to as the Project or proposed Project.

**1.3 Lead Agency/Project Sponsor Name and Address**

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

Contact Person and Telephone Number:  
Cindy Salazar, Advance Planning Manager  
OC Development Services/Planning  
Telephone: 714.667.8870

**1.4 Intended Uses of Initial Study/Negative Declaration**

The County of Orange is designated the Lead Agency, in accordance with Section 15050 of the CEQA Guidelines. The Lead Agency is the public agency which has the principal responsibility for carrying out or approving a Project which may have significant effects upon the environment.

This IS/ND is an informational document which is intended to inform the County of Orange decision-makers, other responsible or interested agencies, and the general public of the potential environmental effects of the proposed Project. The environmental review process has been established to enable public agencies to evaluate environmental consequences and to examine and implement methods of eliminating or reducing any potentially adverse impacts. While CEQA requires that consideration be given to avoiding environmental damage, the Lead Agency and other responsible agencies must balance adverse environmental effects against other public objectives, including economic and social goals (CEQA Guidelines Section 15021).

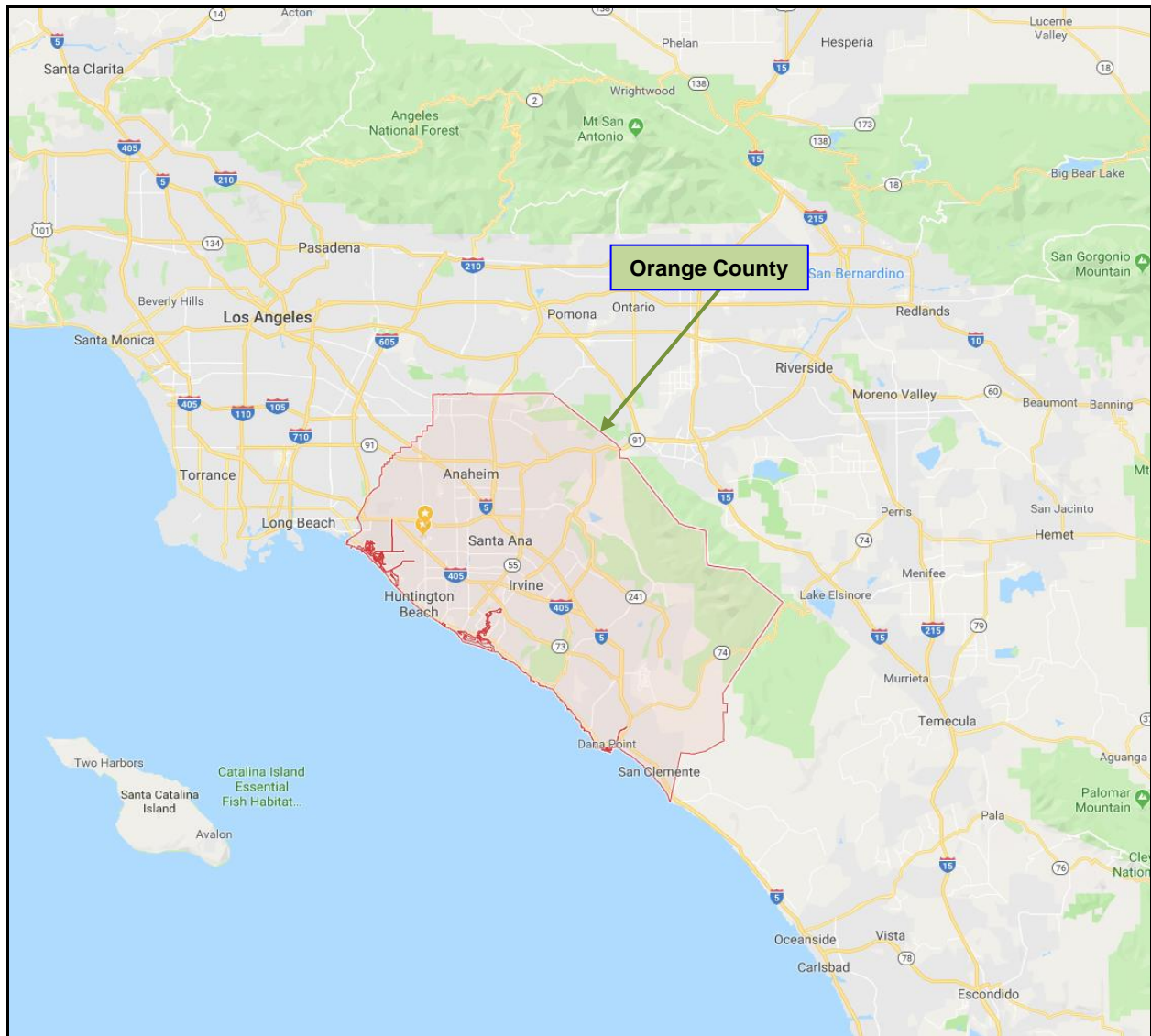
Public Resources Code Section 21080(c)(1) and implementing Guidelines Section 15070(a) states a Negative Declaration can be adopted if it can be determined that the Project will not have a significant effect on the environment. Based on this, the County of Orange, as Lead Agency, has determined that environmental clearance for the proposed Project can be provided with a Negative Declaration.

This IS/ND was prepared in conformance with the California Environmental Quality Act of 1970, as amended (Public Resources Code, Section 21000 *et seq.*); the Guidelines for Implementation of the California Environmental Quality Act (Guidelines), as amended (California Code of Regulations, Title 14, Division 6, Chapter 3, Section 15000, *et seq.*); and the County of Orange 2020 Local CEQA Procedures Manual.

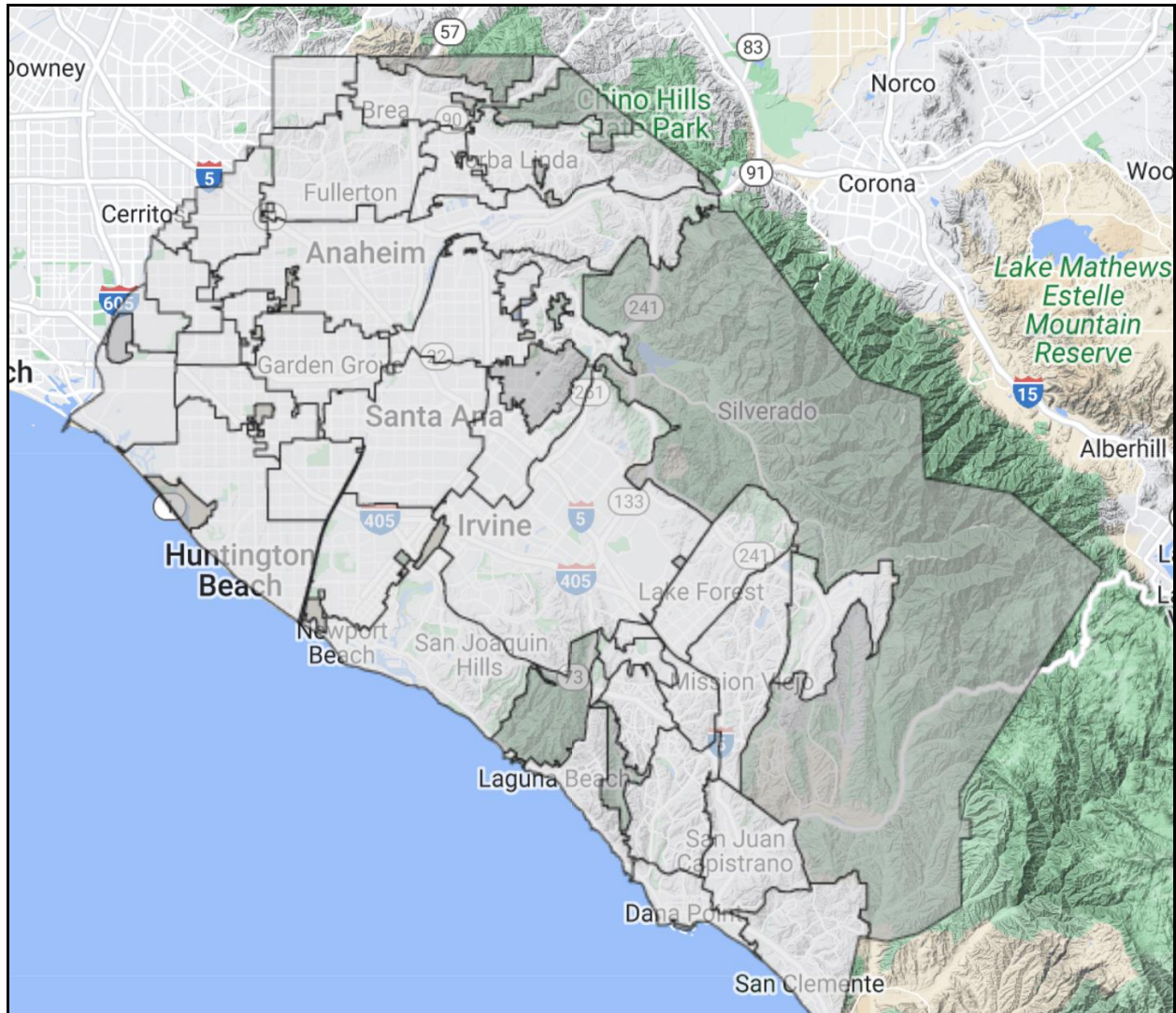
This IS/ND may be inspected from July 12, 2022 through August 10, 2022, Monday through Friday during regular business hours, at OC Development Services/Planning in the County Administrative South Building, 601 North Ross Street, Santa Ana, CA 92701. In addition, this IS/ND is available on the County's website at the following link: <https://ocds.ocpublicworks.com/service-areas/oc-development-services/planning-development/current-projects/all-districts-2>

The Project location includes 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.

