

October 2019 | General Plan EIR Addendum

ADDENDUM TO THE GENERAL PLAN EIR
FOR THE
2019-2027 HOUSING ELEMENT UPDATE
County of Mendocino

Prepared for:

County of Mendocino

Contact: Jesse Davis, Senior Planner
860 N Bush Street
Ukiah, California 95482
707.234.6650

Prepared by:

PlaceWorks

Contact: Mark Teague, Associate Principal, AICP
101 Parkshore Drive
Roseville, California 95630
916.245.7500
info@placeworks.com
www.placeworks.com

Table of Contents

Section	Page
1. ADDENDUM TO AN ADOPTED GENERAL PLAN EIR	3
1.1 BACKGROUND.....	3
1.2 PROJECT SUMMARY	4
1.3 PURPOSE OF AN EIR ADDENDUM.....	21
2. CEQA ANALYSIS	23
2.1 ENVIRONMENTAL ANALYSIS.....	23
2.2 FINDING.....	23

Table of Contents

This page intentionally left blank.

1. Addendum to an Adopted General Plan EIR

1.1 BACKGROUND

This document serves as the environmental documentation for the County of Mendocino's proposed Housing Element update. This addendum to the County of Mendocino General Plan Environmental Impact Report (EIR) (State Clearinghouse Number 2008062074) demonstrates that the analysis contained in that EIR adequately addresses the potential physical impacts associated with implementation of the proposed 2019-2027 Mendocino County Housing Element update and that none of the conditions described in California Environmental Quality Act (CEQA) Guidelines Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.

The County of Mendocino adopted the General Plan and certified the General Plan EIR in August 2009. The General Plan serves to chart a course for County government over a period of 20 years to horizon year 2030. The goals, policies, and programs in the General Plan represent the County's statement of how Mendocino County should grow or change in the coming decades (or where it should remain the same) and how today's challenges will be met. While the General Plan EIR did not address the current Housing Element, the policies in the General Plan address all physical development in the County. The General Plan identifies overarching Principles that provide the basis for the goals and policies included in the rest of the plan. The Principles embody key issues identified by the residents of Mendocino County, such as stewardship of county resources, planning for growth, and the efficient and equitable provision of public services. The Principles are divided into three categories: (1) overall planning principles, (2) economic development and jobs/housing principles, and (3) coordination, partnerships, and funding principles.

On August 4, 2015, the County adopted the current 2014-2019 Housing Element with a negative declaration that tiered from the General Plan EIR. At that time the updates were considered minimal and the initial study concluded that a negative declaration was appropriate. Under the requirements of state law, every city and county in California must prepare a housing element as part of its general plan. The housing element must document in detail existing conditions and projected needs in accordance with state housing law provisions. The element must also contain goals, policies, programs, and quantified objectives that address housing needs over the next eight-year period.

The Housing Element is a policy document that does not result in physical changes to the environment but encourages the provision of affordable housing. While policies could require changes to the zoning ordinance or result in actions of the County that could result in physical change, none of the policies in the proposed project would result in physical changes to the environment. All development in the County is required to comply with the General Plan, zoning ordinance, and County standards. In addition, any discretionary actions require independent and project-specific environmental review. The proposed 2019-2027 Housing Element will serve as the County's guiding policy document that meets future needs of housing for all of the County's

3. Finding

economic sections, and in particular, addresses affordable housing. The proposed 2019-2027 Housing Element replaces the existing 2015 Housing Element.

1.2 PROJECT SUMMARY

Government Code, Section 65588(a)(2) “Review and Revision” requires that a newly proposed 2019-2027 Housing Element review the goals and policies of the previous housing element, and report on the attainment and disposition of the goals and policies. In many instances, the goals and policies from the previous Housing Element are continued through to the proposed 2019-2027 Housing Element. Table 1-1 includes the changes in goal or policy between the existing Housing Element and the proposed 2019-2027 Housing Element.

Table 1-1 Summary of Policy Changes Between Existing Housing Element and 2019-2027 Housing Element

Housing Policies and Actions	Progress	Continue/Modify/Delete
Action 1.1a Minimize the effects of excessive noise, light, traffic, and exposure to hazardous industrial facilities and uses through the appropriate location of all new housing away from incompatible uses. Use Geographic Information Systems (GIS) and other tools to map and identify incompatible uses during the General Plan amendment process to change General Plan land-use classifications.	The County regularly uses GIS to inform incompatible uses, especially as they relate to WUI, Flood Hazards, Seismic, etc. The information and data layers are readily shared with any whom request it.	This Action will be continued.
Action 1.1b Assist in the identification of natural hazard areas when requested by providing GIS related information to community realtors and prospective home buyers.	If requested the County provides identified hazards to community realtors and prospective home buyers. The County regularly undertakes the provision of property specific-maps, and provides more generalized information online, including Flood Zone and Fire District information through its permit tracking software.	This Action will be combined with Action 1.1.a.
Action 1.1c Work with developers to create residential neighborhoods with mixed housing densities, types, and affordability levels that promote human interaction, neighborhood-scale services and facilities, and connectivity to schools, neighborhoods, and commerce, during pre-subdivision consultation and through the Inclusionary Housing development planning process.	While there have been no new residential neighborhoods and relatively few subdivisions since the last Housing Element was adopted, the County maintains a Mixed Use General zoning district is to promote greater efficiency and economy in providing public services, conserve agriculture and resource lands, preserve the rural character of the County, and provide more opportunities for affordable housing.	This Action will be continued as new Action 1.1b.
Action 1.2a Initiate partnerships wherever possible between various governmental, financial and developmental sectors to create the supportive infrastructure and develop housing. Revisit these partnerships on an annual basis to assess and	Through MCOG and other shared bodies, such as the California State Association of Counties (CSAC) they regularly advocate	This Action will not be continued, it is done through MCOG and CSAC.

