

Resolution Number PC-2021-0007

County of Mendocino
Ukiah, California

APRIL 15, 2021

GP_2021-0001 COUNTY OF MENDOCINO

RESOLUTION OF THE PLANNING COMMISSION, COUNTY OF MENDOCINO, STATE OF CALIFORNIA, MAKING ITS REPORT AND RECOMMENDATION TO THE MENDOCINO COUNTY BOARD OF SUPERVISORS REGARDING A GENERAL PLAN AMENDMENT TO UPDATE THE SAFETY ELEMENT CONTAINED WITHIN THE DEVELOPMENT AND RESOURCE MANAGEMENT ELEMENTS FOR THE COUNTY OF MENDOCINO AS REQUIRED BY STATE LAW (SECTION 65302(g), OF THE CALIFORNIA GOVERNMENT CODE).

WHEREAS, the County of Mendocino desires to amend its General Plan to update the Safety Element for the County of Mendocino as required by State law (Section 65302(g) of the California Government Code); and

WHEREAS, pursuant to correspondence from FEMA to the County of Mendocino, dated February 4, 2021, FEMA completed its final review of the County's Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) 2020 update, which was officially adopted by the Mendocino County Board of Supervisors on December 8, 2020 and was found to be in conformance with Code of Federal Regulations, Title 44, Part 201, Section 6 (44 CFR 201.6); and

WHEREAS, the 2021 Safety Element Update contains new and expanded policies and implementation actions surrounding evacuation and wildfire, based on the results of the Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) and the Fire Vulnerability Assessment and Evacuation Plan prepared by the Mendocino Council of Governments (MCOG), the Safety Element addresses a wide range of natural and human-caused hazards and consists of goals and policies aimed to reduce the risk associated with these hazards, such as loss of life, injuries, property damage, and economic and social dislocation. The update consists of a comprehensive update to the existing element, which was adopted on August 17, 2009. Since 2009, a number of revisions to the California Government Code have been enacted, which require an update of the Safety Element to be in compliance with SB 1241, SB 379 and SB 99 defined under State law (Section 65302(g) of the California Government Code); and

WHEREAS, the Safety Element and its applicable goals and policies are embedded within the Development and Resource Management Elements of the Mendocino County General Plan; and

WHEREAS, California Government Code Section 65302(g) requires an update to the Safety Element of the General Plan; and

WHEREAS, the draft Safety Element, consisting of the updated Development and Resource Elements, was submitted to the California Department of Forestry and Fire Protection (CalFire) for review and comment, and on April 13, 2021, CalFire provided recommended changes to the Development Element to ensure compliance with CalFire requirements and allow for the Safety Element to be submitted to the State Board of Forestry for certification; and

WHEREAS, as part of the Development and Resource Management Elements update, a Climate Adaptation Vulnerability Assessment (CAVA) that ensures consistency with California Government Code

Section 65302(g)(4) (Senate Bill 379) has been prepared and incorporated into the update of the Safety Element, recognizing that existing policies and implementation strategies in the Development Element and Resource Management Element address some of the vulnerabilities, and incorporated revisions to the existing policies and added new policies where needed to address the critical vulnerabilities of each population or asset categories identified in the CAVA; and

WHEREAS, pursuant to Government Code Section 65354, the Planning Commission is to provide its report and recommendation to the Board of Supervisors on general plan amendments; and

WHEREAS, pursuant to the provisions of the California Environmental Quality Act (Public Resources Code section 21000 et seq.; "CEQA") and the CEQA Guidelines (Title 14 California Code of Regulations section 15000 et seq.), an Environmental Impact Report was prepared for the 2009 Mendocino County General Plan Update, which determined adoption of said General Plan Update may have potentially significant impacts to the environment that can be mitigated to less than significant levels or which cannot be mitigated to less than significant levels and which are thus significant and unavoidable; and

WHEREAS, on August 17, 2009, the County of Mendocino Board of Supervisors adopted Resolution #09-182 certifying the Final Environmental Impact Report (State Clearinghouse No. 2008062074) including a Statement of Overriding Considerations and a Mitigation Monitoring and Reporting Program for the 2009 Mendocino County General Plan Update and adopted the updated Mendocino County General Plan; and

WHEREAS, the Mendocino County Department of Planning and Building Services has prepared an Addendum to the General Plan Environmental Impact Report related to the proposed Safety Element update, which is attached to this resolution as Exhibit A and incorporated herein by this reference ("Addendum"), and which determines that none of the conditions described in CEQA Guidelines section 15162 will occur; and

WHEREAS, in accordance with applicable provisions of law, the Planning Commission held a public hearing on April 15, 2021, at which time the Planning Commission heard and received all relevant testimony and evidence presented orally or in writing regarding the Addendum and the Safety Element update. All interested persons were given an opportunity to hear and be heard regarding the Addendum and the Safety Element update; and

WHEREAS, the Planning Commission has had an opportunity to review this Resolution and finds that it accurately sets forth the intentions of the Planning Commission regarding the Addendum and the Safety Element update.

NOW, THEREFORE, BE IT RESOLVED, that the Planning Commission, based on the evidence in the record before it, makes the following report and recommendation to the Mendocino County Board of Supervisors regarding General Plan Amendment GP_2021-0001 and the Addendum:

1. The Planning Commission recommends that the Board of Supervisors review and consider approval of the Addendum prepared for General Plan Amendment GP_2021-0001 and make the findings required by CEQA Guidelines section 15164.
2. The Planning Commission recommends that the Board of Supervisors find the updated Safety Element consisting of the updated Development and Resource Elements, incorporating the revisions recommended by CalFire and as modified by the Planning Commission at its April 15, 2021, meeting, and which incorporate the Multi-Jurisdictional Hazard Mitigation Plan, the Fire Vulnerability Assessment and Evacuation Plan, and the Climate Adaptation Vulnerability

Assessment (Safety Element) was prepared in accordance with the California Planning and Zoning laws and complies with all applicable provisions of California Government Code Section 65302(g).