### Figure 1: Regional Project Location



**Figure 2: Orange County Unincorporated Areas**



 Unincorporated Areas

 Incorporated Cities



### **1.6 Native American Consultation**

California Native American tribes traditionally and culturally affiliated with the Project area are required to be consulted pursuant to PRC Section 21080.3.1. OC Development Services/Planning sent via US Certified Mail AB 52 Initial Consultation letters AB 52 letters pertaining to the Housing Element and Safety Element on August 11, 2021, to the Kizh Nation, Gabrieleño Tongva San Gabriel Band of Mission Indians, Juaneno Band of Mission Indians, and the Soboba Band of Luiseno Indians. OC Development Services/Planning did not receive any requests for consultation.

### **1.7 Scope of Environmental Analysis**

For evaluation of environmental impacts, each sample question from the Environmental Checklist Form contained in Appendix G of the CEQA Guidelines is stated and responses are provided according to the analysis undertaken as part of the IS/ND.

#### **1.7.1 Thresholds of Significance**

On November 17, 2020, the County adopted “Guidelines for Evaluating Vehicle Miles Traveled under CEQA” (VMT Guidelines), included as Appendix C in the County of Orange 2020 Local CEQA Procedures Manual. The VMT Guidelines included CEQA threshold thresholds of significance for vehicle miles traveled (VMT). Other than the VMT thresholds, the County has not adopted specific thresholds of significance and rather relies upon the specific questions relating to the topical environmental factors listed in Appendix G to the CEQA Guidelines to assist in the determination of whether an identified impact is potentially significant. The County may, depending on the circumstances of a particular project, use specific thresholds of significance on a case-by-case basis as provided by CEQA Guidelines Section 15064.7(b).

#### **1.7.2 Impact Evaluation Methodology**

The environmental impact methodology is described below.

#### ***Changes Not Evaluated***

Construction Impacts – The Project does not authorize development or require physical changes to any existing development or infrastructure that would generate construction-related impacts. Therefore, they are excluded from the environmental analysis.

Indirect Impacts – The CEQA Guidelines require evaluation of indirect or secondary impacts to the environment which are caused by a project and are later in time and farther removed in distance, but are still reasonably foreseeable. Because these impact types must be related to a physical change in the environment and the Project has none, they are excluded from the environmental analysis. Any proposed developments would be individually reviewed to determine if they are exempt from the provisions of CEQA or require environmental review to determine the appropriate level of CEQA review.

Offsite Features – The Guidelines require evaluation of off-site features that are necessary to implement a project, which are typically associated with infrastructure or other physical improvements. Because the Project does not authorize development or require physical changes to any existing development or infrastructure, no offsite features would be required and the need to analyze impacts associated with offsite features would not occur. Therefore, they are excluded from the environmental analysis.

**Changes Evaluated**

Each of the topical environmental issues within each of the topical environmental factors evaluates the potential direct physical impacts to the environmental resources that has the potential to occur Project approval. The following topical environmental factors are evaluated in Section 3 - Environmental Evaluation. The numbers in parentheses represent the section numbers.

- Aesthetics (3.1)
- Agriculture & Forestry Resources (3.2)
- Air Quality (3.3)
- Biological Resources (3.4)
- Cultural Resources/Scientific Resources (3.5)
- Energy (3.6)
- Geology and Soils (3.7)
- Greenhouse Gas Emissions (3.8)
- Hazards & Hazardous Materials (3.9)
- Hydrology & Water Quality (3.10)
- Land Use & Planning (3.11)
- Mineral Resources (3.12)
- Noise (3.13)
- Population & Housing (3.14)
- Public Services (3.15)
- Recreation (3.16)
- Transportation/Traffic (3.17)
- Tribal Cultural Resources (3.18)
- Utilities & Service Systems (3.19)
- Wildfire (3.20)
- Mandatory Findings (3.21)

**1.7.3 Impact Levels**

There are four possible responses to the threshold of significance questions in each of the topical environmental factors in Section 3 - Environmental Evaluation:

1. *No Impact*: No substantial evidence exists that the Project would have a direct primary project-level impact on the environment.
2. *Less Than Significant Impact*: Direct project-level impacts have been identified but are less than the thresholds of significance and do not include or require mitigation measures.
3. *Less Than Significant Impact With Mitigation Incorporated*: Direct project-level impacts have been identified but are less than significant with the incorporation of mitigation measures thereby reducing an impact from Potentially Significant Impact to a Less Than Significant Impact.
4. *Potentially Significant Impact*: Potentially significant direct project-level impacts and have been identified and require preparation of an EIR.

**1.8 Environmental Baseline**

To adequately determine the significance of a potential environmental impact, the environmental baseline must be established. Guidelines Section 15125(a) states in pertinent part that the environmental setting will normally constitute the baseline physical conditions, by which a lead agency will determine if an impact is significant.

Therefore, the environmental baseline for this Project constitutes the existing physical conditions as they currently exist, which represents the time that the environmental process commenced.



**1.9 Environmental Determination**

The following table provides the environmental determination of the Project.

**Table 1: Environmental Determination**

I find that there is no substantial evidence that the project will have a significant effect on the environment, and a <b>NEGATIVE DECLARATION</b> will be prepared.	<input checked="" type="checkbox"/>
I find that although the proposed project could have a significant effect on the environment, revisions to the project or proposals have been made by or agreed to by the project proponent, that will avoid the effects or mitigate the effects to where no significant effects on the environment will occur. A <b>MITIGATED NEGATIVE DECLARATION (MND)</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 (EIR)</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>EIR</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 (ND)</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 (which either mitigated the project or adopted impacts pursuant to findings) adopted/certified pursuant to the 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 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 the CEQA Guidelines. 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).	<input 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 the CEQA Guidelines. However, there is important new information and/or substantial changes have occurred requiring the preparation of an additional CEQA document ( <b>ND</b> , <b>MND</b> or <b>EIR</b> ) pursuant to CEQA Guidelines Sections 15162 through 15163.	<input type="checkbox"/>

Kevin Shannon

Signature

August 11, 2022

Date

Kevin Shannon, Consultant - Environmental Planner

Name

## **Section 2: Project Description**

### **Introduction**

This section provides the project background, location and environmental setting, and the characteristics of the Project.

#### **2.1 Project Background**

In accordance with State law, the County is required to update its Housing Element every eight years. For each eight-year planning cycle, the County is allocated a specific number of housing units (i.e., Regional Housing Needs Assessment (RHNA) allocation). The RHNA quantifies current and future housing needs within a jurisdiction.

The Housing Element establishes the County's official housing policies and programs to accommodate the County's RHNA allocation goals and identifies available candidate housing sites to meet those goals.

In addition to updating the Housing Element, the Land Use Element requires an amendment to maintain internal consistency with the Housing Element. Similarly, the Safety Element requires an amendment when the Housing Element is amended. An Environmental Justice Element is also required to be created when two or more existing General Plan elements are concurrently revised after January 2018. Last, the Zoning Code requires revisions to the existing Housing Opportunities Overlay to maintain consistency with programs included Housing Element Update.

#### **2.2 Project Location and Environmental Setting**

The proposed Project is located within the unincorporated portion of Orange County (refer to Figure 2) and specifically within sites suitable to accommodate the RHNA allocation. The sites may be developed with different land uses consisting of residential, commercial, office, retail, and industrial.