Table of Contents

evaluate progress made and suggest direction for the next year.	and cooperate on the interests of rural stakeholders such as Mendocino County.	
Action 1.2b Work with new and existing affordable housing development organizations that identify and address affordable housing needs throughout the County.	The County regularly works with both existing and new affordable housing developers to support new opportunities. Most recently, the County worked with its long-time partner, the Rural Communities Housing Development Corporation, for the 80-unit senior housing project it proposes to build between Orr Creek and Brush Street called Orr Creek Commons for low-income seniors.	This Action will be combined with Action 1.2c and d.
Action 1.2c Continue to support housing development agencies that pursue and administer programs that provide low- and moderate-income households with homeownership assistance.	The County continues to support both the Rural Community Housing Corporation (RCHDC) and the Community Development Corporation (CDC), which have developed secured funding to administer programs that provide low- and moderate-income households with homeownership assistance.	This Action will be combined with Action 1.2 b and d.
Action 1.2d Support organizations pursuing grants to fund development or rehabilitation of affordable housing by providing assistance and information when feasible.	When feasible, staff supports organizations pursuing grant opportunities by providing filtered data or planning documents.	This Action will be combined with Action 1.2 b, c.
Action 1.3a Facilitate future annexation and housing development by pursuing a master tax-sharing agreement between the County and its cities.	The Board of Supervisors formed an ad hoc committee to work on a Master Tax Sharing Agreement between the City of Ukiah and the County of Mendocino To date, while this has been a topic of discussion, no Master Tax Sharing Agreement has been proposed or executed between the County and any cities, including Willits and Fort Bragg.	This Action will be continued.
Action 1.3b Coordinate with State and local agencies, local non-profits, and charitable groups to implement the goals and policies of the Housing Element.	Staff regularly coordinate to implement Housing Element goal. In 2017, Mendocino - Rebuilding Our Community (M-ROC) was formalized with goals of identifying, prioritizing and coordinating short- and long-term recovery effort, including creating housing opportunities and connecting families in need. As of December 2018, over \$5	This Action is currently being completed through all the other Actions in the Housing Element and will therefore be deleted.

3. Finding

	million in recovery funds were raised. In addition, over 5,800 volunteer hours were donated by the M-ROC committee, the NCO volunteer network and donation centers. M-ROC works closely with the Executive Office, as well as Planning and Building Services, of the County of Mendocino	
Action 1.4a Continue conducting an annual housing summit to meet with individual communities and agencies to identify different housing related issues, needs, and potential solutions as they pertain to the various communities, and investigate ways to collaborate to access funding.	While the County has not facilitated similar 'Housing Summits', the County continues to work with individual communities to tackle local issues, such as water & infrastructure. Through entities like the Mendocino County Community Foundation, staff participates in summit level meetings on to identify collaborative funding opportunities for housing related topics such as disaster recovery and broadband. The County will consider hosting a housing summit in the future.	This Action will be continued.
Action 1.4b Support community-based organizations, coalitions and agencies in their efforts to address housing issues by providing staff assistance, data research and coordination to aid their efforts to improve the housing situation when possible.	Yes, the County has worked with the Community Foundation on a number of infrastructure related issues by providing data and staff expertise as requested.	This Action is being address through the previous Action.
Action 1.5a Continue to improve the Housing Resources webpage used to facilitate the development and improvement of affordable housing. Included on the webpage could be items such as funding resources, affordable housing development agencies and developers, energy conservation and green-building resources and services.	The County has recently received direction from the Board of Supervisors on updating the webpage.	This Action will be continued.
Action 1.5b Continue to disseminate housing related brochures (e.g. farmworker housing) to individuals, developers, and builders that visit Planning and Building offices.	The County currently disseminates housing related brochures to the general public over the counter in the Planning Department.	This Action is being combined with Action 1.5a.
Action 1.5c Continue to report on the implementation and effectiveness of the Housing Element in the General Plan Annual Report to the Board of Supervisors. Offer to hold an annual Community Development Commission workshop.	PBS reports monthly updates to the BOS on Housing Related issues, including the implementation and effectiveness of the Housing Element, new housing policies (e.g. ADUs), and fire recovery efforts, as they relate to rebuilding efforts.	This Action will be combined with Action 1.5 a and b.

Table of Contents

<p>Action 1.5d Require that building permit application packets include the Housing Affordability Survey, needed for the Annual Housing Report, with the requirement that it be turned in by the applicant with the permit packet in order for the application to be considered complete.</p>	<p>The County will plan to implement this and add a module to our permit tracking software to track this information moving forward.</p>	<p>This Action will be combined with Action 1.5 a, b and c.</p>
<p>Action 2.1a Assist developers and non-profit organizations with the acquisition, rehabilitation, or development of affordable housing as funding permits.</p>	<p>When requested County completes application components and supports funding opportunities for housing. No applications were completed during this planning period.</p>	<p>This Action will be continued.</p>
<p>Action 2.1b Continue code enforcement actions to identify substandard or unsafe housing and sanitary facilities. Provide contact information to property owners to assist in identifying programs to abate violations, assist with upgrades and weatherization, and conserve the housing stock.</p>	<p>The County continues code enforcement actions to identify sub-standard housing and/or sanitary facilities. No units were identified during this planning period.</p>	<p>This Action will be combined with Action 2.1 c, e and f.</p>
<p>Action 2.1c Use Revenue and Taxation Code Section 17274 as an inducement to private sector rehabilitation of rental housing (denies State tax deductions to owners of substandard rental property); include notice of potential use in violation notices.</p>	<p>This program is completed through the Code Enforcement Department. No units were identified during this planning period.</p>	<p>This Action will be continued.</p>
<p>Action 2.1d Continue to monitor the dates that rent- or price-restricted affordable housing projects in the unincorporated County will convert to market rate units. Work with owners and agencies to preserve this stock of affordable housing.</p>	<p>The County monitors all the affordable housing projects. No situations encountered during this planning period.</p> <p>Holly Ranch Village in Cleone was sold to private developers; approximately 15 units; deed restriction was removed; primarily market rate.</p>	<p>This Action will be continued.</p>
<p>Action 2.1e Institute procedures to comply with Government Code Section 65590 in the Coastal Zone (requires converted or demolished low- or moderate- income housing units within the Coastal Zone to be replaced with similarly affordable units onsite or elsewhere within the Coastal Zone if feasible), including procedures to review and track conversions and Coastal Zoning Code amendments if necessary.</p>	<p>The County continued to comply with Government Code Section 65590 in the Coastal Zone. There were no demolitions during this planning period and there are very few demolitions ever throughout the County.</p>	<p>This Action will be combined with Action 2.1 b, c, and f.</p>
<p>Action 2.1f Explore establishing a program to facilitate the replacement of older mobile homes in order to remove substandard units from County housing stock. This exploration should consider whether internal methods or collaborating with outside agencies, or a combination of the two, would be most efficient.</p>	<p>The County continues to explore establishing a program to facilitate the replacement of older mobile homes in order to remove substandard units from the County housing stock but to date nothing as been established. The County will continue to</p>	<p>This Action will be combined with Action 2.1 b, c, e.</p>