3. The Planning Commission recommends that the Board of Supervisors find the update to the Safety Element is consistent with the other elements of the County's General Plan.
4. The Planning Commission recommends that the Board of Supervisors adopt General Plan Amendment GP_2021-0001, making the amendment to the Mendocino County General Plan, including changes to the Development Element and Resource Management Element as part of the Update to the County's Safety Element.

BE IT FURTHER RESOLVED that the Planning Commission designates the Secretary as the custodian of the document and other material which constitutes the record of proceedings upon which the Planning Commission decision herein is based. These documents may be found at the office of the County of Mendocino Planning and Building Services, 860 North Bush Street, Ukiah, CA 95482.

I hereby certify that according to the Provisions of Government Code Section 25103 delivery of this document has been made.

ATTEST: JAMES F. FEENAN
Commission Services Supervisor

By: _____

BY: IGNACIO GONZALEZ
Interim Director

ALISON PERNELL, CHAIR
Mendocino County Planning Commission

Alison Purnell

EXHIBIT A

April 2021 | General Plan EIR Addendum

ADDENDUM TO THE GENERAL PLAN EIR

SCH No. 2008062074
FOR THE

2021 DEVELOPMENT ELEMENT AND RESOURCE MANAGEMENT ELEMENT UPDATES

MENDOCINO COUNTY

Prepared for:

Mendocino County

Nash Gonzalez, Mendocino County Disaster Recovery Director
860 North Bust Street
Ukiah, California 95482
707.234.6650

Prepared by:

PlaceWorks

Contact: Mark Teague, AICP
101 Parkshore Drive, Suite 112
Roseville, California 95630
916.245.7500
info@placeworks.com
www.placeworks.com

Table of Contents

Section	Page
1. ADDENDUM TO THE CERTIFIED GENERAL PLAN EIR	1
1.1 BACKGROUND.....	1
1.2 GENERAL PLAN EIR.....	2
1.3 PROJECT SUMMARY	3
1.4 PURPOSE OF AN EIR ADDENDUM.....	16
2. CEQA ANALYSIS	19
2.1 ENVIRONMENTAL ANALYSIS.....	19
2.2 FINDING.....	20

Table	Page
TABLE 1-1 NEW AND AMENDED DEVELOPMENT ELEMENT GOALS AND POLICIES	4
TABLE 1-2 NEW AND AMENDED RESOURCE MANAGEMENT ELEMENT POLICIES	14

Table of Contents

This page intentionally left blank.

1. Addendum to the Certified General Plan EIR

1.1 BACKGROUND

The General Plan is the foundational development policy document of the County. It defines the framework by which the physical, economic, and human resources of the County are managed and used over time. The General Plan acts to clarify and articulate the County's intentions concerning the rights and expectations of the public, property owners, and prospective investors and business interests. The General Plan informs these citizens of the goals, objectives, policies, and standards for the development of the County and all sectors' responsibilities in meeting these.

Under state law requirements, every city and county in California must prepare a safety element as part of its General Plan. The safety element must be adopted to meet the legal requirements of Senate Bill (SB) 1241, SB 379, and SB 99. SB 1241 requires a safety element to address wildfire hazards, SB 379 requires climate adaptation to be integrated into general plans, and SB 99 requires a safety element to include information identifying residential developments in hazard areas that do not have at least 2 emergency evacuation routes.

The Mendocino County General Plan was adopted and the General Plan EIR (State Clearinghouse Number 2008062074) was certified in August 2009. The proposed 2021 Development Element and Resource Management Element (proposed project) will replace the existing 2009 Development Element and 2009 Resource Management Element and serve as the County of Mendocino's (County's) guiding policy documents on safety and climate adaptation. The Development Element and Resource Management Element, which meet state law requirements for a General Plan's safety element, are two of the four elements of the County's General Plan.

While the General Plan Environmental Impact Report (EIR) did not address the current or proposed Development Element and Resource Management Element, the proposed project will not result in physical changes to the environment but require the implementation of safety and emergency measures in future development. None of the policies in the proposed project would change the existing land use pattern established by the General Plan and evaluated in the General Plan EIR. All future construction within the County must comply with the General Plan, zoning ordinance, state and federal permits, and local development standards. In addition, future discretionary actions (i.e., use permits, site plan review) require independent and project-specific environmental review.

This document serves as the environmental documentation for the County's proposed Development Element and Resource Management Element updates. This addendum to the Mendocino County General Plan EIR demonstrates that the analysis contained in the EIR adequately addresses the potential physical impacts associated with implementation of the proposed 2021 Mendocino County Development Element and Resource Management Element. None of the conditions described in the California Environmental Quality Act (CEQA) Guidelines Section 15162, calling for the preparation of a subsequent EIR or negative declaration, exist.

1. Addendum to the Adopted General Plan EIR

1.2 GENERAL PLAN EIR

The General Plan EIR addresses potentially significant impacts related to air quality, biological resources, cultural resources, hydrology and water quality, noise, population/housing/employment, transportation and circulation, and utilities and service systems. The General Plan EIR found that with implementation of policies and programs from the General Plan, the following environmental topic areas would be less than significant: aesthetics/light and glare; agriculture; cultural resources; geology, soils, and mineral resources; hazards/hazardous materials; land use; and noise.