#### **2.3 Project Characteristics**

The Project consists of the following five components. Descriptions of each are provided below.

- 6<sup>th</sup> Cycle Housing Element Update
- Land Use Element Amendment
- Safety Element Amendment
- Environmental Justice Element
- Zoning Code Amendment - Housing Opportunities Overlay District

##### **2.3.1 6<sup>th</sup> Cycle Housing Element Update**

The County of Orange Housing Element establishes policies, procedures, and incentives in its land use planning and development activities that will result in the maintenance and expansion of the housing supply to adequately accommodate households of the current and future population living in the unincorporated County. The Housing Element institutes policies that will guide County decision-making and establishes a Housing Action Plan to implement housing goals through an eight-year planning period. On October 15, 2021, the 5<sup>th</sup> Cycle (2013-2021) planning period ended and the 6<sup>th</sup> Cycle (2021-2029) planning period began.

Although certain County housing programs operate within cities, the County's Housing Element primarily addresses housing needs in the unincorporated areas to meet the various income levels. The County's Housing Element makes provisions for affordable and accessible housing for special needs groups in the community and is designed to provide guidance in the maintenance of existing affordable housing. These commitments are an expression of the statewide housing goal of "decent housing and a suitable living environment for every California family."

The Housing Element Update will include the County's Housing Action Plan, which addresses the County's identified housing needs, and includes goals, policies, and programs concerning housing and housing-related services, and the County's approach to addressing its Regional Housing Needs Assessment (RHNA) allocation, its share of the regional housing need. The 6<sup>th</sup> Cycle (2021-2029) Housing Element Update consists of a comprehensive review and an update to the previous Housing Element, which covered the 5<sup>th</sup> Cycle (2013-2021) planning period.

To satisfy and meet its RHNA allocation, the County completed a parcel-specific land inventory that includes sites capable of accommodating the RHNA allocation of 10,406 units and is included in the land inventory section of the Housing Element. The County is required to identify areas with adequate zoning to accommodate this future growth, however, it is not required to develop these housing units.

The 6<sup>th</sup> Cycle Housing Element Update does not grant any land use entitlements or authorize development of a specific project, nor does it consider candidate housing sites not already zoned for residential development or non-residentially zoned sites that allow residential development with the existing Housing Opportunities Overlay.

### **2.3.2 Land Use Element Amendment**

The County of Orange Land Use Element describes objectives, policies, and land use patterns for the unincorporated area. It also establishes development criteria and standards, including population density and building intensity. Land use categories are used to depict the general distribution, location, and extent of public and private uses of land. The update will include the following proposed revisions:

- The "Land Use Categories" section will be revised to reflect current permitted uses allowed by the County's Zoning Code, such as the Housing Opportunities Overlay District regulations, and 6<sup>th</sup> Cycle Housing Element Update, no new permitted uses will be proposed.
- The "Building Intensity/Population Density Standards" chart (Table III-I) requires an update to reflect current regulations in the County's Zoning Code, no new standards will be proposed.
- The County's land use-related "Objectives and Policies" will be revised to reflect any changes to these that may have been adopted since the previous Land Use Element amendment, no new objectives and policies will be proposed.
- The "Planning Constraints and Deficiencies" section will be revised to ensure internal consistency with the other elements of the County's General Plan including the 6<sup>th</sup> Cycle Housing Element Update.

### **2.3.3 Safety Element Amendment**

The California Government Code requires general plans to include "a safety element for the protection of the community from any unreasonable risks associated with the effects of seismically induced surface rupture, ground shaking, ground failure, tsunami, seiche, and dam failure; slope instability leading to

mudslides and landslides, subsidence and other geologic hazards known to the legislative body; flooding; and wildland and urban fires."

The purpose of the County's Safety Element is to comprehensively inventory hazards which primarily impact persons and property in the unincorporated areas of Orange County. The scope of the Safety Element also allows for a countywide perspective for other safety-related matters. This hazards inventory identifies information necessary for the development of goals, objectives, policies, and implementation programs that will guide and direct local government decision-making in safety-related matters and also foster coordination with regional, state, and federal policies and programs.

An update, or amendment, of the County of Orange Safety Element is required to ensure compliance with California Government Code Section 65302(g)(3). Under this Government Code, upon the next revision to the County's Housing Element, which is currently underway, the Safety Element must be updated to address new statutory considerations regarding the risk of wildland fire in State Responsibility Areas and in Very High Fire Hazard Severity Zones. The update must meet specific requirements including those set forth in the Office of Planning and Research's "Fire Hazard Planning" document and the General Plan Guidelines.

The Safety Element update will: 1) add information regarding existing planned development and agencies responsibilities, 2) revise goals, policies, and objectives that address climate vulnerability and adaptation per Senate Bill 379, 3) revise goals, policies, and objectives as necessary to maintain integrity of essential public facilities, and 4) update the County's hazards inventory. In addition, the Governor's Office of Emergency Services (Cal OES) has established new and specific requirements for incorporation of the County's Hazard Mitigation Plan (HMP) into the Safety Element to maintain the County's eligibility for pre-disaster mitigation funding per Assembly Bill 2140. This will include the addition of a Uniform Resource Locator (URL) pointing readers directly to the County's HMP. The Safety Element update will meet these new Cal OES requirements.

#### **2.3.4 Environmental Justice Element**

The County of Orange will add an Environmental Justice Element to the General Plan pursuant to Government Code Section 65302 (h)(1). This statute requires that upon the adoption or next revision of two or more existing elements concurrently on or after January 1, 2018, counties that have disadvantaged communities shall incorporate environmental justice policies into their general plans, either in a separate Environmental Justice element or by integrating related goals, policies, and objectives throughout the other elements. The County is currently in the process of completing its 6<sup>th</sup> Cycle Housing Element Update and will also be completing an associated amendment to its Land Use Element. These two General Plan amendments trigger the requirement for the County to comply with the statute at this time.

According to the California Environmental Protection Agency (Cal EPA) website, "the aim of Environmental Justice is to lift the unfair burden of pollution from those most vulnerable to its effects." According to the California Office of Environmental Health Hazard Assessment (OEHHA) CalEnviroScreen, versions 3.0 and 4.0, several census tracts that include unincorporated areas have been identified as disadvantaged communities.

The objective of the new Environmental Justice Element is to provide for the fair treatment and meaningful involvement of people of all races, cultures, incomes, and national origins, with respect to

the implementation of environmental laws, regulations, and policies. The new Environmental Justice Element will include goals, policies, and programs to address environmental justice. This will include ensuring the opportunity for meaningful participation in the public process, minimizing to the extent feasible exposure of residents to pollution in the environment, increasing mobility and accessibility for all residents, and reviewing opportunities for affordable housing from an environmental justice perspective.

### **2.3.5 Orange County Zoning Code Amendment**

The purpose of the Housing Opportunities Overlay District (HOO) Regulations, Zoning Code section 7-9-44, is to increase the number of sites available for the development of affordable housing, emergency shelters, and multi-service centers in the unincorporated area. The HOO was adopted by the Board of Supervisors on January 10, 2006, and amended in 2008 and 2013 to increase the number of eligible sites. The intent of the HOO is to facilitate the development of affordable housing within commercial, industrial, and select high-density zoned sites. The HOO Regulations allow eligible projects to be constructed in commercial, industrial, and certain high-density residential areas. All residential projects developed under the HOO Regulations are eligible to take advantage of the State Density Bonus Law to increase the allowable density on the development site and to receive up to three incentives (waiver of site development standards) that are intended to make the development more economically feasible.

The Housing Opportunities Overlay allow eligible development in the following zoning districts:

- C1 – “Local Business”
- C2 – “General Business”
- CC – “Commercial Community “
- CH – “Commercial Highway “
- R2 – “Multi-Family Dwellings “
- R3 – “Apartment “
- CN – “Commercial Neighborhood “
- PA – “Professional & Administrative Office “
- M1 – “Light Industrial “
- R4 – “Suburban Multi-Family Residential”
- RP – “Residential-Professional “

The HOO Regulations currently applies a base density of 43 units per acre on affordable housing projects located within the commercial and industrial zoning districts of the HOO. These projects may request an increase in density either under the provisions of the County’s Zoning Code or State Density Bonus Law. The intended target population for the affordable housing development will determine the percentage of a density bonus the project is eligible for. Applying the Zoning Code provisions could result in up to a maximum of a 45% density bonus, or 63 units per acre. Applying the State Density Bonus Law could result in up to an 80% increase in density, or 78 units per acre. Affordable housing projects located in high-density residential areas are subject to the base density for that zoning district but would also be eligible for a density bonus.

