July 2024 | General Plan EIR Addendum

ADDENDUM TO THE GENERAL PLAN EIR

SCH No. 2015082027

FOR THE

2024–2029 HOUSING ELEMENT UPDATE

County of Tuolumne

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1. Addendum to the Adopted General Plan EIR

1.1 BACKGROUND

The proposed 2024–2029 Housing Element (Proposed Project) will replace the existing 2019–2024 Housing Element and serve as Tuolumne County's guiding policy document that meets future needs of housing for all the County's economic levels. The Housing Element is one of eighteen elements of the County's General Plan.

The Tuolumne County General Plan provides an overall framework for development in the County and protection of its natural and cultural resources, rural character, and the rights of its residents and property owners. The goals and policies contained in the General Plan apply throughout the County, except within the boundaries of the incorporated City of Sonora, and are supplemented by the policies contained in the Community Plans. The General Plan Environmental Impact Report (EIR) certified in January 2019. (State Clearinghouse Number 2015082027). addressed the future development of residential units with the land uses in the General Plan, which would not change under the proposed Housing Element. The policies in the General Plan would reduce potential physical impacts, to the extent feasible, resulting from development in Tuolumne consistent with the General Plan.

As a policy document, the Housing Element does not result in physical changes to the environment but encourages the development of housing at all income levels within the residential designations shown in the Community Development and Design Element of the General Plan. Implementation Program 3.A.c in the Proposed Project would change the existing land use pattern from (Business Park) to (Medium Density Residential). All future construction within the county must comply with the General Plan, zoning ordinance, state and federal regulations, and local development standards. In addition, future discretionary actions (i.e., use permits, design review) require project-specific environmental review to comply with the California Environmental Quality Act (CEQA). By-right projects mandated by the state of California do not trigger CEQA analysis as there is no discretion on the part of the County. However, the by-right status does not relieve property owners from complying with federal and state requirements for water quality, endangered species, wetlands, etc., nor does a by-right status exempt a development from the County Code such as noise control or grading.

This document serves as the environmental documentation for adoption of the County's proposed project. This addendum to the County of Tuolumne's General Plan demonstrates that the analysis in the General Plan EIR adequately addresses the potential physical impacts associated with development of residential uses consistent with the General Plan. As the proposed project and the implementation of the proposed project would not trigger any of the conditions described in CEQA Guidelines Section 15162 calling for the preparation of a subsequent EIR or negative declaration.

1.2 GENERAL PLAN EIR

The General Plan EIR disclosed potentially significant impacts related to agriculture and forestry resources, biological resources, cultural and tribal cultural resources, global climate change, noise, transportation, and circulation. The General Plan EIR determined that the impacts would be reduced to a less than significant level for biological resources. The General Plan EIR determined that implementation of the General Plan would result in significant and unavoidable impacts related to the following environmental topics:

Agriculture and Forestry

- GP Impact 3.2-1: Loss of High-Value Agricultural Land
- GP Impact 3.2-3: Conflict with Williamson Act Contracts, Agricultural Preserves, or Agricultural Preserve Overlay Districts

Cultural and Tribal Resources

- GP Impact 3.5-1: Change in the Significance of a Historical or Unique Archaeological Resource

Global Climate Change

- GP Impact 3.8-1: Generation of GHG Emissions, either Directly or Indirectly
- GP Impact 3.8-2: Conflict with Any Applicable Plan, Policy, or Regulation for Reducing the Emission of GHGs

Noise

- GP Impact 3.12-1: Expose New Sensitive Land Uses to Traffic Noise
- GP Impact 3.12-2: Expose Existing Sensitive Receptors to Traffic-Noise Increases
- GP Impact 3.12-3: Expose Sensitive Receptors to Construction Noise Levels That Exceed Applicable Standards
- GP Impact 3.12-4: Expose Sensitive Receptors to Construction Vibration Levels That Exceed Applicable Standards
- GP Impact 3.12-6: Expose Noise-Sensitive Land Uses to Operational Stationary Noise That Exceeds Applicable Standards

Transportation and Circulation

- GP Impact 3.16-1: Impacts to Roadway Segment Operations
- GP Impact 3.16-2: Impacts to Intersection Operations
- GP Impact 3.16-3: Hazards Due to a Design Feature or Incompatible Uses, including Agritourism Uses

1.3 PROJECT SUMMARY

The proposed project will eliminate 11 programs from the existing Housing Element because the task was completed, no longer relevant to the intent of the Housing Element, or is now a state required practice, and progress does not need to be monitored. The remaining programs continued with updates based on legislative updates, combining with other programs with similar intent, compliance with state laws, and or modify the timeframe. In addition, new programs were added, primarily to comply with updates to state law since 2019.