The General Plan EIR determined that implementation of the General Plan would result in significant and unavoidable impacts related to the following environmental topics:

- Air Quality
 - **Impact 4.3.2:** Subsequent land use activities associated with implementation of the proposed General Plan may result in short-term emissions generated by construction and demolition activities that would affect local air quality and could result in health and nuisance-type impacts in the immediate vicinity of individual construction sites as well as contribute to particulate matter and regional ozone impacts.
 - **Impact 4.3.3:** Negative air quality impacts associated with long-term emissions from projected growth over the planning horizon of the General Plan Update may result in violations of ambient air quality standards or create significant nuisance impacts (e.g., wood smoke).
 - **Impact 4.3.4:** Subsequent land use activities associated with implementation of the proposed General Plan Update may result in projects that would include sources of toxic air contaminants which may affect surrounding land uses/or place sensitive land uses near existing sources of toxic air contaminants.
- Biological Resources
 - **Impact 4.4.2:** Subsequent land uses activities and growth under the proposed General Plan Update could have a substantial adverse effect on any wetlands, riparian, or other sensitive biotic community or native habitat within the county.
- Hydrology and Water Quality
 - **Impact 4.8.4:** Subsequent land use activities associated with implementation of the proposed General Plan Update may increase the demand for water from groundwater sources and could thus result in overdraft.
- Population/Housing/Employment

1. Addendum to the Adopted General Plan EIR

- **Impact 4.12.1.1:** Subsequent land use activities associated with implementation of the proposed General Plan Update may increase the demand for fire protection and emergency medical services and facilities.
- **Impact 4.12.2.1:** Subsequent land use activities associated with implementation of the proposed General Plan Update may result in increased demand for law enforcement services, potentially resulting in the need for additional law enforcement personnel and related facilities.
- Transportation and Circulation
 - **Impact 4.13.1:** Subsequent land use activities in the county could result in additional traffic on area highways, which could exceed level of service standards. Implementation of the proposed General Plan Update would contribute to this impact.
- Utilities and Service Systems
 - **Impact 4.14.1.1:** Subsequent land use activities associated with implementation of the proposed General Plan Update could require additional water supplies, storage capacity, and treatment and conveyance facilities to adequately serve subsequent development.

1.3 PROJECT SUMMARY

As shown in Table 1-1, *New and Amended Development Element Goals and Policies*, and Table 1-2, *New and Amended Resource Management Element Policies*, many goals and policies are consolidated to aid in implementation and eliminate redundancy. The following new and amended goals and policies are included in the proposed Development Element and Resource Management Element. *Italic underlined* text is used to depict additions to the proposed Development Element and Resource Management Element, and ~~strikethrough~~ text is used to indicate deletions.

1. Addendum to the Certified General Plan EIR

Table 1-1. New and Amended Development Element Goals and Policies

Proposed Goals and Policies
<p>Goal DE-8 (Transportation). A balanced and coordinated transportation system that:</p> <ul style="list-style-type: none">• Is an integrated and attractive part of each community.• Is functional, safe, and pleasant to use, and supports emergency services <u>and evacuation needs</u>.• Provides a choice of modes accessing and connecting places frequented in daily life.• Promotes compact development and infrastructure efficiencies.• Is consistent with principles of sustainability and conservation of resources.• Is not solely dependent on the continuation of fossil fuel resources.• Can be maintained, used, and justified if available energy sources change during the duration of the General Plan.
<p>Goal DE-9 (Road Systems). A countywide road system that provides safe, efficient, and attractive access, <u>meets evacuation needs, and is</u> coordinated with interstate, state, local, and area-wide systems.</p>
<p>Goal DE-11 (Transit System): A <u>resilient</u> transit system responsive to transit-dependent populations and to local and regional needs.</p>
<p>Goal DE-25a (Fire). To protect life, property, and natural resources by ensuring that development is compatible with fire protection capabilities.</p>
<p>Goal DE-25b (Evacuation). <u>To ensure effective evacuation capacity and capabilities throughout the county in response to major hazards of concern.</u></p>
<p>Goal DE-31 (Climate Change Hazards): <u>To create a more resilient community that is prepared for, responsive to, and recoverable from hazards created or made worse by climate change.</u></p>
<p>Goal DE-32 (Tribal Nation Partnership): <u>To develop partnerships with neighboring tribal nations and communities that increase the health, safety, and resiliency of all persons living within Mendocino County.</u></p>
<hr/> <p>Land Use Policies for Clustering, Density Transfer, Density, Nonconformance, and Other Issues</p>
<p>Policy DE-24: Allow density transfers between land use classifications, especially in support of an action to preserve resources lands, <u>and reduce the risk to natural hazards</u>, subject to the following:</p> <ul style="list-style-type: none">• Density may be transferred from any classification to any classification with an equivalent or higher base density; except that density may not be transferred to any of the following categories:<ul style="list-style-type: none">○ Land zoned Agricultural, Open Space, or Timberland Production;

Addendum to the Certified General Plan EIR

Proposed Goals and Policies

- Land within Resource Preserves pursuant to the Mendocino County Code;
- Land within conservation or open space easements or other development-restricted areas; or
- Environmentally sensitive or hazardous areas (flooding, wildfire, landslides, and other hazards).
- If areas of the County begin to experience increased impacts to hazards resulting from climate change, these areas should be prioritized for density transfer.
- Areas from which density is transferred (i.e., donor sites) shall be protected from future division or density increases in perpetuity by a legal mechanism acceptable to the County.
- The area to which density is transferred (i.e., receptors sites) must be located and designed to protect resources, minimize site disturbance, maintain compatibility with surrounding areas, have adequate infrastructure and services, access to public roads, and comply with the General Plan, development codes, and environmental policies.
- Areas where density transfers are proposed should coordinate with the goals and policies of the Housing Element.

Industrial Development Policies

Policy DE-91: Encourage all new developments to include tree-lined streets and/or other vegetative treatments (consistent with other considerations, such as climate adaptation, drought tolerance, fire safety, and solar access) that enhance the visual or environmental aspects of the development. Promote the introduction of similar elements into existing communities where feasible.

Infrastructure (Facilities and Services) Policies

Policy DE-121: New discretionary development will be required to demonstrate that basic infrastructure is available and has adequate capacity to serve the project (including fire flow capacity), without degrading the existing level of service standards.

Transportation Policies

Policy DE-128: Ensure that transportation infrastructure accommodates the safety and mobility of motorists, pedestrians, bicyclists, and persons in wheelchairs.

Action Item DE-128.1: Establish public works standards to implement policy DE-128.

Action Item DE-128.2: Develop and implement standards to ensure that roadways and other transportation infrastructure are restored to a safe condition after repair work, utility installation, or other activity.

Action Item DE-128.3: Collaborate with Mendocino Transit Authority and School Districts to allow for emergency use of buses and drivers for evacuation purposes for carless populations, skilled nursing facilities, correctional facilities, and hospitals.