3. Finding

	monitor the situation and implement a program if the need arises in the next planning period.	
Action 3.1a Work with developers to include a variety of housing types, such as smaller single-family homes, second units, duplexes, and multi-family units, including rental units for lower-income large families and developments exceeding ten residential units, during pre-subdivision consultation and through the Inclusionary Housing development planning process. Consider development incentives such as reduced setbacks, density bonuses, fee assistance, etc.	The County worked with developers to include a variety of housing types in the two new development that are in processes. Currently the tools include, density bonuses; and Planned Development for flexibility. Vineyard Crossing and Gardens Gate projects are going to utilize the density bonus. No major subdivisions of note have been proposed during this planning period.	This Action will be continued.
Action 3.1b Evaluate the potential for reduced lot sizes or increased residential densities on land classified Rural Community, Mixed Use, Suburban Residential, and Commercial.	The County did evaluate the potential for reduced lot sizes and moved down to the smallest possible based on health-safety setbacks for on-site well and septic. Lack of infrastructure is prohibiting factor. The County will continue to be open to further reducing lot sizes that will be discussed with potential developers through Action 3.1 a.	This Action is addressed in Action 3.1a.
Action 3.1c On sites lacking public water, sewer or both, allow higher density housing development, within the scope of the zoning designation, that have alternate means of water supply or sewage treatment, which meet the requirements of the County Division of Environmental Health and the State Regional Water Quality Control Board and geological review.	To date, the County receives higher density housing applications that have alternate means of water supply or sewage treatment on sites.	This Action will be continued as new Action 3.1b.
Action 3.1d Rezone acreage to Multiple-Family Residential (R-3) and/or Mixed Use (MU) to meet the remaining obligation from the previous (4th) Housing Element Update cycle. Lands to be rezoned shall be located in areas with both water and sewer district service (either currently in a district or annexable within the planning period). The County may use any combination of public- or privately-initiated planning processes to achieve this goal. In addition, the County will continue to maintain an existing inventory of zoning able to accommodate its fair share of low- and very low-income housing from the 2013 Regional Housing Needs Plan.	This Action has been completed.	This Action will not be continued.
Action 3.1e Ensure the General Plan land-use classification “Mixed Use” is used in a manner that maximizes residential potential and provides a clear set of policies, regulations and requirements for those interested in developing their properties. The Mixed-Use District shall allow up to 29.04 units per acre, and include design criteria that will allow developers to submit a project, aware of the site design requirements.	The County ensures that the General Plan land-use classification “Mixed Use” is used to the maximize residential potential and provide clear guidance to those interested in developing properties. To date, only minimal adjustments have	This Action will be continued.

Table of Contents

	been made thus far to MU-zoned parcels; most developments have occurred in R-3.	
Action 3.1f Update the Density Bonus Code (Chapter 20.238) as necessary, to be consistent with current State law.	This has not been completed but grant funding has been identified for a full or partial code update.	This Action will be continued.
Action 3.2a Continue to publicize the opportunities for and encourage the production of second residential units for full time occupancy and encourage family care units.	The County promotes Coastal Zone ADUs, Inland ADUS and developed Pre-Approved ADU Plans.	This Action will be continued.
Action 3.2b Subsequent to the County’s Local Coastal Program review, seek approval from the Coastal Commission to revise the Coastal Element and Coastal Zoning Ordinance to permit second units, subject to conformity with AB 1866 and other requirements.	The County engages the CCC proactively, see CCC correspondence from June 13th, 2019.	This Action is being addressed through Action 3.2 a.
Action 3.3a Inform local agencies of their obligations to: (1) Provide the County a written offer to sell or lease surplus land for affordable housing purposes (Government Code Section 54220 et seq.), (2) Fully use Revenue and Taxation Code regulations authorizing use of State tax-defaulted property for public purposes such as land banking or specific housing projects (Section 3695.5 and 3791.4), and (3) Promote housing opportunities using underutilized lands or facilities.	The County does not rely on underutilized lands. There are very few overall sites to utilize. Potentially two school sites may be forthcoming, as the sites have been appraised, but both sites require rezone and water hookups that may not be possible: UUSD – Redwood Valley School and Hopland School.	This Action will be continued.
Action 3.4a Support the efficient delivery of water and sewer services to facilitate housing production through combined service agencies, shared facilities, or other inter-governmental agreements. Explore these options in the annual meetings described in Action 3.4b.	No, currently the water districts are fragmented, many do not have websites or appropriate staff. Encourage consolidation and sustainability of services. The water districts themselves are working on consolidation efforts to facilitate future development of higher density. The County will continue to support this effort.	This Action is being addressed in new Action 3.4a.
Action 3.4b Assist special districts to expand or upgrade services by providing planning assistance. Coordinate with Mendocino County Local Agency Formation Commission (LAFCO) to identify infrastructure development constraints. If feasible, develop a comprehensive infrastructure planning program with interested special districts.	County staff has participated in nearly all planning sessions and public meetings in support of the Boonville Water system.	This Action is being addressed in Action 3.4a.
Action 3.4c Work with water and sewer service districts to coordinate improvements with a priority to serve those medium and high residential densities as set forth in the General Plan. Inform the various service districts of the	The water districts themselves are working on consolidation efforts to facilitate future development of higher density.	This Action will be continued as new Action 3.4a.