The proposed revisions to the HOO Regulations would:

- Increase the base density applied to eligible affordable housing projects within commercial and industrial zoning districts from 43 units per acre, up to 70 units per acre.

- Apply the base density of up to 70 units per acre to all eligible affordable housing projects within high-density residential zoning districts, regardless of the maximum density of the underlying district.
- All high-density zoned residential sites located within the City of Costa Mesa Sphere of Influence are specifically excluded.

The increased base density applied to eligible affordable housing projects is intended to facilitate the development of affordable housing, one of the County's goals set forth in its Housing Element.

## 2.4 Project Approvals

Following the completion of the mandatory public review period, the proposed Housing Element and amendments would be scheduled for a public hearing before the Orange County Planning Commission followed by the Orange County Board of Supervisors. The Planning Commission will review the IS/ND with the proposed amendments and provide a recommendation to the Board of Supervisors. The following table provides the public agency approvals.

**Table 2: Public Agency Approvals**

Entity	Action
Planning Commission	<ul style="list-style-type: none"> <li>• Provide Recommendation that the Board of Supervisors Adopt the IS/ND</li> <li>• Provide Recommendation that the Board of Supervisors Approve the Housing Element Update HE 20-01, Safety Element Update SE 19-01, Land Use Element Update LUE 22-01, Environmental Justice Element EJ 22-01, and Zoning Code Amendment CA 22-01</li> </ul>
Board of Supervisors	<ul style="list-style-type: none"> <li>• Adopt IS/ND</li> <li>• Approve Housing Element Update HE 20-01, Safety Element Update SE 19-01, Land Use Element Update LUE 22-01, Environmental Justice Element EJ 22-01, and Zoning Code Amendment CA 22-01</li> </ul>
Department of Housing and Community Development	<ul style="list-style-type: none"> <li>• Determine the Housing Element is substantially compliant with state housing element law</li> </ul>
Board of Forestry and Fire Protection	<ul style="list-style-type: none"> <li>• Review revised Safety Element and provides written comments</li> </ul>

Source: OC Public Works, Development Services/Planning, June 2022.

## Section 3: Environmental Evaluation

3.1 Aesthetics	Potentially Significant Impact	Less than Significant With Mitigation	Less than Significant Impact	No Impact
<i>Would the project:</i>				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Response to Impact Questions (a - d):** The Project implements a policy framework necessary to meet housing needs on sites suitable to accommodate the 6<sup>th</sup> cycle RHNA allocation through housing-related amendments to the County of Orange General Plan Elements and Comprehensive Zoning Code. Sites suitable for eligible projects occur within residential, commercial, and industrial zoning districts (refer to Section 2.5). The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential development density. For eligible affordable housing projects located in the commercial and industrial zoning districts, the base density would be increased from 43 up to 70 units per acre. In high-density residential zoning districts, a base density of up to 70 units per acre would be applied regardless of the maximum density of the underlying base zoning district.

Project implementation does not grant any land use entitlements, authorize development of any specific development project, change base zoning districts, or require any direct physical changes to land or existing development. Therefore, because no substantial evidence exists of a direct primary Project-level impact, no impacts related to the four threshold questions specific to Aesthetics would result.

Although the amendments have the potential to increase the density on certain sites within unincorporated areas, at this time, meaningful environmental review cannot be conducted because there is no certainty that the development will occur or to what degree any given parcel will be developed. Should development be proposed on any of the sites, a planning review with OC Development Services/Planning would be required.

**Mitigation Measures:** No mitigation measures are either required or necessary.



**Impact Conclusion:** No direct or indirect impacts would result from Project implementation. Therefore, the project would have no impact on Aesthetics.

**References**

California Department of Transportation (Caltrans). 2018. California Scenic Highway Mapping System – Orange County. Accessed online:  
[http://www.dot.ca.gov/hq/LandArch/16\\_livability/scenic\\_highways/index.htm](http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm)

Orange, County of. General Plan, Scenic Highway Plan. 2005

3.2 Agriculture and Forestry Resources	Potentially Significant Impact	Less than Significant With Mitigation	Less than Significant Impact	No Impact
<i>Would the project:</i>				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code 12220 (g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51004(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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 forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Response to Impact Questions (a – e):** The Project implements a policy framework necessary to meet housing needs on sites suitable to accommodate the 6th cycle RHNA allocation through housing-related amendments to the County of Orange General Plan Elements and Comprehensive Zoning Code. Sites suitable for eligible projects occur within residential, commercial, and industrial zoning districts (refer to Section 2.5). The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential development density. For eligible affordable housing projects located in the commercial and industrial zoning districts, the base density would be increased from 43 up to 70 units per acre. In high-density residential zoning districts, a base density of up to 70 units per acre would be applied regardless of the maximum density of the underlying base zoning district.

Project implementation does not grant any land use entitlements, authorize development of any specific development project, change base zoning districts, or require any direct physical changes to land or existing development. Therefore, because no substantial evidence exists of a direct primary Project-level impact, no impacts related to the five threshold questions specific to Agriculture and Forestry Resources would result.

Although the amendments have the potential to increase the density on certain sites within unincorporated areas, at this time, meaningful environmental review cannot be conducted because there is no certainty that the development will occur or to what degree any given parcel will be developed. Should development be proposed on any of the sites, a planning review with OC Development Services/Planning would be required.

**Mitigation Measures:** No mitigation measures are either required or necessary.

**Impact Conclusion:** No direct or indirect impacts would result from Project implementation. Therefore, the project would have no impact on Agriculture and Forestry Resources.

#### **References**

Orange, County of. General Plan, Resources Element. 2012

Department of Agriculture, U.S. 2012 Census of Agriculture.

<b>3.3 Air Quality</b>	<b>Potentially Significant Impact</b>	<b>Less than Significant With Mitigation</b>	<b>Less than Significant Impact</b>	<b>No Impact</b>
<i>Would the project:</i>				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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 (including releasing emissions, which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Response to Impact Questions (a – e):** The Project implements a policy framework necessary to meet housing needs on sites suitable to accommodate the 6th cycle RHNA allocation through housing-related amendments to the County of Orange General Plan Elements and Comprehensive Zoning Code. Sites suitable for eligible projects occur within residential, commercial, and industrial zoning districts (refer to Section 2.5).

The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential development density. For eligible affordable housing projects located in the commercial and industrial zoning districts, the base density would be increased from 43 up to 70 units per acre. In high-density residential zoning districts, a base density of up to 70 units per acre would be applied regardless of the maximum density of the underlying base zoning district.

Project implementation does not grant any land use entitlements, authorize development of any specific development project, change base zoning districts, or require any direct physical changes to land or existing development. Therefore, because no substantial evidence exists of a direct primary Project-level impact, no impacts related to the five threshold questions specific to Air Quality would result.

Although the amendments have the potential to increase the density on certain sites within unincorporated areas, at this time, meaningful environmental review cannot be conducted because

there is no certainty that the development will occur or to what degree any given parcel will be developed. Should development be proposed on any of the sites, a planning review with OC Development Services/Planning would be required.

**Mitigation Measures:** No mitigation measures are either required or necessary.

**Impact Conclusion:** No direct or indirect impacts would result from Project implementation. Therefore, the project would have no impact on Air Quality.

**References**

Orange, County of. Draft Housing Element Update HE 20-01, Draft Safety Element Update SE 19-01, Draft Land Use Element Update LUE 22-01, Draft Environmental Justice Element EJ 22-01, and draft Zoning Code Amendment CA 22-01

South Coast Air Quality Management District. 2016 Air Quality Management Plan (Final). December 2016.

<b>3.4 Biological Resources</b>	<b>Potentially Significant Impact</b>	<b>Less than Significant With Mitigation</b>	<b>Less than Significant Impact</b>	<b>No Impact</b>
<i>Would the project:</i>				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Response to Impact Questions (a – f):** The Project implements a policy framework necessary to meet housing needs on sites suitable to accommodate the 6th cycle RHNA allocation through housing-related amendments to the County of Orange General Plan Elements and Comprehensive Zoning Code. Sites suitable for eligible projects occur within residential, commercial, and industrial zoning districts (refer to Section 2.5). The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential development density. For eligible affordable housing projects located in the commercial and industrial zoning districts, the base density would be increased from 43 up to 70 units per acre. In high-density residential zoning districts, a base density of up to 70 units per acre would be applied regardless of the maximum density of the underlying base zoning district.

Project implementation does not grant any land use entitlements, authorize development of any specific development project, change base zoning districts, or require any direct physical changes to land or existing development. Therefore, because no substantial evidence exists of a direct primary Project-level impact, no impacts related to the six threshold questions specific to Biological Resources would result.