Policy DE-133: Consider community objectives and emergency evacuation constraints in prioritizing transportation improvements funding.

Addendum to the Certified General Plan EIR

Proposed Goals and Policies

Road Systems Policies

Policy DE-139: Support the construction or improvement of secondary neighborhood routes to alleviate congestion of the arterials and ensure effective evacuation access.

Policy DE-140: Maximize the safety of transportation corridors for Mendocino County's isolated populations/populations with limited egress, through safety improvements and fuel reduction activities.

Action Item DE-140.1: Prioritize safety improvement and fuel reduction activities along key roadways and pursue fuels reduction funding to support these activities, consistent with the Fire Vulnerability Assessment for Mendocino County.

Action Item DE-140.2: Develop criteria for fuel reduction and safety improvement activities and sustainable funding sources for future projects within the county.

Action Item DE-140.3: Establish an ancillary duty for Department of Transportation employees to prioritize reporting of problematic conditions along evacuation routes to the appropriate fire district Incident Command Post. Upon reporting, the Department of Transportation staff would then coordinate the appropriate repairs or modifications as required to maintain safe, usable routes provided that costs are reimbursed from non-restricted sources as appropriate.

Policy DE-141: Require all new development, redevelopment, or major renovation applying for discretionary approval to address ingress/egress issues to facilitate effective evacuation.

Action DE-141.1: Develop a constrained access implementation plan for residential neighborhoods with limited ingress/egress or a high degree of fire vulnerability within the County based on the Mendocino County Evacuation Plan.

Policy DE-149: The County will work with the Mendocino County Council of Governments and Caltrans to reinforce-maintain and rehabilitate major roads and highways County roads, and bridges, including and related associated drainage systems, consistent with the most current Pavement Management System standards Program and environmental objectives.

Policy DE-150: The County shall integrate sea-level rise and coastal hazards identified in the Mendocino County Climate Vulnerability Assessment and Multi-jurisdictional Hazard Mitigation Plan to plan for retrofits and upgrade of coastal bridges and roadways in the County.

Evacuation Routes

Policy DE-155: Periodically update the Mendocino County Evacuation Plan to ensure assets and capabilities meet the changing needs of the County.

Action Item DE-155.1: Implement the Mendocino County Evacuation Plan and conduct annual training and exercises of the plan to identify issues/challenges to potential evacuation events.

Action Item DE 155.2: All roadways used for evacuation purposes, will meet minimum roadway widths as determined by the County's Transportation Department.

Action Item DE-155.3: Identify residential neighborhoods with single ingress/egress roadways and develop an action plan to enhance evacuation capabilities.

Policy DE-156: Ensure all roadways within the County use unique names/identifiers to ensure effective emergency response and evacuation.

Addendum to the Certified General Plan EIR

Proposed Goals and Policies

Action DE-156.1: Develop a comprehensive road renaming program for areas of the County where roadways are similarly named (Ex: Rabbit Lane, which would not also allow Rabbit Road, Rabbit Avenue, Rabbit Circle, etc.) to ensure effective emergency response activities.

Transit Systems Policies

Policy DE-168: The county shall coordinate with Mendocino Transit Authority to ensure alternative routes are available if roadway infrastructure is unusable after a hazardous event.

Water Supply and Sewer (Wastewater Treatment) Services Policies

Policy DE-193: The County supports efficient and adequate public water and sewer services through combined service agencies, shared facilities, or other inter-agency agreements.

Action Item DE-193.1: Work aggressively with water and sewer service providers to overcome the current and projected system and supply deficiencies necessary to serve planned community growth and emergency response needs.

Action Item DE-193.2: Support funding applications to improve and expand water and sewer service capabilities in areas planned for future growth or to resolve existing deficiencies.

Action Item DE-193.3: Work with communities and public water and sewer service entities to monitor, manage and/or maintain community-wide or decentralized water or sewer systems.

Policy DE-198: The County shall coordinate with water and sewer system providers to ensure that water and wastewater treatment facilities are protected from flooding and erosion hazards.

Drainage and Flooding Policies

Policy DE-199: Encourage compatible uses within of flood-prone areas plain land, such as agricultural, agriculture, forestry, conservation, and recreation uses.

Action Item DE-199.1: Promote the redevelopment of properties within dam inundation areas to accommodate potential floodwaters or modify uses to reduce potential impacts from flooding events.

Policy DE-201: To the maximum extent practical, avoid constructing critical facilities within the designated 400-500-year flood plain areas or areas potentially subject to dam inundation by dam failures (or other water impoundment facilities) or seiches. If construction has to occur within these areas, implement floodproofing strategies to reduce impacts associated with flood inundation.

Policy DE-203: Recommend new developments within the 500-year flood plain adhere to the same regulations required within the 100-year flood plain to the greatest extent practicable.

Policy DE-209: Protect and enhance key critical facilities and infrastructure from existing and future flood hazards resulting from climate change.

Addendum to the Certified General Plan EIR

Proposed Goals and Policies

Other Utility Policies

Policy DE-215: The County ~~shall work with communication providers to install redundant facilities in isolated areas, reducing the change of service degradation or outages, emphasizing communication facilities that provide essential services~~ will encourage appropriate utility infrastructure necessary to support social and economic needs, including wired, wireless and satellite communications.

Policy DE-217: Prioritize enhancement of utility systems in areas of high hazard potential (wildfire, flooding, landslides) to ensure services remain operational and effective (see Policy DE-219).

Hazard Reduction and Emergency Response Policies

Policy DE-219: Locate and design critical infrastructure to withstand and operate during hazard events and subsequent recovery phases. Standards and policies include:

- Generally prohibit the construction of public or private structures designed for emergency services or public safety in areas of unacceptable risk, which shall be defined as any location at which an incident capable of either causing the facility to become inoperable has a likelihood of more than 1/1,000,000 per year.
- Facilities and structures owned or used by public entities should be designed or retrofitted, used, and occupied consistent with Uniform Building Code and County Code requirements to protect life and property from hazards.
- Noncompliant structures should be upgraded, abated, or occupancy changed, ~~with priority based on~~ prioritizing critical facilities and hazard risk.
- Encourage federal, state, and tribal authorities to evaluate facilities and structures not under County jurisdiction and to implement corrective safety measures as needed.
- Promote design elements that allow for greater social distancing and protective measures (ventilation, physical barriers, space for staff) to accommodate County and community needs during health-related incidents.