1.3.1 Modifications to the Certified EIR

The following text is modified to indicate changes to the certified EIR using underline for revised or new language or strikeout for deletions). The paragraph describing the Housing Element and Senior population appearing on page 3.13-1 of the certified EIR will be amended as follows:

> According to the ~~2014~~2024 Housing Element Update, Tuolumne County has a large senior population. ~~Between 2000 and 2010, the percentage of the population aged 65 or over increased from 18.3 percent of the population to 21 percent. In comparison, seniors make up 11 percent of the population statewide~~ As of 2021, the percentage of the population aged 65 or older was 26.4 percent of the total population as illustrated in Table 2.8 of the Housing Element.

The paragraph describing the Housing Element appearing on page 3.13-2 of the certified EIR will be amended as follows:

> The Tuolumne County 6th ~~5th~~ Cycle ~~2014–2019~~ 2024-2029 Housing Element Update was adopted in July 2024 ~~June 2014~~ and determined by the state to be in compliance with the Housing Element Law.

The two paragraphs on page 3.13-3 of the certified EIR will be amended as follows:

> ~~2014~~ 2024 Housing Element The Housing Element describes a variety of policies and programs intended to conserve the existing supply of housing in unincorporated Tuolumne County, including affordable housing, as well as to provide capacity for the development of new housing in accordance with the County's RHNA allocation.
>
> Tuolumne County's RHNA allocation for the ~~2014–2019~~ 2024-2029 period is ~~450~~ two new units. This total includes 1~~76~~ unit in the "extremely low," ~~"very low,"~~ and 1 in the "low" income categories. An important goal of the Housing Element is to ensure that Tuolumne County continues to grow and develop as a clean and safe County where residents have access to adequate, dignified, and affordable housing without overcrowding, where population density is in balance with resources.

1.3.2 Modified Programs

- Program 3.A.b: Accessory Dwelling Units was amended to create processes to reduce barriers for property owners to create ADUs, which may include reduced permit processing times, pre-approved manufactured ADU models, and educational outreach to property owners. Where services are limited and in high opportunity areas, the County will encourage development of ADUs to provide alternative housing choices for lower- and moderate-income households. This program is included in the Housing Element Update as Implementation Program 3.A.b Accessory Dwelling Unit Ordinance.

- Program 3.B.c: Inclusionary Ordinance was amended to add specific actions that the County recently made updates to unlink the Inclusionary Ordinance from the Planned Unit Development Permit

(PUD) process. In addition, the County will conduct further review of the value of retaining an Inclusionary Ordinance and take action based on that review. If additional constraints are identified, the ordinance will be revised or rescinded. This program is included in the Housing Element Update as Implementation Program 3.C.d: Inclusionary Ordinance.

- Program 3.B.e: Development and Acquisition of Affordable Rental and For Sale Housing was amended to establish and maintain partnerships with at least annual outreach with affordable housing developers and local nonprofit organizations able to acquire and construct or rehabilitate residential developments for the income groups noted. These efforts are intended to result in residential development in areas with better access to opportunities and sufficient service capacity to accommodate such housing, to facilitate economic mobility for lower-income residents. This program is included in the Housing Element Update as Implementation Program 3.B.b: Development and Acquisition of Affordable Rental and For-Sale Housing.

- Program 3.D.a: Monitoring and Assist Affordable Housing Projects was amended to direct the County to monitor the list of all dwellings in unincorporated Tuolumne County that are subsidized by government funding or low-income housing developed through local regulations or incentives. The list will include, at a minimum, the number of units, the type of government program, and the date on which the units are at risk of converting to market-rate dwellings. This program is included in the Housing Element Update as Implementation Program 3.D.a: Monitoring and Assisting Affordable Housing Projects.

1.3.3 Combined and Modified Programs

The following programs were combined and modified as one program to aid in their implementation, as they were similar in intent.

- Program 3.F.a, Program 3.F.b, Program 3.F.c, and Program 3.F.e. The new Implementation Program is 3.F.a: Housing for Special-Needs Groups

- Program 3.E.a, Program B.d, Program 3.E.b, and Program 3.E.e to become New Implementation Program 3.E.a Practices to Affirmatively Further Fair Housing

- Program 3.E.c, Program 3.A.a. The new Implementation Program is 3.A.a: Vacant Sites for Residential Development Database

1.3.4 New Programs

The new programs represent changes that would:

- (Implementation Program 3.A.c: General Plan Amendments to Facilitate Residential Development) Direct the County to amend the General Plan Land Use designations on a group of parcels currently designated Business Park and another parcel that needs redesignation to MDR to update their designation to Medium-Density Residential to facilitate a broader set of residential use options.