3. Finding

<p>location of medium and high density residential designations to enable the districts to identify needed capacity improvements. Notify the districts of applicable grant opportunities that facilitate sustainable, compact development.</p>	<p>The County will continue to support this effort.</p>	
<p>Action 3.4d Service District Constraints: (1) Inform water and sewer districts of the requirement to grant priority to allocation of available and future water resources to lower income housing developments that help meet the Regional Housing Need (Government Code Section 65589.7), and (2) recommend that service districts reduce, waive, or defer connection fees for affordable housing projects when requested for project feasibility. The County will request districts to provide a copy of adopted regulations, follow-up with subsequent correspondence, and notify the public of Government Code Section 65589.7 through the Housing Resources website.</p>	<p>The County informs water and sewer districts of the requirement to grant priority to allocation of available and future water resources to lower income housing developments that help meet the regional housing need. Infrastructure limitations remain throughout the County; and moratoriums are still in place.</p>	<p>This Action will be continued at Action 3.4b.</p>
<p>Action 3.4e Work with the County Division of Environmental Health to develop and publicize, in writing and online, the technologically feasible alternatives to conventional wastewater treatment facilities that meet environmental requirements for areas outside of the municipal sanitation infrastructure. Develop usage standards if one or more technologies prove feasible for regular use and amend the Zoning Code to allow for greater density when alternative wastewater treatment facilities have been approved.</p>	<p>The County works with Environmental Health to develop and publicize alternative wastewater treatment systems for use in areas outside of sanitation districts. There is a compost toilet stakeholders workgroup. Alternative wastewater treatment systems; many non-standard systems.</p>	<p>This is initialed through the County Environmental Health Department and will not be continued in the Housing Element.</p>
<p>Action 3.4f Prior to future Regional Housing Needs Assessment (RHNA) allocation processes, advocate before the Mendocino Council of Governments (MCOG) the County's strong support for higher density, low- and very low- income housing development to occur within urbanized or incorporated parts of the County. This is based on the understanding that lower income populations can more easily obtain public services (e.g. transportation, shopping, employment centers and/or training, etc.) in such areas, and that often times service (i.e. water, sewer) capacity is more readily available for high density residential development.</p>	<p>The County advocated to MCOG during the 2019 RHNA processes.</p>	<p>This Action will be continued as Action 3.4c.</p>
<p>Action 3.5a Conduct periodic meetings with developers and non-profit housing development agencies to identify constraints to development of affordable housing and use the information gained to consider Zoning Code amendments.</p>	<p>The County worked with developers to include a variety of housing types in the two new development that are in processes and ensured that all constraints are actively being addressed.</p>	<p>This Action is being addressed in Action 3.1a.</p>
<p>Action 3.5b Reduce Constraints to Housing Production:</p>	<p>ADU ordinance updates will be completed and the County will</p>	<p>This Action will be continued.</p>

Table of Contents

<p>(1) Amend the Zoning Code and the Division of Land Regulations to allow additional exceptions to standards to facilitate affordable project feasibility, such as exceptions for setbacks, lot configuration, lot coverage, parking, building height, and others.</p> <p>(2) Evaluate and, where appropriate, reduce or modify the standards above to facilitate market rate housing production.</p> <p>(3) The County will initiate amendments to the Zoning Code to conform to the new General Plan.</p>	<p>continually update amendments to the Zoning Code to reduce constraints.</p>	
<p>Action 3.5c Provide priority processing by County staff and hearing boards for affordable housing units or special needs housing or supporting infrastructure.</p>	<p>The County provides priority processing for affordable housing units or special needs housing or supporting infrastructure. County staff have direction that prioritize job creation and housing construction; specific directive for FY2019. RCHDC – Orr Creek Commons; Boonville-Senior Housing Project; fire rebuilds receive priority rebuilds (processed within 1 week).</p>	<p>This Action will be combined to create Action 3.5a.</p>
<p>Action 3.5d Consider permit fee waivers, reductions, or deferments requested by affordable housing developers, as the County budget permits, based upon the merits of each project in meeting the County’s housing goals. All such requests must be reviewed and approved by the Board of Supervisors.</p>	<p>The County considers permit fee waivers, reductions, and deferments for affordable housing developers, as the County budget permits. The cost of administrative permits to allow for temporary trailers we waived and the County deferred the costs of fire rebuilds to the final of the permits.</p>	<p>This Action will be combined to create Action 3.5a.</p>
<p>Action 3.5e Investigate the creation of an overlay district for affordable housing that permits an increase in density only after the purchase of land by developers of affordable housing in order to keep the cost of land more affordable than land already zoned for equally high density.</p>	<p>The County has not investigated the creation of an affordable housing overlay district that allows an increase in density after property is purchased by an affordable housing developer, but the County would consider this moving forward.</p>	<p>This Action will be continued.</p>
<p>Action 3.5f Identify obstacles in zoning requirements and possible conflicts between codes and policies that may prevent the development of affordable housing at full density levels. Amend such identified codes where feasible.</p>	<p>The County did not identify impediments and conflicts between codes and policies that may prevent affordable housing development.</p>	<p>This Action will be continued as part of new Action 3.5a.</p>
<p>Action 3.5g Promote and assist with the creation of Community Land Trusts for the purpose of developing and preserving affordable housing over the long-term. Consult with existing open-space land trusts to see if they are interested in including affordable housing. They could partner</p>	<p>The County did not complete a Community Land Trusts for the purpose of developing and preserving long-term affordable housing but would consider</p>	<p>This Action will be continued.</p>

3. Finding

with non-profit housing agencies for management of the housing portion of the property.	moving forward.	
Action 3.5h Pursue the development of the remainder of the affordable multi-family units for lower-income households approved by voters under the County's Article 34 authority.		This Action will be continued.
Action 3.5i Consider advertising prime locations, as identified in Appendix B, for affordable housing development on the Housing Resources website.	The County posted the housing element online and these resources are publicized by local service providers and non-profits.	This is being done through developers meeting in Action 3.1a.
Action 3.5j Work with local housing providers to utilize collected housing trust funds from the County's Inclusionary Housing Ordinance to develop housing units.	The County remains open to working with local housing providers to utilize collected housing trust funds from the County's Inclusionary Housing Ordinance to develop housing units.	This Action is being addressed through Action 1.2a.
Action 4.1a Continue to support Community Development Commission (CDC) in their effort to conduct landlord-tenant workshops throughout the County to educate tenants and landlords about their rights and responsibilities and address concerns.	The County continues to support CDC in their effort to conduct landlord-tenant workshops.	This Action is being combined with Action 4.1 b-d.
Action 4.1b Continue to refer housing discrimination complaints to Legal Services of Northern California, State Fair Employment and Housing Commission, and the U.S. Department of Housing and Urban Development (HUD).	The County continues to refer housing discrimination complaints to Legal Services of Northern California, State Fair Employment and Housing Commission, and the U.S. Department of Housing and Urban Development (HUD).	This Action is being combined with Action 4.1 a-d.
Action 4.1c Provide informative materials concerning fair housing and housing discrimination at locations that provide housing and related services.	The County provides informative materials concerning fair housing and housing discrimination at the Planning Department counter.	This Action is being combined with Action 4.1 a-d.
Action 4.1d The County shall revise the definition of the word "family" to preclude the possibility that a residential group home could be prevented from locating in a single-family area due to the inconsistency of that use and the existing definition. The revised definition shall only reference one or more individuals living together in a dwelling unit with common access and use of all areas of the dwelling unit.	The County has not yet completed this zoning code amendment but will complete it early during this planning period.	This Action is being combined with Action 4.1 a-d.
Action 4.2a Special Needs Rental Housing: Support applications to State and Federal agencies such as Housing and Community Development (HCD), State Treasurer's Office,	The County supported applications to State and federal agencies such as HCD, State	This Action will be continued.