Although the amendments have the potential to increase the density on certain sites within unincorporated areas, at this time, meaningful environmental review cannot be conducted because there is no certainty that the development will occur or to what degree any given parcel will be developed. Should development be proposed on any of the sites, a planning review with OC Development Services/Planning would be required.

**Mitigation Measures:** No mitigation measures are either required or necessary.

**Impact Conclusion:** No direct or indirect impacts would result from Project implementation. Therefore, the project would have no impact on Biological Resources.

#### **References**

Orange, County of. Natural Community Conservation Plan & Habitat Conservation Plan. July 1996.



3.5 Cultural Resources	Potentially Significant Impact	Less than Significant With Mitigation	Less than Significant Impact	No Impact
<i>Would the project:</i>				
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Response to Impact Questions (a - d):** The Project implements a policy framework necessary to meet housing needs on sites suitable to accommodate the 6th cycle RHNA allocation through housing-related amendments to the County of Orange General Plan Elements and Comprehensive Zoning Code. Sites suitable for eligible projects occur within residential, commercial, and industrial zoning districts (refer to Section 2.5). The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential development density. For eligible affordable housing projects located in the commercial and industrial zoning districts, the base density would be increased from 43 up to 70 units per acre. In high-density residential zoning districts, a base density of up to 70 units per acre would be applied regardless of the maximum density of the underlying base zoning district.

Project implementation does not grant any land use entitlements, authorize development of any specific development project, change base zoning districts, or require any direct physical changes to land or existing development. Therefore, because no substantial evidence exists of a direct primary Project-level impact, no impacts related to the four threshold questions specific to Cultural Resources would result.

Although the amendments have the potential to increase the density on certain sites within unincorporated areas, at this time, meaningful environmental review cannot be conducted because there is no certainty that the development will occur or to what degree any given parcel will be developed. Should development be proposed on any of the sites, a planning review with OC Development Services/Planning would be required.

**Mitigation Measures:** No mitigation measures are either required or necessary.

**Impact Conclusion:** No direct or indirect impacts would result from Project implementation. Therefore, the project would have no impact on Cultural Resources.

**References**

Orange, County of. General Plan, Resources Element. 2013

\_\_\_\_\_. General Plan, Land Use Element. 2015

3.6 Energy	Potentially Significant Impact	Less than Significant With Mitigation	Less than Significant Impact	No Impact
<i>Would the project:</i>				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Response to Impact Questions (a and b):** The Project implements a policy framework necessary to meet housing needs on sites suitable to accommodate the 6th cycle RHNA allocation through housing-related amendments to the County of Orange General Plan Elements and Comprehensive Zoning Code. Sites suitable for eligible projects occur within residential, commercial, and industrial zoning districts (refer to Section 2.5). The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential development density. For eligible affordable housing projects located in the commercial and industrial zoning districts, the base density would be increased from 43 up to 70 units per acre. In high-density residential zoning districts, a base density of up to 70 units per acre would be applied regardless of the maximum density of the underlying base zoning district.

Project implementation does not grant any land use entitlements, authorize development of any specific development project, change base zoning districts, or require any direct physical changes to land or existing development. Therefore, because no substantial evidence exists of a direct primary Project-level impact, no impacts related to the two threshold questions specific to Energy would result.

Although the amendments have the potential to increase the density on certain sites within unincorporated areas, at this time, meaningful environmental review cannot be conducted because there is no certainty that the development will occur or to what degree any given parcel will be developed. Should development be proposed on any of the sites, a planning review with OC Development Services/Planning would be required.

**Mitigation Measures:** No mitigation measures are either required or necessary.

**Impact Conclusion:** No direct or indirect impacts would result from Project implementation. Therefore, the project would have no impact on Energy.

#### References

No references are associated with this topic.

<b>3.7 Geology and Soils</b>	<b>Potentially Significant Impact</b>	<b>Less than Significant With Mitigation</b>	<b>Less than Significant Impact</b>	<b>No Impact</b>
<i>Would the project:</i>				
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.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:  ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:  iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:  iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal system where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Response to Impact Questions (a - e):** The Project implements a policy framework necessary to meet housing needs on sites suitable to accommodate the 6th cycle RHNA allocation through housing-related amendments to the County of Orange General Plan Elements and Comprehensive Zoning Code. Sites suitable for eligible projects occur within residential, commercial, and industrial zoning districts (refer to Section 2.5). The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential development density. For eligible affordable housing projects located in the commercial and industrial zoning districts, the base density would be increased from 43 up to 70 units per acre. In high-density residential zoning districts, a base density of up to 70 units per acre would be applied regardless of the maximum density of the underlying base zoning district.

Project implementation does not grant any land use entitlements, authorize development of any specific development project, change base zoning districts, or require any direct physical changes to land or existing development. Therefore, because no substantial evidence exists of a direct primary Project-level impact, no impacts related to the five threshold questions specific to Geology and Soils would result.

Although the amendments have the potential to increase the density on certain sites within unincorporated areas, at this time, meaningful environmental review cannot be conducted because there is no certainty that the development will occur or to what degree any given parcel will be developed. Should development be proposed on any of the sites, a planning review with OC Development Services/Planning would be required.

**Mitigation Measures:** No mitigation measures are either required or necessary.

**Impact Conclusion:** No direct or indirect impacts would result from Project implementation. Therefore, the project would have no impact on Geology and Soils.

## References

Orange, County of. General Plan, Safety Element. 2013

\_\_\_\_\_. General Plan, Land Use Element. 2015

3.8 Greenhouse Gas Emissions	Potentially Significant Impact	Less than Significant With Mitigation	Less than Significant Impact	No Impact
<i>Would the project:</i>				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Response to Impact Questions (a and b):** The Project implements a policy framework necessary to meet housing needs on sites suitable to accommodate the 6th cycle RHNA allocation through housing-related amendments to the County of Orange General Plan Elements and Comprehensive Zoning Code. Sites suitable for eligible projects occur within residential, commercial, and industrial zoning districts (refer to Section 2.5). The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential development density. For eligible affordable housing projects located in the commercial and industrial zoning districts, the base density would be increased from 43 up to 70 units per acre. In high-density residential zoning districts, a base density of up to 70 units per acre would be applied regardless of the maximum density of the underlying base zoning district.

Project implementation does not grant any land use entitlements, authorize development of any specific development project, change base zoning districts, or require any direct physical changes to land or existing development. Therefore, because no substantial evidence exists of a direct primary Project-level impact, no impacts related to the two threshold questions specific to Greenhouse Gas Emissions would result.

Although the amendments have the potential to increase the density on certain sites within unincorporated areas, at this time, meaningful environmental review cannot be conducted because there is no certainty that the development will occur or to what degree any given parcel will be developed. Should development be proposed on any of the sites, a planning review with OC Development Services/Planning would be required.

**Mitigation Measures:** No mitigation measures are either required or necessary.

**Impact Conclusion:** No direct or indirect impacts would result from Project implementation. Therefore, the project would have no impact on Greenhouse Gas Emissions.

#### References

California Air Pollution Control Officers Association.

South Coast Air Quality Management District. Final Draft 2016 Air Quality Management Plan. December 2016.



3.9 Hazards and Hazardous Materials	Potentially Significant Impact	Less than Significant With Mitigation	Less than Significant Impact	No Impact
<i>Would the project:</i>				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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**Response to Impact Question (a - h):** The Project implements a policy framework necessary to meet housing needs on sites suitable to accommodate the 6th cycle RHNA allocation through housing-related amendments to the County of Orange General Plan Elements and Comprehensive Zoning Code. Sites suitable for eligible projects occur within residential, commercial, and industrial zoning districts (refer to Section 2.5). The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential development density. For eligible affordable housing projects located in the commercial and industrial zoning districts, the base density would be increased from 43 up to 70 units per acre. In high-density residential zoning districts, a base density of up to 70 units per acre would be applied regardless of the maximum density of the underlying base zoning district. In addition, Project implementation updates the County's hazards inventory and integrates the County's Hazard Mitigation Plan into the Safety Element (refer to Section 2.3.3).

Project implementation does not grant any land use entitlements, authorize development of any specific development project, change base zoning districts, or require any direct physical changes to land or existing development. Therefore, because no substantial evidence exists of a direct primary Project-level impact, no impacts related to the eight threshold questions specific to Hazards and Hazardous Materials would result.