Action Item DE-219.1: Maintain emergency response plan(s) designed to reduce risk and exposure to hazardous conditions and events, respond to emergencies, and facilitate recovery.

Action Item DE-219.2: Update the emergency response plan ~~on a regular basis~~ regularly to keep pace with the growing population and emergency service capabilities.

Action Item DE-219.3a: Identify routes and sites necessary for evacuation, emergency operations, and recovery during hazard events.

Action Item DE-219.3b: Identify new evacuation routes consistent with the Mendocino County Evacuation Plan, ensuring effective ingress/egress from isolated communities.

Action Item DE-219.3c: Develop evacuation route alternatives for hazards and communities to ensure effective evacuation activities.

Action Item DE-219.4: Upgrade critical County services to employ onsite renewable energy systems to provide a basic level of operation and encourage other agencies in Mendocino County to do the same.

Addendum to the Certified General Plan EIR

Proposed Goals and Policies

Action Item DE-219.5: Increase the County's fuel storage capacities ~~so as~~ to withstand an extended but temporary disruption of deliveries.

Action Item DE-219.6: Prepare an Emergency Plan pursuant to the approved California Energy Commission guidelines for local jurisdictions that address energy shortage situations and Public Safety Power Shutoff conditions on that subject.

Action Item DE-219.7: Expand the use of Sonoma Clean Power energy resources for residents and businesses to address future energy shortage issues.

Action Item DE-219.8: Collaborate with dam owners/operators to develop a county-wide alert and warning strategy for potential dam failure/inundation events.

Policy DE-222: The County shall establish an outreach program to educate residents and business owners about natural and climate change-induced hazards and public understanding of disasters. The County shall encourage persons in hazard-prone areas to prepare and maintain an emergency and evacuation kit.

Policy DE-223: The County shall collaborate with community service and faith-based organizations to ensure that the information and services related to emergency preparedness are made available to persons with limited transportation, communication, and other lifeline resources and services.

Policy DE-224: The County's Office of Emergency Services shall provide alerts about potential developing and ongoing emergency situations through the MendoAlert and/or Nixle systems to convey information to all residents and visitors, in multiple languages and formats to ensure it is widely distributed.

Action Item DE-224.1: The County Health and Human Services Agency shall continue to maintain an up-to-date Vulnerable Populations list of contact information for County residents to allow for effective emergency notifications and evacuation warnings.

Policy DE-225: The County shall encourage emergency preparedness among visitors.

Action Item DE-225.1: The County shall develop information content for the recreation and tourism sectors to ensure that visitors are aware of and prepared for potential, developing, and ongoing hazards in the area.

Action Item DE-225.2: The County shall require hotels, short-term rentals, and other lodging establishments to provide regional evacuation route information in the event of an emergency.

Fire Protection Policies

Policy DE-226: The General Plan Land Use and zoning maps shall limit development potential within Very High Fire Hazard Severity Zones (VHFHSZ), limiting or avoiding new development in these areas. commensurate with wildland fire hazards.

Policy DE-228: The County shall deny development proposals that present substantial fire hazard risk to residents and safety providers responding to a wildland fire.

Action Item DE-228.1: Work with CalFire to administer the Fire Safe Guidelines and fire protection programs for State Responsibility Areas and development interfaces within the HFHSZ and VHFHSZ.

Action Item DE-228.2: Require new essential public facilities (fire stations, hospitals and health care facilities, emergency shelters, emergency command centers, and emergency communications facilities) to be located outside of VHFHSZs to the greatest extent possible.

Addendum to the Certified General Plan EIR

Proposed Goals and Policies

Action Item DE-228.3: Require existing essential public facilities located in VHFHSZs to be retrofitted to reduce vulnerability to wildfire hazards.

Action Item DE-228.4: Disseminate evacuation criteria for the evacuation of residential neighborhoods in accordance with the Mendocino County Evacuation Plan.

Action Item DE-228.5: Develop an inventory of vulnerable population locations (senior housing, group homes, multi-family housing) within High and Very High Fire Hazard Severity Zones.

Action Item DE-228.6: Expand the Mendocino County Evacuation Plan to include evacuation and shelter in place plans for vulnerable population locations and effectively communicate this information to the relevant first responder agencies.

Policy DE-229: Development shall be located, designed, and managed to reduce fire risk to life, property, and natural resources, and incorporate adequate fire protection consistent with the General Plan and adopted regulations.

Action Item DE 229.1: Applicants seeking discretionary approvals within and adjacent to High and Very High Fire Hazard Severity Zones within the County will be required to prepare a Fire Protection Plan (FPP), which must be approved by the fire code official, that may include but not be limited to mitigation strategies that take into consideration location, topography, geology, flammable vegetation, sensitive habitats/species, and climate of the proposed site. FPPs must address water supply, access, building ignition and fire resistance, fire protection systems and equipment, defensible space, vegetation management, and long-term maintenance. All required FPPs must be consistent with the requirements of the California Building Code Chapter 7A, International Wildland-Urban Interface Code, and the County of Mendocino.

Policy DE-230: Approval of parcel maps and tentative maps in SRAs or VHFHSZs is conditional based on meeting the SRA Fire Safe Regulations and the Fire Hazard Reduction Around Buildings and Structures Regulations, particularly those regarding road standards for ingress, egress, and fire equipment access. (Gov. Code, § 66474.02.)