Table of Contents

<p>HUD and the United States Department of Agriculture (USDA) for affordable rental housing financing to provide shelter for very low- and extremely low-income families and special needs households. Programs available may be found in the Housing Resources section of the Housing Element.</p>	<p>Treasurer’s Office, US, and USDA for affordable rental housing financing. The County specifically supported the funding for the Brush Street and Orr Creek Commons.</p>	
<p>Action 4.2b Extremely Low-Income Program Development: Work with other agencies and local partners including Legal Services of Northern California to jointly develop and implement a program that is designed to address the needs of the extremely low-income households in Mendocino County. At least annually and on an on-going basis contact agencies and developers to facilitate implementation of the program. Actions to be considered for inclusion in the program include prioritizing local funding, supporting applications for funding, applying for funding, establishing incentives and concessions, exploring housing types, and methods to promote their development.</p>	<p>The County is open to working with other agencies and local partners including Legal Services of Northern California to develop a program that is designed to address the needs of the extremely low-income households in Mendocino County. During this planning period the County has coordinated with Legal Services regarding inclusionary housing and rezoning to hi.</p>	<p>This Action will be continued.</p>
<p>Action 4.3a Farm Employee/Labor Housing: Continue to work with the agricultural community, housing providers and agricultural groups to develop and build year-round and seasonal agricultural worker housing. Analyze the three prime agricultural areas in the County (Anderson, Sanel and Ukiah Valleys) to identify suitable locations for at least 20 units of farmworker housing. Information gathered from this analysis shall be provided to agricultural and affordable housing developers in a manner conducive to their use for developing the actual units. Ensure that these groups are included in regular housing stakeholder meetings.</p>	<p>The County works with the agricultural community and to assist with the development of agricultural worker housing and provide education about the County’s farm employee/labor housing regulations. Brush Street Apartments – RCHDC as well as Farm Bureau does training on employee housing education.</p>	<p>This Action is combined with Action 4.3b.</p>
<p>Action 4.3b The County will encourage and support State and Federal funding applications for farmworker housing and supporting infrastructure by providing technical assistance when needed, and continue to conduct pre-application conferences and meet with farmworker housing developers on an ongoing basis.</p>	<p>During this Planning Period, the County encouraged and supported State and Federal funding applications for farmworker housing. In addition, the County supported infrastructure by providing technical assistance. In November of 2017, a building permit was issued for a 72-unit complex on a four-acre parcel in the Ukiah Valley. The County held pre-application conferences following the regular County Subdivision Committee Meeting on the second Thursday of each month.</p>	<p>This Action is combined with Action 4.3a.</p>
<p>Action 4.3c If an outside source of funds can be found, the County shall conduct a Farmworker Housing Survey within the planning period of the 2014 Housing Element. The survey should address issues such as (but not limited to) housing conditions, affordability, commuting patterns and cost.</p>	<p>While the County recognizes that housing conditions, affordability, community patterns and cost are issues, a Farmworker Housing Survey for the Planning Period of the 2014 Housing Element is not</p>	<p>This Action will not be continued since farmworker housing is addressed through the previous Actions.</p>

3. Finding

	considered a priority. During this Planning Period, outside sources of funds were not identified. The most recent comprehensive analysis was completed by CIRS in 2008.	
Action 4.3d The County shall review the Zoning Code related to agricultural employee housing for consistency with State law.	The County is in compliance with state law.	This action will not be continued.
Action 4.3e Create an informative document that includes planning policies and regulations that will assist farmers in the development of farmworker housing: (1) Provide information about the County’s farm employee/labor housing regulations, including posting information on the Housing Resources website. (2) Meet with the Mendocino County Farm Bureau and other farm advocacy groups to discuss agricultural related policies, regulations and opportunities contained within the County’s planning documents.	County staff met with the Farm Bureau on multiple occasions to discuss the impact of cannabis regulation on existing agriculture industry.	This Action will be combined with Action 4.3a.
Action 4.3f Encourage the production of affordable housing for Native Americans pursuant to the Native American Housing Assistance and Self-Determination Act of 1996 (NAHASDA) on fee land owned by Indian tribes that qualifies for the tax exemption under California Revenue and Taxation Code Section 237 or Federal land held in trust for Indian tribes, or by entering into local cooperation agreements with Indian tribes when required for the use of NAHASDA funding within the County, and by advocating that Indian tribes and housing agencies work with the County to maximize the compatibility of Indian housing projects with County General Plan objectives.	The County welcomes housing for Native Americans. During this planning period there were no opportunities to enter into local cooperation agreements with Indian Tribes.	This Action will be continued as Action 4.3b.
Action 4.3g Increase housing opportunities for persons with disabilities consistent with the fair housing and disability laws, and encourage physical access to and within residential units during the development review process. Encourage developers to make accommodations during the development review process and utilize appropriate sections of the County Zoning Code intended to accommodate individuals with disabilities.	The County annually review their Zoning and Building Code to ensure that there are no constraints to housing for persons with disabilities.	This Action will be continued as Action 4.3c.
Action 4.3h Provide planning assistance to address homelessness in the County by: (1) Working with Mendocino County’s “Continuum of Care Plan” to address homelessness by assisting the Homeless Services Planning Group (HSPG) when practical to develop shelters, transitional, and permanent supportive housing for homeless residents in the County. (2) Treating applications for transitional and supportive housing applications similar to other residential applications	The County provides planning assistance to address homelessness by supporting the COC Plan to address homelessness by assist the Homeless Services Planning Group through a coordinated approach countywide.	This Action will be continued as Action 4.3d.