Although the amendments have the potential to increase the density on certain sites within unincorporated areas, at this time, meaningful environmental review cannot be conducted because there is no certainty that the development will occur or to what degree any given parcel will be developed. Should development be proposed on any of the sites, a planning review with OC Development Services/Planning would be required.

**Mitigation Measures:** No mitigation measures are either required or necessary.

**Impact Conclusion:** No direct or indirect impacts would result from Project implementation. Therefore, the project would have no impact on Hazards and Hazardous Materials.

## References

Orange, County of. General Plan, Land Use Element. 2015

\_\_\_\_\_. Health Care Agency, Environmental Health Division.

\_\_\_\_\_. Airport Land Use Commission.

Orange County Fire Authority

<b>3.10 Hydrology and Water Quality</b>	<b>Potentially Significant Impact</b>	<b>Less than Significant With Mitigation</b>	<b>Less than Significant Impact</b>	<b>No Impact</b>
<i>Would the project:</i>				
a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Place within a 100-year flood hazard area structures, which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j) Would the project [result in] inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Response to Impact Questions (a - j):** The Project implements a policy framework necessary to meet housing needs on sites suitable to accommodate the 6th cycle RHNA allocation through housing-related amendments to the County of Orange General Plan Elements and Comprehensive Zoning Code. Sites suitable for eligible projects occur within residential, commercial, and industrial zoning districts (refer to Section 2.5). The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential development density. For eligible affordable housing projects located in the commercial and industrial zoning districts, the base density would be increased from 43 up to 70 units per acre. In high-density residential zoning districts, a base density of up to 70 units per acre would be applied regardless of the maximum density of the underlying base zoning district.

Project implementation does not grant any land use entitlements, authorize development of any specific development project, change base zoning districts, or require any direct physical changes to land or existing development. Therefore, because no substantial evidence exists of a direct primary Project-level impact, no impacts related to the ten threshold questions specific to Hydrology and Water Quality would result.

Although the amendments have the potential to increase the density on certain sites within unincorporated areas, at this time, meaningful environmental review cannot be conducted because there is no certainty that the development will occur or to what degree any given parcel will be developed. Should development be proposed on any of the sites, a planning review with OC Development Services/Planning would be required.

**Mitigation Measures:** No mitigation measures are either required or necessary.

**Impact Conclusion:** No direct or indirect impacts would result from Project implementation. Therefore, the project would have no impact on Hydrology and Water Quality.

**References**

Orange, County of. General Plan, Public Services and Facilities Element. 2012

\_\_\_\_\_. General Plan, Land Use Element. 2015

<b>3.11 Land Use and Planning</b>	<b>Potentially Significant Impact</b>	<b>Less than Significant With Mitigation</b>	<b>Less than Significant Impact</b>	<b>No Impact</b>
<i>Would the project:</i>				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Response to Impact Questions (a - c):** The Project implements a policy framework necessary to meet housing needs on sites suitable to accommodate the 6th cycle RHNA allocation through housing-related amendments to the County of Orange General Plan Elements and Comprehensive Zoning Code. Sites suitable for eligible projects occur within residential, commercial, and industrial zoning districts (refer to Section 2.5). The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential development density. For eligible affordable housing projects located in the commercial and industrial zoning districts, the base density would be increased from 43 up to 70 units per acre. In high-density residential zoning districts, a base density of up to 70 units per acre would be applied regardless of the maximum density of the underlying base zoning district. In addition, Project implementation updates the Land Use Element to revise the Land Use Categories list, Table III-I to reflect current regulations in the County Zoning Code, revise Objectives and Policies, and revise the Planning and Deficiencies section (refer to Section 2.3.2) to ensure consistency in all plans and zoning documents.

Project implementation does not grant any land use entitlements, authorize development of any specific development project, change base zoning districts, or require any direct physical changes to land or existing development. Therefore, because no substantial evidence exists of a direct primary Project-level impact, no impacts related to the three threshold questions specific to Land Use and Planning would result.

Although the amendments have the potential to increase the density on certain sites within unincorporated areas, at this time, meaningful environmental review cannot be conducted because there is no certainty that the development will occur or to what degree any given parcel will be developed. Should development be proposed on any of the sites, a planning review with OC Development Services/Planning would be required.

**Mitigation Measures:** No mitigation measures are either required or necessary.

**Impact Conclusion:** No direct or indirect impacts would result from Project implementation. Therefore, the project would have no impact on Land Use and Planning.

### **3.10.3 References**

Orange, County of. General Plan, Land Use Element. 2015



3.12 Mineral Resources	Potentially Significant Impact	Less than Significant With Mitigation	Less than Significant Impact	No Impact
<i>Would the project:</i>				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Response to Impact Questions (a and b):** The Project implements a policy framework necessary to meet housing needs on sites suitable to accommodate the 6th cycle RHNA allocation through housing-related amendments to the County of Orange General Plan Elements and Comprehensive Zoning Code. Sites suitable for eligible projects occur within residential, commercial, and industrial zoning districts (refer to Section 2.5).

The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential development density. For eligible affordable housing projects located in the commercial and industrial zoning districts, the base density would be increased from 43 up to 70 units per acre. In high-density residential zoning districts, a base density of up to 70 units per acre would be applied regardless of the maximum density of the underlying base zoning district.

Project implementation does not grant any land use entitlements, authorize development of any specific development project, change base zoning districts, or require any direct physical changes to land or existing development. Therefore, because no substantial evidence exists of a direct primary Project-level impact, no impacts related to the two threshold questions specific to Mineral Resources would result.

Although the amendments have the potential to increase the density on certain sites within unincorporated areas, at this time, meaningful environmental review cannot be conducted because there is no certainty that the development will occur or to what degree any given parcel will be developed. Should development be proposed on any of the sites, a planning review with OC Development Services/Planning would be required.

**Mitigation Measures:** No mitigation measures are either required or necessary.

**Impact Conclusion:** No direct or indirect impacts would result from Project implementation. Therefore, the project would have no impact on Mineral Resources.

#### References

Orange, County of. General Plan, Resources Element. 2013

<b>3.13 Noise</b>	<b>Potentially Significant Impact</b>	<b>Less than Significant With Mitigation</b>	<b>Less than Significant Impact</b>	<b>No Impact</b>
<i>Would the project:</i>				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Response to Impact Questions (a - f):** The Project implements a policy framework necessary to meet housing needs on sites suitable to accommodate the 6th cycle RHNA allocation through housing-related amendments to the County of Orange General Plan Elements and Comprehensive Zoning Code. Sites suitable for eligible projects occur within residential, commercial, and industrial zoning districts (refer to Section 2.5). The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential development density. For eligible affordable housing projects located in the commercial and industrial zoning districts, the base density would be increased from 43 up to 70 units per acre. In high-density residential zoning districts, a base density of up to 70

units per acre would be applied regardless of the maximum density of the underlying base zoning district.

Project implementation does not grant any land use entitlements, authorize development of any specific development project, change base zoning districts, or require any direct physical changes to land or existing development. Therefore, because no substantial evidence exists of a direct primary Project-level impact, no impacts related to the six threshold questions specific to Noise would result.

Although the amendments have the potential to increase the density on certain sites within unincorporated areas, at this time, meaningful environmental review cannot be conducted because there is no certainty that the development will occur or to what degree any given parcel will be developed. Should development be proposed on any of the sites, a planning review with OC Development Services/Planning would be required.

**Mitigation Measures:** No mitigation measures are either required or necessary.

**Impact Conclusion:** No direct or indirect impacts would result from Project implementation. Therefore, the project would have no impact on Noise.

#### **References**

Orange, County of. General Plan, Noise Element. 2012

3.14 Population and Housing	Potentially Significant Impact	Less than Significant With Mitigation	Less than Significant Impact	No Impact
<i>Would the project:</i>				
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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Response to Impact Questions (a - c):** The Project implements a policy framework necessary to meet housing needs on sites suitable to accommodate the 6th cycle RHNA allocation through housing-related amendments to the County of Orange General Plan Elements and Comprehensive Zoning Code. Sites suitable for eligible projects occur within residential, commercial, and industrial zoning districts (refer to Section 2.5).

The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential development density. For eligible affordable housing projects located in the commercial and industrial zoning districts, the base density would be increased from 43 up to 70 units per acre. In high-density residential zoning districts, a base density of up to 70 units per acre would be applied regardless of the maximum density of the underlying base zoning district.

Project implementation does not grant any land use entitlements, authorize development of any specific development project, change base zoning districts, or require any direct physical changes to land or existing development. Therefore, because no substantial evidence exists of a direct primary Project-level impact or induced population growth, no impacts related to the three threshold questions specific to Population and Housing would result.