Policy DE-232: New development in High and Very High Hazard Severity Zones ~~State Responsibility Areas~~ and wildland urban/rural interfaces ~~shall~~ ~~should~~ incorporate the following:

- ~~Fuelbreaks~~ Fuel breaks or greenbelts coordinated with water supplies and access, providing maximum circulation consistent with topography.
- Adequate and accessible defensible space that does not rely on publicly owned lands or open space designations of homeowner associations.
- At least two ingress-egress routes to a public roadway, unless alternatives routes accessible to fire equipment are provided.
- Access to publicly maintained evacuation routes at regular intervals.
- Access routes sufficient to accommodate evacuating vehicles, fire equipment and vegetation management zones.
- Primary traffic lanes to all building sites with turnarounds to accommodate fire equipment.
- Water supplies within a short distance of fire equipment access.
- Fire flows with adequate duration.

Addendum to the Certified General Plan EIR

Proposed Goals and Policies

- Develop fire fire-safe plans for communities to assist in qualifying for grants.

Action DE-232.1: County codes and ordinance should be amended to require that all new construction comply with the California Code of Regulations, Division 1.5, Chapter 7, which should include regulations pertaining to:

- Emergency on-site water storage for fire protection
- Covering all rain gutters with non-combustible leaf shields
- Requiring only non-combustible fences and decks
- Requiring enclosed eaves on all structures
- Installing fireproof vents on all structures (fire-rated, and flame and ember resistant)

Action DE-232.2: Identify developed areas within the County that do not meet current SRA Fire Safe Regulations or certified local ordinances.

Action DE-232.3: Developed areas identified within the County that do not meet current SRA Fire Safe Regulations or certified local ordinances should be retrofitted to comply with Policy DE-232 to the greatest extent possible.

Policy DE-235: Developments shall be approved only if sufficient firefighting resources, such as fire stations, equipment, personnel, hydrants, and water supplies, will be available to serve all phases of development.

Action Item DE-235.1: Work with fire protection organizations to achieve funding stability necessary to maintain adequate staffing, facilities, and equipment.

Action Item DE-235.2: Collaborate with fire protection authorities, land managers, private landowners, and others to improve fire management strategies for reducing the impacts of wildfires on forest and watershed ecosystems.

Action Item DE-235.3: Work with fire protection providers (i.e., CalFire, U.S. Forest Service, local fire protection districts, and cities) to ensure development is compatible with fire protection capabilities.

Action Item DE-235.4: Notify all fire agencies/districts of building permit applications that involve new structures, change in structure size, change in occupancy, and/or involve any manufacturing or processing operations as part of the entitlement/development process.

Policy DE-237: Areas affected by wildfire events should be evaluated to determine the appropriate type, density, and locations of new development or reconstruction, and adequate circulation, infrastructure, and services are available.

Action Item DE-237.1: After a wildfire event, coordinate with USGS on Preliminary Hazard Assessments to identify areas prone to flooding and mudslide/debris flows.

Addendum to the Certified General Plan EIR

Proposed Goals and Policies

Policy DE-238: New development not located in a fire protection district should mitigate impacts on first responders to emergency calls and should be required to contribute its fair share cost of providing emergency services.

Action Item DE-238.1: No later than ~~August 31, 2014~~ July 2022, the County shall develop a plan for short- and long-term funding to offset service delivery costs to local fire and emergency response districts for serving areas not within their district boundaries. This may include bonding, assessments, and/or direct fee for service. It is specifically recognized that some funding mechanisms may require voter approval to be implemented. (We assumed this has not occurred and changed the date)

Action Item DE-238.2: Acknowledgement of the lack of fire and emergency services (or the limited availability of such services) shall be recorded with the County Recorder for all developed parcels ~~which are~~ located outside of a fire protection district. This acknowledgment shall be made available to all subsequent purchasers of the property. Proof of recordation shall be a condition of approval of all discretionary permits for projects located outside of a fire protection district.

Policy DE-240: Coordinate with the Mendocino County Fire Safety Council to develop and refine their "Defensible Space" program for County residents.

Policy DE-241: The County shall collaborate with the Mendocino County Fire Safe Council to add funding, expand programs, and distribute information on the Chipping Program, Ukiah Valley Fire Fuels Reduction Project, Defensive Space Assistance for Income-Eligible, and hazard tree removal programs.

Policy DE-242: The County shall coordinate with tribal nation governments and communities within the County to complete vegetation and fuel management projects surrounding their communities.

Geologic Conditions Policies

Policy DE-252: New developments, redevelopments, and major renovations on properties with significant geologic hazards should be evaluated for density transfer potential and/or cluster development to minimize the hazard mitigation footprint and development requirements.

Seismicity Policies

Policy DE-255: Construct future County facilities to remain operational after a strong seismic event, ensuring operational use of the facility post-event (see Policy DE-219).

Policy DE-256: Restrict development along active fault segments to open space and other low intensity uses, unless adequate room is available for setbacks that ensure life safety and property are adequately protected.

Health Policies

Policy DE-264: The County shall ensure that free or reduced-cost vaccinations for vector-borne diseases are available for Mendocino County residents.

Policy DE-265: The County shall encourage agriculture and timber industries to provide adequate personal protective equipment during smoke conditions and adequate drinking water, shade, and rest periods during extreme heat conditions for outdoor workers.

Action DE-265.1: The County shall develop educational materials about extreme heat conditions and health concerns for industries that employ outdoor workers.

Addendum to the Certified General Plan EIR

Proposed Goals and Policies

Policy DE-266: *The County shall coordinate with California State Parks and the U.S. Forest Service to ensure recreation facilities, including parks, trailheads, and sports courts/fields, provide operations, including cooling through shading or tree planting and hydration through refillable water stations, to encourage proper hydration and protection against heat-related illnesses.*

Action DE-266.1: The County shall develop an outreach program to local schools to reduce outdoor exposure during extreme heat events.