Table of Contents

within that zoning district.		
Action 4.3i Homeless Multi-Service Shelter and Assistance and Hospitality Centers: Continue to support the efforts of the Homeless Services Planning Group, Ford Street Project, and the Hospitality House Center to provide emergency shelter to homeless families and individuals, by providing planning assistance, letters of support, and attending meetings when resources permit.	The County continues to support the efforts of the Homeless Services Planning Group, Ford Street Project, and the Hospitality House Center to provide emergency shelter to homeless families and individuals.	This Action will be continued as Action 4.3e.
Action 4.3j Amend the Commercial (C-1, C-2) zoning districts to allow for emergency and transitional housing by right provided that the site is (1) located in a water and sewer district, (2) located more than 300 feet from industrial uses, (3) not located in Airport Zones A-1, A-2 or B-1, and (4) not located in an Alquist-Priolo Fault zone.	On September 13, 2016, the Planning Commission recommended to amend Chapter 20, Divisions I and II of the Mendocino County Code to modify the definitions of "Family," "Supportive Housing," "Transitional Housing," "Emergency Shelter;" and the "Group Care" Use Type and to allow Emergency Shelters in C-1 and C-2 Zoning Districts by right. The Board of Supervisors found the project to be inconsistent with the goals and policies of the General Plan, its 2014-2019 Housing Element Update and/or applicable sections of the Mendocino County Code.	This Action was completed and will not be continued.
Action 4.3k Provide planning assistance to the Mental Health Branch of the Health and Human Services Agency if the division is working with a mental health service provider to develop new supportive care housing facilities in unincorporated Mendocino County.	The County supports the Mental Health Branch of the Health and Human Services Agency and will continue to provide planning assistance as requested.	This Action will be continued as Action 4.3e.
Action 4.3l Recognize that the County's aging population will require affordable housing in areas that have access to senior citizen appropriate services. Remote rural communities cannot presently provide adequate services to meet the special needs of senior citizens.	The County recognizes the importance of affordable housing for the County's aging population in areas that have access to senior citizen appropriate services. On June 2, 2016, a use permit was approved by the County Planning Commission to allow for the construction of Orr Creek Commons, an 80-unit senior housing project.	This Action will not be continued, it is currently being addressed through all the Actions under Policy 4.3.
Action 4.3m Work with the Redwood Coast Regional Center to implement an outreach program that informs families within the County on housing and services available for persons with developmental disabilities. The program may include the development of an informational brochure and information on services on the County's Housing Resources webpage.	The County supports the Health and Human Services Agency and their effort that include coordinating with the Redwood Coastal Regional Center.	This Action will be continued as Action 4.3f.
Action 4.3n Amend County Zoning Ordinance to explicitly state	On September 13, 2016, the	This Action was completed

3. Finding

<p>that transitional and supportive housing is to have the same allowances and restrictions as any other regular residential unit (single family, multi-family) and are allowed by right in all zones where residential units are permitted. This amendment will state clearly that transitional housing household occupancy is for a period of up to two years while there is no time limit to the household occupancy of supportive housing.</p>	<p>Planning Commission recommended to amend Chapter 20, Divisions I and II of the Mendocino County Code to modify the definitions of "Family," "Supportive Housing," "Transitional Housing," "Emergency Shelter;" and the "Group Care" Use Type and to allow Emergency Shelters in C-1 and C-2 Zoning Districts by right. The Board of Supervisors found the project to be inconsistent with the goals and policies of the General Plan, its 2014-2019 Housing Element Update and/or applicable sections of the Mendocino County Code.</p>	<p>and will not be continued.</p>
<p>Action 5.1a Seek out and pursue, in conjunction with local partners, funding for and development of weatherization programs for new construction and rehabilitation through sources such as the rehabilitation loan program and through referrals to the North Coast Energy Service, which provides services on behalf of Pacific Gas and Electric (PG&E) and enrollment in the Home Energy Link Program. Develop partnerships with agencies and organizations offering weatherization services, such as Renewable Energy Development Institute (REDI), Community Development Commission (CDC), and North Coast Energy Services.</p>	<p>The Planning Department refer residents to the Development and Sustainability Department of Mendocino County who focused on providing solutions to rural local governments, small businesses, low- and moderate-income residents, and nonprofit organizations.</p> <p>They provide Affordable housing development and rehabilitation project management services and Sustainability and Energy Efficiency programs.</p> <p>Mendocino Lake County Energy Watch, a partnership between Pacific Gas and Electric Company (PG&E) and CDC – provides energy efficiency audits and advice, funding and project assistance for energy efficiency retrofits, energy consumption benchmarking and training, and educational opportunities.</p> <p>Mendo-Lake Energy Watch (MLEW) serves Mendocino and Lake County local governments and special districts. They provide energy assessments, benchmarking for buildings, retrofitting, greenhouse gas emissions inventories, educational classes, and more.</p>	<p>This Action will be continued.</p>

Table of Contents

	Mendo-Lake Energy Watch (MLEW) is a partnership between the Community Development Commission of Mendocino County (CDC) and Pacific Gas and Electric Company (PG&E).	
Action 5.1b Assist residents in conserving resources and lowering utility costs by working with the utilities and local partners to conduct energy audits, water leak detection, and other measures to identify and eliminate unnecessary or wasteful resource consumption. Identify services provided and advertise on the Housing Resources website, brochures, and at stakeholder meetings.	The Planning Department refer residents to the Development and Sustainability Department of Mendocino County who focused on providing solutions to rural local governments, small businesses, low- and moderate-income residents, and nonprofit organizations. They provide Affordable housing development and rehabilitation project management services and Sustainability and Energy Efficiency programs.	This Action was combined with Action 5.1a.
Action 5.1c Protect and conserve water resources and lessen water-related expenses by encouraging rainwater collection and use, low-water landscape design and practices, gray water usage and alternative stormwater management systems for larger projects, including multi-family housing, during the development review process. Provide examples of pre-approved designs and examples, such as the Environmental Protection Agency (EPA) and Low Impact Development (LID) standards and a list of drought-tolerant and native vegetation. Additionally promote water-conserving landscaping methods using brochures and the Housing Resources website.	The County refers residents to the resources on the Russian River Watershed website and the Sonoma-Marín Water Saving Website. Both sites include examples of pre-approved design plans that the County references. In addition, the County promote water-conserving landscaping methods using brochures and the Housing Resources website.	This Action will be combined with Action 5.1d and continued.
Action 5.1d Promote stormwater management systems for multiple family housing developments that have multiple benefits such as bio-swales to reduce downstream flooding, contamination of streams and rivers, fire hazard, and irrigation needs and to distribute stormwater and recharge groundwater. Provide examples of pre-approved designs, such as EPA and Low Impact Development standards and a list of bio-filtering vegetation. Additionally promote approved stormwater management methods using brochures and the Housing Resources website.	The County provides access to a Low Impact Development (LID) manual on the Mendocino County website. In addition to the LID manual, the County promotes stormwater management systems for multiple family housing developments with multiple benefits by offering various resources on their webpage such as manuals and worksheets, stormwater management reference materials, and helpful handouts and links. The County provides examples of pre-approved designs and examples in the LID manual.	This Action is combined with Action 5.2c and continued.
Action 5.2a Reduce electricity and natural gas demands by promoting the use of renewable energy technologies in	The County promotes the use of renewable energy technologies in	This Action will be continued.