Although the amendments have the potential to increase the density on certain sites within unincorporated areas, at this time, meaningful environmental review cannot be conducted because there is no certainty that the development will occur or to what degree any given parcel will be developed. Should development be proposed on any of the sites, a planning review with OC Development Services/Planning would be required.

**Mitigation Measures:** No mitigation measures are either required or necessary.

**Impact Conclusion:** No direct or indirect impacts would result from Project implementation. Therefore, the project would have no impact on Population and Housing.

**References**

Orange, County of. General Plan, Housing Element. 2013

3.15 Public Services	Potentially Significant Impact	Less than Significant With Mitigation	Less than Significant Impact	No Impact
<i>Would the project:</i>				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Impact Conclusion: i) Fire protection	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Impact Conclusion: ii) Police protection	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Impact Conclusion: iii) Schools	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Impact Conclusion: iv) Parks	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Impact Conclusion: v) Other public facilities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Response to Impact Questions (ai - aiv):** The Project implements a policy framework necessary to meet housing needs on sites suitable to accommodate the 6th cycle RHNA allocation through housing-related amendments to the County of Orange General Plan Elements and Comprehensive Zoning Code. Sites suitable for eligible projects occur within residential, commercial, and industrial zoning districts (refer to Section 2.5). The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential development density. For eligible affordable housing projects located in the commercial and industrial zoning districts, the base density would be increased from 43 up to 70 units per acre. In high-density residential zoning districts, a base density of up to 70 units per acre would be applied regardless of the maximum density of the underlying base zoning district.

Project implementation does not grant any land use entitlements, authorize development of any specific development project, change base zoning districts, or require any direct physical changes to land or existing development. Therefore, because no substantial evidence exists of a direct primary Project-level impact, no impacts related to the five threshold questions specific to Public Services would result.

Although the amendments have the potential to increase the density on certain sites within unincorporated areas, at this time, meaningful environmental review cannot be conducted because there is no certainty that the development will occur or to what degree any given parcel will be developed. Should development be proposed on any of the sites, a planning review with OC Development Services/Planning would be required.

**Mitigation Measures:** No mitigation measures are either required or necessary.

**Impact Conclusion:** No direct or indirect impacts would result from Project implementation. Therefore, the project would have no impact on Public Services.

#### **References**

Orange, County of. General Plan, Public Services & Facilities Element. 2012

Orange, County of. General Plan, Recreation Element. 2012

3.16 Recreation	Potentially Significant Impact	Less than Significant With Mitigation	Less than Significant Impact	No Impact
<i>Would the project:</i>				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Response to Impact Questions (a and b):** The Project implements a policy framework necessary to meet housing needs on sites suitable to accommodate the 6th cycle RHNA allocation through housing-related amendments to the County of Orange General Plan Elements and Comprehensive Zoning Code. Sites suitable for eligible projects occur within residential, commercial, and industrial zoning districts (refer to Section 2.5). The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential development density. For eligible affordable housing projects located in the commercial and industrial zoning districts, the base density would be increased from 43 up to 70 units per acre. In high-density residential zoning districts, a base density of up to 70 units per acre would be applied regardless of the maximum density of the underlying base zoning district.

Project implementation does not grant any land use entitlements, authorize development of any specific development project, change base zoning districts, or require any direct physical changes to land or existing development. Therefore, because no substantial evidence exists of a direct primary Project-level impact, no impacts related to the two threshold questions specific to Recreation would result.

Although the amendments have the potential to increase the density on certain sites within unincorporated areas, at this time, meaningful environmental review cannot be conducted because there is no certainty that the development will occur or to what degree any given parcel will be developed. Should development be proposed on any of the sites, a planning review with OC Development Services/Planning would be required.

**Mitigation Measures:** No mitigation measures are either required or necessary.

**Impact Conclusion:** No direct or indirect impacts would result from Project implementation. Therefore, the project would have no impact on Recreation.

#### References

Orange, County of. General Plan, Public Services & Facilities Element. 2012



\_\_\_\_\_. General Plan, Recreation Element. 2012

<b>3.17 Transportation/Traffic</b>	<b>Potentially Significant Impact</b>	<b>Less than Significant With Mitigation</b>	<b>Less than Significant Impact</b>	<b>No Impact</b>
<i>Would the project:</i>				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Response to Impact Questions (a - f):** The Project implements a policy framework necessary to meet housing needs on sites suitable to accommodate the 6th cycle RHNA allocation through housing-related amendments to the County of Orange General Plan Elements and Comprehensive Zoning Code. Sites suitable for eligible projects occur within residential, commercial, and industrial zoning districts (refer to

Section 2.5). The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential development density. For eligible affordable housing projects located in the commercial and industrial zoning districts, the base density would be increased from 43 up to 70 units per acre. In high-density residential zoning districts, a base density of up to 70 units per acre would be applied regardless of the maximum density of the underlying base zoning district.

Project implementation does not grant any land use entitlements, authorize development of any specific development project, change base zoning districts, or require any direct physical changes to land or existing development. Therefore, because no substantial evidence exists of a direct primary Project-level impact, no impacts related to the six threshold questions specific to Transportation/Traffic would result.

Although the amendments have the potential to increase the density on certain sites within unincorporated areas, at this time, meaningful environmental review cannot be conducted because there is no certainty that the development will occur or to what degree any given parcel will be developed. Should development be proposed on any of the sites, a planning review with OC Development Services/Planning would be required.

**Mitigation Measures:** No mitigation measures are either required or necessary.

**Impact Conclusion:** No direct or indirect impacts would result from Project implementation. Therefore, the project would have no impact on Transportation/Traffic.

#### **References**

Orange, County of. General Plan, Transportation Element. 2012

3.18 Tribal Cultural Resources	Potentially Significant Impact	Less than Significant With Mitigation	Less than Significant Impact	No Impact
<i>Would the project:</i>				
<p>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:</p> <p>a) 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)?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>b) 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?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Response to Impact Questions (a and b):** The Project implements a policy framework necessary to meet housing needs on sites suitable to accommodate the 6th cycle RHNA allocation through housing-related amendments to the County of Orange General Plan Elements and Comprehensive Zoning Code. Sites suitable for eligible projects occur within residential, commercial, and industrial zoning districts (refer to Section 2.5). The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential development density. For eligible affordable housing projects located in the commercial and industrial zoning districts, the base density would be increased from 43 up to 70 units per acre. In high-density residential zoning districts, a base density of up to 70 units per acre would be applied regardless of the maximum density of the underlying base zoning district.

Project implementation does not grant any land use entitlements, authorize development of any specific development project, change base zoning districts, or require any direct physical changes to land or existing development. Therefore, because no substantial evidence exists of a direct primary Project-level

impact, no impacts related to the four threshold questions specific to Aesthetics would result. Refer to Section 1.6 that discusses Tribal consultation.

Although the amendments have the potential to increase the density on certain sites within unincorporated areas, at this time, meaningful environmental review cannot be conducted because there is no certainty that the development will occur or to what degree any given parcel will be developed. Should development be proposed on any of the sites, a planning review with OC Development Services/Planning would be required.

**Mitigation Measures:** No mitigation measures are either required or necessary.

**Impact Conclusion:** No direct or indirect impacts would result from Project implementation. Therefore, the project would have no impact on Tribal Cultural Resources.

#### **References**

No references are associated with this topic.

<b>3.19 Utilities and Service Systems</b>	<b>Potentially Significant Impact</b>	<b>Less than Significant With Mitigation</b>	<b>Less than Significant Impact</b>	<b>No Impact</b>
<i>Would the project:</i>				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Response to Impact Questions (a - g):** The Project implements a policy framework necessary to meet housing needs on sites suitable to accommodate the 6th cycle RHNA allocation through housing-related amendments to the County of Orange General Plan Elements and Comprehensive Zoning Code. Sites suitable for eligible projects occur within residential, commercial, and industrial zoning districts (refer to Section 2.5). The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential development density. For eligible affordable housing

projects located in the commercial and industrial zoning districts, the base density would be increased from 43 up to 70 units per acre. In high-density residential zoning districts, a base density of up to 70 units per acre would be applied regardless of the maximum density of the underlying base zoning district.

Project implementation does not grant any land use entitlements, authorize development of any specific development project, change base zoning districts, or require any direct physical changes to land or existing development. Therefore, because no substantial evidence exists of a direct primary Project-level impact, no impacts related to the seven threshold questions specific to Utilities and Service Systems would result.