Policy DE-267: *The County shall develop partnerships with local community-based organizations, school districts, and health providers to reduce food disparity and increase food security and equity.*

Emergency Medical Services

Policy DE-268: *The County shall work with local medical providers to ensure that low-cost medical and emergency medical services are available to those in isolated or disadvantaged unincorporated areas of the county.*

Climate Change Hazards

Policy DE-269: *The County shall work with Property Assessed Clean Energy programs or home weatherization providers, such as Ygrene, to deliver reduced-cost energy-efficient improvements, including insulation, window replacements, installation of new or improved air conditions systems, to low-income households and homeowners of homes built before 1990. The County shall encourage property owners to conduct suitable adaptation retrofits, such as creating defensible space or structural strengthening, concurrent with energy-efficiency retrofits.*

Policy DE-270: *The County shall establish a network of equitably located community resilience centers throughout Mendocino County, including isolated communities and near Disadvantaged Unincorporated Communities as identified in the Climate Vulnerability Assessment Report. The County shall ensure that resilience centers are situated outside of areas at risk from hazard impacts to the extent possible, provide a space to shelter if evacuations are not possible, offer refuge from extreme heat and extreme weather events, and are equipped with renewable energy generation and backup power supplies. The County shall support the physical network of community resilience centers with a virtual (web-based) resilience hub to provide residents and businesses with information and resources during an emergency.*

Policy DE-271: *The County shall coordinate with the Mendocino County Homeless Services Continuum of Care and other existing programs to ensure that emergency shelters are available during extreme heat events, severe weather and flooding events, and other highly hazardous conditions. The County shall ensure that the homeless population is made aware of these resources and provide information and resources about staying safe during hazardous conditions.*

Tribal National Partnership

Policy DE-272: *The County shall coordinate with tribal nations and tribal health providers to increase food security, ensure reduced-cost vaccinations for vector-borne diseases are available, and equity in health services.*

Policy DE-273: *The County shall promote increased coordination with tribal nations and communities regarding hazard planning and land use decisions surrounding their communities.*

Addendum to the Certified General Plan EIR

Table 1-2. New and Amended Resource Management Element Policies

Proposed Policies
Ecosystems Policies
<u>Policy RM-35:</u> <i>The County shall protect open coastal dune habitat by conducting habitat restoration and maintaining the ecosystem in coordination with the North Coast Integrated Regional Water Management Plan.</i>
<i><u>Action Item RM-35.1:</u> The County shall develop a Coordinated Dune Ecosystem Management Plan that includes the following:</i>
<ul style="list-style-type: none">• <i><u>Coordinated restoration efforts</u></i>• <i><u>Regional permitting for development</u></i>• <i><u>Providing a forum for public input and discussion on dune issues</u></i>• <i><u>Development of scenarios for the protection and acquisition of unprotected, high-priority lands</u></i>• <i><u>Education, signage, and public outreach to residents and recreationists, including trail coordination and development</u></i>• <i><u>Monitoring and enforcement</u></i>
Energy Resources Policies
<u>Policy RM-59:</u> <i>The County shall work with Pacific Gas and Electric Company and other utility providers to reduce the electrical power system's vulnerability.</i>
<i><u>Action Item RM 59.1:</u> The County shall coordinate with local and regional utility providers to ensure that areas below and adjacent to power lines are kept clear of plant matter and other accumulated debris.</i>
<i><u>Action Item RM-59.2:</u> The County shall collaborate with local and regional utility providers to conduct regular evaluations and retrofits of energy transmission and delivery infrastructure.</i>
<i><u>Action Item RM-59.3:</u> The County shall work with utility providers to underground electrical power lines throughout the County.</i>
<u>Policy RM-60:</u> <i>The County shall reduce barriers to ensuring homes and commercial buildings have resilient energy systems.</i>
<i><u>Action Item RM-60.1:</u> The County shall update the Mendocino County Code to incentivize the installation of alternative backup energy supplies in homes and commercial buildings.</i>
<i><u>Action Item RM-60.2:</u> The County shall explore grant funding opportunities to support alternative backup energy systems, prioritizing battery storage systems wherever possible.</i>
<i><u>Action Item RM-60.3:</u> The County shall require new homes to be built with the option to install solar and electric vehicle charging stations.</i>

Addendum to the Certified General Plan EIR

Proposed Policies

Action Item RM-60.4: The County shall work with Sonoma Clean Power, Pacific Gas and Electric Company, and other utility providers to educate residents and businesses about energy conservation and renewable energy options.

Agricultural Resources Policies

Policy RM-105: The County Agricultural Commissioner's Office shall coordinate with University of California (UC) Cooperative Extension to support sustainable agricultural operations through research, vegetation management programs, best management practices, and technical assistance for agricultural operators to maintain and improve soil health, identify use opportunities for sites no longer appropriate for agricultural activities, and encourage alternative crop types that are drought-, heat-, and severe weather-resistant.

Policy RM-111: The County shall develop an agricultural disaster training program and networking opportunities for farmers and agricultural agencies to increase agriculture's resilience to climate change hazards.

Forest Resources Policies

Policy RM-118: Protect forest growing stocks and timber supply, and provide infrastructure to support a diversified wood products industry. The County shall coordinate with private and public landowners to protect forest-growing stocks and timber supply from bark beetles and other forestry pests and diseases, and provide infrastructure (such as facilities that can store and process bark beetle-infested wood and debris), to support the diversified wood products industry.

1. Addendum to the Certified General Plan EIR

Except as shown in Table 1-1 and Table 1-2, all existing Development Element and Resource Management Element goals and policies will remain in place. In response to potential impacts of wildfires and climate change, the County is proposing to update its Development Element and Resource Management Element to ensure adequate emergency response and preventative measures are in place. These goals and policies will help increase the climate change resiliency of the population, built environment, economy, and natural environment within the County.

1.4 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, based on 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;
 - (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.

1. Addendum to the Certified General Plan EIR

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.

A copy of this addendum, and all supporting documentation, may be reviewed or obtained at the County of Mendocino Planning and Building Services website:

<https://www.mendocinocounty.org/government/planning-building-services/plans-guidelines-and-eirs>.

1. Addendum to the Certified General Plan EIR

This page intentionally left blank.

2. CEQA Analysis

2.1 ENVIRONMENTAL ANALYSIS

The General Plan contains policies related to development, resource management, housing, the community, and coastal resources. The General Plan is primarily designed to be self-mitigating by incorporating policies and implementation measures that address and mitigate related environmental impacts, such as zoning codes and design standards.