3. Finding

<p>residential and mixed-use projects. Strongly promote solar energy generation, use of solar water heaters, and passive solar design in new housing and, especially, multi-family and farmworker housing both prior to and during project review.</p>	<p>residential and mixed-use projects to reduce electricity and natural gas demands.</p>	
<p>Action 5.2b Promote the appropriate siting and design of passive solar homes that maximize the use of passive heating and cooling, and reduce demand for non-renewable resources for heating and cooling and related utility expenses both prior to and during design review.</p> <p>Assist developers accessing passive design resources with brochures and using the Housing Resources website.</p>	<p>The County promotes the appropriate siting and design of passive solar homes that maximize the use of passive heating and cooling, and reduce demand for non-renewable resources for heating and cooling and related utility expenses both prior to and during design review. The County has developed Green Building Handouts to assist developers.</p>	<p>This Action is combined with Action 5.2a and continued.</p>
<p>Action 5.2c Revise the Mendocino County Division of Land Regulations to include provisions for identifying and protecting access to solar energy for passive heating of homes as well as electrical energy generation.</p>	<p>This was not completed. The County promotes solar but due to staff time and budgets this Action is not necessary.</p>	<p>This Action will not be continued.</p>
<p>Action 5.3a Amend the building and zoning codes to remove constraints to green building, resource conservation and alternative energy generation and establish green building and sustainable practice requirements for new developments, remodels and retrofits. Topics to be included are: Green building materials and construction techniques Passive solar design and siting Energy efficient heating and cooling technology Alternative water storage, wastewater treatment and reclamation and stormwater management systems Small scale and community energy generation systems</p>	<p>The County will continue to promote green building material and constructions. Based on the County's review there are not any know constraints to building green, resource conservation and alternative energy generation. The County will continue to promote green building through the other Actions listed above.</p>	<p>This Action will be not be continued.</p>
<p>Action 5.3b Consult with service providers and municipalities to investigate feasibility of the usage of reclaimed water systems, where appropriate, for non-drinking water purposes, such as landscape irrigation and toilet flushing.</p>	<p>The County did not consult with service providers and municipalities to investigate feasibility of using reclaimed water systems for non-drinking water purposes. The County does support Purple-Pipe Project; the purple pipe to AG Lands. The County does not plan to proactively meet with services providers on this issue due to other staff commits.</p>	<p>This Action will not be continued.</p>
<p>Action 5.4a Assist residents with lowering their utility costs by advertising utility assistance, home weatherization, energy and water conservation, and green building services on the Housing Resources website.</p>	<p>The County Community Development Commission (CDC) advertises utility assistance, home weatherization, energy and water conservation, and green building services on the Housing Resources website to assist residents with lowering their</p>	<p>This Action will be continued.</p>

Table of Contents

	utility costs.	
Action 5.4b Assist developers and housing development agencies in incorporating green building, energy conservation, and alternative energy generation into their projects by providing information about resources and links to local organizations such as local renewable energy system designers and installers, rebates, energy-rating systems, and funding on the Housing Resources website.		This Action will be continued.
Action 5.4c Promote energy and water conservation education programs that address steps to energy and water efficiency, benefits of weatherization and weatherization assistance programs, information of onsite renewable energy generation technologies and financing options by advertising benefits and local conservation services, programs and workshops on the Housing Resources website.	The County refers developers and residents to the Russian River Watershed Association (RRWA) Trainings and Workshops on water efficiency landscaping, etc.	This Action will be combined with Action 5.4a.
Action 6.1a Support funding applications, when requested by service districts, for financial and technical assistance to undertake water and sewage treatment facility planning and engineering studies, improvements, and expansions that could facilitate future housing development. Provide planning and/or grant-writing assistance if time and staffing levels permit and matching funds if available. Take a proactive approach and remind the districts of the County’s willingness to provide this support annually at the meeting.	The County supports funding applications by service agencies for financial and technical assistance to undertake water and sewage treatment facility planning and engineer studies, improvements, and expansions that could facilitate future housing development and is currently supporting Boonville and Redwood Valley.	This Action will be continued.
Action 6.2a Assist agencies and organizations in their pursuit of funding by providing technical assistance when requested, as time and funding permit.	The County assists agencies and organizations in pursuing funding by providing technical assistance when requested through Pre-Application Conferences and support letters for projects regularly.	This Action will be continued.
Action 6.2b Pursuant to AB 2936 (Aroner), propose that the Board of Supervisors increase the General Plan Maintenance fee to include a higher percentage to maintain and periodically update the Housing Element in compliance with State law.	The County most recently increased the General Plan Maintenance fee from \$50 to \$116 and updates the Housing Element in compliance with State law.	This Action will be continued.
Action 6.2c Explore the feasibility of local funding for affordable or special needs housing that promotes mixed-use, transit oriented, or compact integrated communities, such as: (1) MCOG funds for eligible transportation infrastructure (2) Air Quality Management District vehicle license fees	The County will continue to explore the feasibility of local funding for affordable or special needs housing that promotes mixed-use, transit oriented, or compact integrated communities. The County did support MCOG Pedestrian Plan.	This Action will be continued.