Although the amendments have the potential to increase the density on certain sites within unincorporated areas, at this time, meaningful environmental review cannot be conducted because there is no certainty that the development will occur or to what degree any given parcel will be developed. Should development be proposed on any of the sites, a planning review with OC Development Services/Planning would be required.

**Mitigation Measures:** No mitigation measures are either required or necessary.

**Impact Conclusion:** No direct or indirect impacts would result from Project implementation. Therefore, the project would have no impact on Utilities and Service Systems.

#### **References**

Orange, County of. General Plan, Public Services and Facilities Element. 2012

<b>3.20 Wildfire</b>	<b>Potentially Significant Impact</b>	<b>Less than Significant With Mitigation</b>	<b>Less than Significant Impact</b>	<b>No Impact</b>
<i>Would the project:</i>				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Response to Impact Questions (a - d):** The Project implements a policy framework necessary to meet housing needs on sites suitable to accommodate the 6th cycle RHNA allocation through housing-related amendments to the County of Orange General Plan Elements and Comprehensive Zoning Code. Sites suitable for eligible projects occur within residential, commercial, and industrial zoning districts (refer to Section 2.5). The County is legally obligated to identify sites but not required to propose development. Project implementation merely increases potential development density. For eligible affordable housing projects located in the commercial and industrial zoning districts, the base density would be increased from 43 up to 70 units per acre. In high-density residential zoning districts, a base density of up to 70 units per acre would be applied regardless of the maximum density of the underlying base zoning district. In addition, Project implementation merely updates the Safety Element to address new statutory requirements for fire risks in State Responsibility areas and Very High Fire Hazard Severity Zones to meet the requirements of the Office of Planning and Research's Fire Hazard Planning document. (refer to Section 2.3.3).

Project implementation does not grant any land use entitlements, authorize development of any specific development project, change base zoning districts, or require any direct physical changes to land or



existing development. Therefore, because no substantial evidence exists of a direct primary Project-level impact, no impacts related to the four threshold questions specific to Wildfire would result.

Although the amendments have the potential to increase the density on certain sites within unincorporated areas, at this time, meaningful environmental review cannot be conducted because there is no certainty that the development will occur or to what degree any given parcel will be developed. Should development be proposed on any of the sites, a planning review with OC Development Services/Planning would be required.

**Mitigation Measures:** No mitigation measures are either required or necessary.

**Impact Conclusion:** No direct or indirect impacts would result from Project implementation. Therefore, the project would have no impact on Wildfire.

### **References**

No references are associated with this topic.

3.21 Mandatory Findings of Significance	Potentially Significant Impact	Less than Significant With Mitigation	Less than Significant Impact	No Impact
<i>Would the project:</i>				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Response to Impact Question a):** Refer to Section 3.4 - Biological Resources and Section 3.5 - Cultural Resources. As discussed in these sections, the proposed Project would have no effect on fish or wildlife habitat or population, 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.

**Response to Impact Question b):** There are no impacts resulting from this Project as analyzed in Sections 3.1 through 3.20 in this IS/ND. Therefore, no cumulative impacts would be created and the Project is not cumulatively considerable.

**Response to Impact Question c):** Sections 3.1 through 3.20 in this IS/ND 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.

**Mitigation Measures:** No mitigation measures are either required or necessary.

**Impact Conclusion:** All potential impacts were evaluated and determined to result in no impacts.

**Section 4: List of Preparers**

The table below provides the list of individuals who participated in the preparation of this IS/ND.

**Table 3: List of Preparers**

<b>Preparer</b>	<b>Role</b>
Justin Kirk, Planning Manager OC Public Works, Development Services/Planning	Project Director
Cindy Salazar, Land Use Manager - Advance Planning OC Public Works, Development Services/Planning	Program Manager
Ruby Maldonado, Senior Contract Planner OC Public Works, Development Services/Planning	Project Manager
Yuritzy Randle, Associate Planner OC Public Works, Development Services/Planning	Research
Kevin Shannon, Consultant - Environmental Planner OC Public Works, Development Services/Planning	Environmental Analysis
Kimley-Horn & Associates, Inc.	Housing Consultant

Source: OC Public Works, Development Services/Planning, June 2022.

**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:*



**County of Orange Planning Commission  
and  
Board of Supervisors  
601 North Ross Street  
Santa Ana, CA 92701**

*Prepared by:*

**OC Public Works/OC Development Services/Planning  
601 North Ross Street  
Santa Ana, CA 92701**

**May 2024**

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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  
Cindy.Salazar@ocpw.ocgov.com

### 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.

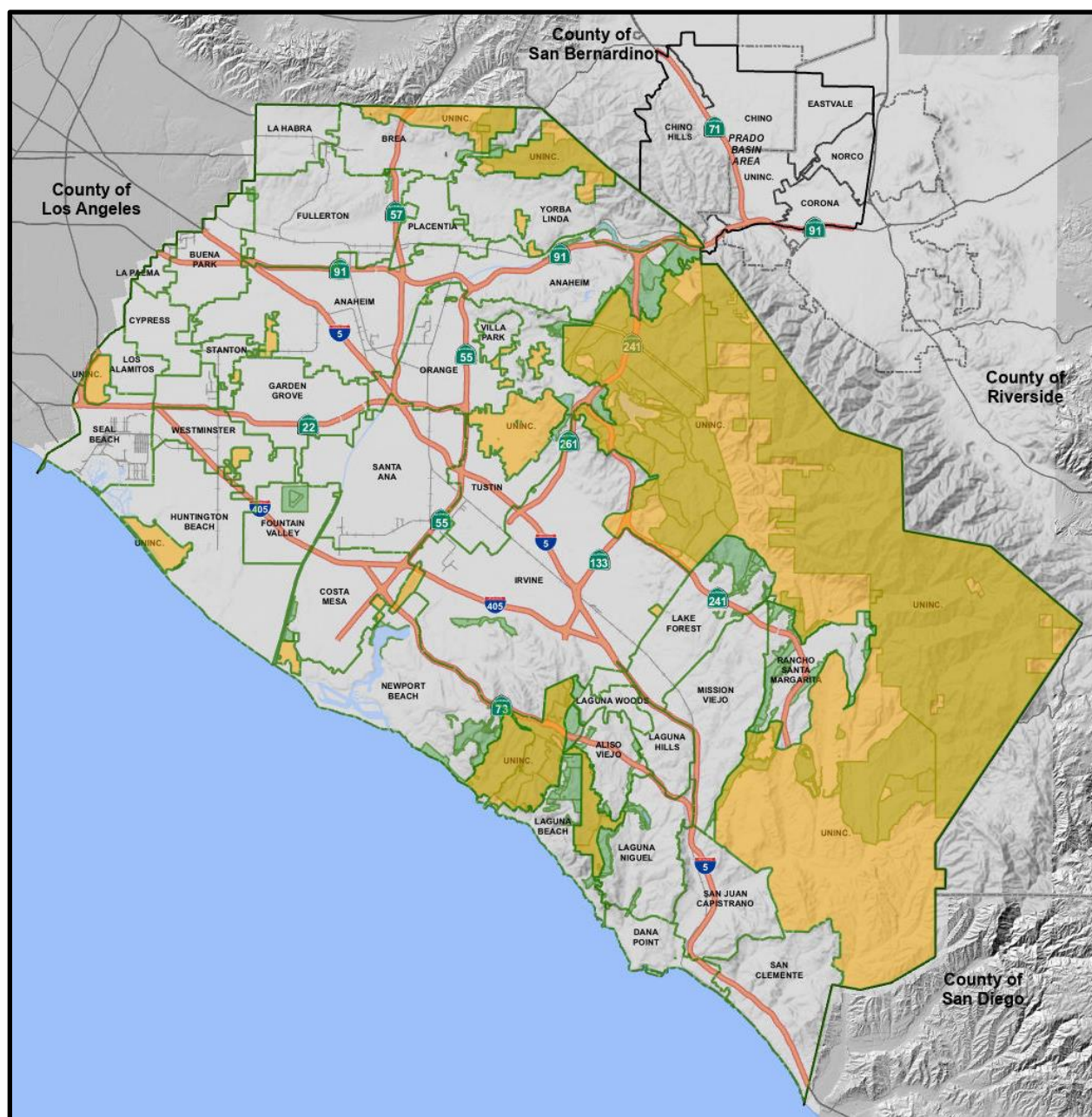
This Addendum evaluates the proposed changes to the zoning districts and the requirement of a minimum base density specific to multifamily residential zoned properties. The update to the base density is less than the 70 du/ac maximum density for the Housing Opportunities Overlay studied in IS/ND No. 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.



[illegible]

**Figure 2: Orange County Unincorporated Areas**





## 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.

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## 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.