The proposed project would update the Development Element and Resource Management Element to ensure compliance with SB 1241, SB 379, and SB 99. The proposed project consists of updates to General Plan goals and policies, which by themselves will have no physical effect on the environment. It is therefore not possible to know the amount or types of development projects, if any, that may be proposed in the future in response to the proposed project. For this reason, CEQA provides a process for performing environmental review on a programmatic level for projects such as general plans. And, here, where general plan amendments are proposed that do not require any specific future development projects or otherwise have a physical effect on the environment, it would be speculative to conclude that the amendments have the potential to result in new significant environmental effects or a substantial increase in the severity of significant effects previously identified in the 2009 Mendocino County General Plan EIR. Furthermore, future development that will be proposed in the county, with or without the proposed project, is speculative. If a discretionary development project is proposed in the future, it will be subject to CEQA review, and at that time potential environmental impacts will be evaluated and addressed at the project-level consistent with the requirements of CEQA. At this time, there is no substantial evidence that there are any potentially new or increased effects associated with the proposed project that were not fully evaluated in the 2009 Mendocino County General Plan EIR.

Because the proposed 2021 Development Element and Resource Management Element would not result in a physical impact, the proposed project's impacts would be no more substantial than analyzed in the General Plan EIR. No new mitigation measures are necessary.

2. CEQA Analysis

2.2 FINDING

This addendum discussion confirms that the proposed project has been evaluated for significant impacts pursuant to CEQA. The 2009 General Plan EIR evaluated all the physical impacts likely to result from future development. Because the proposed 2021 Development Element and Resource Management Element do not change any land use designation or approve any development, the General Plan EIR provides a sufficient and adequate analysis of the potential environmental impacts of the proposed 2021 Development Element and Resource Management Element. All development in the County must be consistent with the General Plan and future discretionary projects proposed within the County would be subject to CEQA. Future development would be required to comply with regional, state, and federal laws, regulations, and plans, including mitigation measures outlined in the General Plan EIR.

There are no substantial changes in the circumstances or new information that was not known and could not have been known when adopting the General Plan EIR. The proposed project includes updated policies that address wildfire hazards and help increase the climate change resiliency of the population, built environment, economy, and natural environment within the County, and represents no change from the impacts that were assumed and analyzed by the 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 General Plan EIR. Thus, the proposed project does not trigger any of the conditions in CEQA Guidelines Section 15162 requiring the preparation of a subsequent EIR, and the appropriate environmental document as authorized by CEQA Guidelines Section 15164(a) is an addendum. Accordingly, this EIR addendum has been prepared.

The following identifies the standards set forth in Section 15162 as they relate to the proposed project. The text that follows the provisions of the law relates to the proposed 2021 Development Element and Resource Management Element.

- 1. No substantial changes are proposed in the project and no substantial changes occurred with respect to the circumstances under which the project is undertaken which would require major revisions of the EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.**

As shown in Table 1-1 and Table 1-2, the policy changes included in the proposed Development Element and Resource Management Element are limited to complying with state law; ensuring adequate evacuation routes; and helping increase the climate change resiliency of the population, built environment, economy, and natural environment within the County. As with the existing Development Element and Resource Management Element, this document does not result in the approval of any development project. All development in the County must be consistent with the General Plan, and future discretionary projects proposed within the County would also be subject CEQA. Future development would be required to

2. CEQA Analysis

comply with regional, state, and federal laws, regulations, and plans, including mitigation measures outlined in the General Plan EIR.

As the proposed goals and policies would not result in any physical change to the environment, there would be no new environmental impacts or increased severity of any previously evaluated environmental impacts in the General Plan EIR.

- 2. There is no 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, demonstrating that the project will have one or more significant effects not discussed in the previous EIR.**

As shown in Table 1-1 and Table 1-2, the proposed Development Element and Resource Management Element policies are similar to the General Plan's existing policies. Potential physical impacts of future development would be addressed at the time of future development. As a development project must be consistent with the General Plan, zoning, and development standards of the County, and the proposed project would not result in any physical changes to the environment, the resulting impacts would be similar to the previously certified General Plan EIR. The proposed project would not result in new environmental impacts, or an increase in the severity of any previously evaluated environmental impacts in the General Plan EIR.

- 3. There is no 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, demonstrating that significant effects previously examined will be substantially more severe than shown in the previous EIR.**

The proposed project would have the same significant impacts as those disclosed in the certified General Plan EIR. The General Plan EIR identified significant impacts for air quality, biological resources, hydrology and water quality, population/housing/employment, public services, transportation and circulation, and utilities and service systems. The policies identified in the General Plan EIR to reduce physical environmental effects would also apply to the proposed project. Because the proposed goals and policies would not result in physical changes to the environment, there are no new or more severe significant impacts associated with the proposed 2021 Development Element and Resource Management Element.

- 4. There is no 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, demonstrating that 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.**

2. CEQA Analysis

The proposed project includes policy-level changes that are limited to complying with state law; ensuring adequate evacuation routes, and helping increase the climate change resiliency of the population, built environment, economy, and natural environment within the County. The proposed project does not change land use designations or permit development not already identified in the General Plan. Moreover, the proposed project does not create new impacts or the need for additional mitigation measures. The General Plan EIR includes policies to reduce physical environmental effects and address significant impacts for air quality, biological resources, hydrology and water quality, population/housing/employment, public services, transportation and circulation, and utilities and service systems. The new and amended polices identified in Table 1-1 and Table 1-2, as well as other existing General Plan policies would apply to all future development. The County is required to comply with current laws and regulations pertaining to safety, and therefore, the proposed project would ensure that the County's General Plan is up to date and in compliance.

- 5. There is no 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, demonstrating that 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 have the same significant impacts as identified in the previously certified General Plan EIR. The proposed project would not result in any new significant impacts or substantially increase the severity of any previously identified significant impacts; therefore, no new mitigation measures or alternatives to the proposed project are required.