3. Finding

<p>Action 6.2d Identify and pursue Federal, State, local, and private funding sources to expand the County’s rehabilitation loan program for income-eligible households and to provide funds for acquisition/rehabilitation of affordable housing.</p>	<p>The County continue to consider pursuing federal, State, local, and private funding sources to expand the County’s rehabilitation loan program but funding was not identified and due to staffing constraints the rehabilitation program was not expanded. The County will continue to consider expanding it.</p>	<p>This Action will be continued.</p>
<p>Action 6.2e Assist CDC in offering loan programs for home improvement as well as water and septic system repairs and upgrades to income-eligible households through the County’s Rehabilitation Loan Program by informing property owners with housing units in need of upgrades of the resource.</p>	<p>The CDC’s loan programs for home improvement and water and septic system repairs and upgrades to income-eligible households is available through their marketing efforts. The County only refers interested parties.</p>	<p>This Action is address in the Actions above and will not be continued.</p>
<p>Action 6.3a Continue to support application for the provision of rental housing assistance to extremely low-income households through the Section 8 (Housing Choice) Voucher Program.</p>	<p>The County supports CDC’s effort for rental housing assistance to extremely low-income households through the Section 8 (Housing Choice) Voucher Program.</p>	<p>This Action will be continued.</p>
<p>Action 6.3b Identify and list internet sites and links (such as Community Development Commission, Health and Human Services [HHSA] and other agency sites) for advertising housing assistance programs, such as Down Payment Assistance, Rehabilitation and Mortgage Credit Certificate Programs.</p>	<p>The County identifies and list internet sites, including the such as Community Development Commission, Health and Human Services [HHSA] and other agency sites, and links for advertising housing assistance programs.</p>	<p>This Action will be continued.</p>
<p>Action 6.4a Shelter Plus Care Tenant-Based Rental Assistance Program: Continue to apply for and provide rental assistance to very and extremely low-income homeless disabled households.</p>	<p>This is not completed through the Planning and Building Services Department.</p>	<p>This Action will not be continued.</p>
<p>Action 6.4b Continue to support the application for HUD Continuum of Care grants for homeless populations to provide and expand, through community contracts, resource centers and transitional and permanent supportive housing units for the homeless.</p>	<p>The County supports CDC’s rental assistance funded under the Continuum of Care application process and Community Development side of the U.S. Department of Housing and Urban Development. This program provides rental assistance to homeless disabled persons. The program currently has 130 clients receiving rental assistance. The program provides \$1.4 Million in rental assistance and administrative fees. The</p>	<p>This Action will be continued as Action 6.4a.</p>

Table of Contents

	program receives in-kind support from case managers at various local agencies such as Ford Street Project/Ukiah Community Center, Mendocino Coast Hospitality Center, Behavioral Health and the Alcohol and Drug Program (AODP).	
--	--	--

As shown in Table 1-1, the proposed 2019-2027 Housing Element consolidates many goals and policies from the previous Housing Element to aid in implementation and to eliminate redundancy. When compared to the existing Housing Element, there are no new goals and policies to be included in the proposed 2019-2027 Housing Element. A copy of this document, and all supportive documentation, may be reviewed or obtained at the County of Mendocino of Planning & Building Services Department, 860 North Bush Street, Ukiah, CA 95482.

1.3 PURPOSE OF AN EIR ADDENDUM

According to CEQA Guidelines Section 15164(a), an addendum shall be prepared if some changes or additions to a previously adopted EIR are necessary, but none of the conditions enumerated in CEQA Guidelines Sections 15162(a)(1)–(3) calling for the preparation of subsequent EIR have occurred. As stated in CEQA Guidelines Section 15162 (Subsequent EIRs and Negative Declarations):

When an EIR has been certified or negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:

- (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or negative declaration was adopted, shows any of the following:
 - (a) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
 - (b) Significant effects previously examined will be substantially more severe than shown in the previous EIR;

3. Finding

- (c) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
- (d) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

The proposed project would fulfill none of the conditions outlined in CEQA Guidelines Sections 15162(a)(1)-(3) as these changes would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects requiring major revisions to the 2009 General Plan EIR. Accordingly, this checklist provides the substantial evidence required by CEQA Guidelines Section 15164(e) to support the finding that a subsequent EIR is not required and an addendum to the General Plan EIR is the appropriate environmental document to address changes to the project.

As stated in CEQA Guidelines Section 15164 (Addendum to an EIR):

- a) The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.
- b) 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 EIR or negative declaration have occurred.
- c) An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration.
- d) The decision-making body shall consider the addendum with the final EIR or adopted negative declaration prior to making a decision on the project.
- e) A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.

2. CEQA Analysis

2.1 ENVIRONMENTAL ANALYSIS

Section 15164(b) of the “CEQA Guidelines” (Title 14, Cal. Code of Regs., § 15000 et seq.) authorizes a lead agency to prepare an addendum to an EIR “if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.”

Based on review of the 2009 General Plan EIR, and consideration that the proposed 2019-2027 Housing Element does not add new policies that would affect development in the County, the project would result in less than significant impacts with regard to Population/Housing/Employment.

Table 2-1 2009 General Plan EIR Impacts to Population/Housing/Employment

Impact	General Plan Policies and Action Items	Level of Significance Without Mitigation	Mitigation Measure	Resulting Level of Significance
Impact 4.11.1 Subsequent land use activities associated with implementation of the proposed General Plan Update may result in an increase in population and housing to the area.	N/A	Less Than Significant	None required.	Less Than Significant.
Impact 4.11.2 Subsequent land use activities associated with implementation of the proposed General Plan Update would not result in the displacement of housing and/or persons.	N/A	Less Than Significant	None required.	Less Than Significant.

As the proposed 2019-2027 Housing Element does not change any land use designation or zone district, the impacts of the proposed project will be no more substantial than analyzed in the 2009 EIR. No new mitigation measures are necessary, and no alternatives analyses are necessary.

2.2 FINDING

The discussion in this addendum confirms that the proposed changes to the Housing Element update have been evaluated for significant impacts pursuant to CEQA. The discussion is meaningfully different than a determination that a project is “exempt” from CEQA review, as the proposed 2019-2027 Housing Element update is not exempt. Rather, the determination here is that the potential impacts of the proposed 2019-2027 Housing Element were in a previously certified EIR (i.e., the 2009 General Plan EIR) and that the EIR

3. Finding

provides a sufficient and adequate analysis of the environmental impacts of the proposed 2019-2027 Housing Element update. Thus, the County determined that an addendum rather than an exemption is the appropriate environmental document.

There are no substantial changes in the circumstances or new information that was not known and could not have been known at the time of the adoption of the 2009 General Plan EIR. The previously adopted mitigation measures associated with the General Plan would be required to be implemented, and no new or previously considered mitigation measures would be required to be adopted. The proposed project consists entirely of land uses permitted by project sites' existing General Plan land use designation and zoning and represents no change from the impacts that were assumed and analyzed by the 2009 General Plan EIR.

As a result, and for the reasons explained in this Addendum, the project would not cause any new significant environmental impacts or substantially increase the severity of significant environmental impacts disclosed in the 2009 General Plan EIR. Thus, the proposed project does not trigger any of the conditions in CEQA Guidelines Section 15162 allowing the preparation of a subsequent EIR, and the appropriate environmental document as authorized by CEQA Guidelines Section 15164(b) is an Addendum. Accordingly, this EIR Addendum has been prepared. The Addendum demonstrates that the project will not create any new significant environmental impacts or substantially increase the severity of those significant environmental impacts disclosed in the 2009 General Plan EIR.