- (Implementation Program 3.B.f: State Density Bonus) Direct the County to comply with the State law and the County's Density Bonuses and Affordable Housing Incentives chapter in Title 17 of the Tuolumne County Code of Ordinances, the County provides density bonuses to qualified new housing projects to facilitate development of affordable housing consistent with state and local laws. The County will continue to update the local density bonus ordinance to maintain consistency with State law.

- (Implementation Program 3.B.g: Water and Sewer Priority) Direct the County to have water and sewer providers will establish a written procedure to grant priority water and sewer service to developments with units affordable to lower income households pursuant to Government Code Section 65589.7 by June 2025. The County will also make the Housing Element available to water and sewer providers after adoption of the element.

- (Implementation Program 3.C.b: Senate Bill 35) Direct the County to establish a written policy and/or procedure, and other guidance as appropriate, to specify the Senate Bill (SB) 35 streamlining approval process and standards for eligible projects under Government Code Section 65913.4. The applications will be available on the County's website for developers interested in pursuing the streamlined process or vesting rights.

- (Implementation Program 3.C.c: Title 17 Revisions) Direct the County to address government constraints to amend Title 17 to update parking requirements, as well as expand the definition emergency shelter to comply with current state law to expand the definition of emergency shelter to include interim interventions, including but not limited to, navigation centers, bridge housing, and respite or recuperative care. In addition, updating parking requirements to studio and 1-bedroom units to 1 space for both types of units and to 2 spaces for both 2-bedroom and 3-bedroom units. As well as update Article 5 in Title 17 to replace findings for reasonable accommodations with new findings regarding accommodations to individuals subject to equal opportunity, a disability, impose an undue financial or administrative burden to the County, or would require a fundamental alteration in the nature of a County program or law, including but not limited to land use and zoning. The changes would also remove, "The requested accommodation will not create potential significant adverse impacts on surrounding land uses" from the Reasonable accommodations. In addition, revising all Residential care home/facility definitions and how each use is allowed and revising for consistency with state law (Health and Safety Code Sections 1267.8, 1566.3, and 1568.08), including allowing as a permitted use (without discretionary review) regardless of size, licensing and updating parking requirements for these homes/facilities.

- (Implementation Program 3.D.e: Replacement of Existing Affordable Units) Direct the County to replace housing units subject to the requirements of California Government Code Section 65915(c)(3) on sites identified in the sites inventory when any new development that removes existing residential units (residential, mixed-use, or nonresidential) occurs on a site that has been occupied by or restricted for the use of lower-income households at any time during the previous five years. This requirement applies to nonvacant sites and vacant sites with previous residential uses have been occupied by or restricted for the use of lower-income households at any time during the previous five years. This requirement applies to nonvacant sites and vacant sites with previous residential uses that have been vacated or demolished.

2. CEQA Analysis

- (Implementation Program 3.E.b: Access to Resources) Address fair housing issues identified in the Assessment of Fair Housing related to access to resources and facilitate place-based strategies, the County will implement the following: increase transportation service and options to improve access to areas of higher opportunity for lower-income households or households in areas with high combined housing and transportation costs living in Jamestown and the surrounding areas, set annual goals to address needs annually in June through the rest of the planning period starting with the first goal deadline in June 2027. As well as meet monthly with the Tuolumne County Transportation Council to identify gaps in transportation services and opportunities to increase access to vocational training for adults and youth and enrichment activities for children, and to identify funding opportunities to plan and build active transportation infrastructure/amenities where new housing development is anticipated. To provide equal access to proficient schools for all students in the county, the County will commit to pursuing funding to facilitate the development of teacher housing in communities with lower-performing schools. The County will pursue funding on an annual basis starting in 2024. To work to increase employment opportunities in low-opportunity areas, including Jamestown, the Economic Development Department will develop a plan to address this issue. The plan will be developed by December 2027. Implement actions in the Regional Early Action Planning (REAP) 2.0 grant recently awarded to the County in Jamestown to support water infrastructure. Completion of the rehabilitation project is anticipated by December 2026, allowing at least 85 new residential connections. Continue to seek funding and coordinate efforts to implement place-based strategies in town centers including Jamestown, Groveland, Columbia, and Tuolumne. Update the County's Open Space Element by January 2026 to ensure access to open space in a way that considers equity, better connectivity, and encouraging open space features.

Table 1-2 Summary of Program Changes Between Existing Housing Element and 2023–2031 Housing Element

Programs	Implementation Status	Continue/Modify/Delete
3.A.a Vacant Sites for Residential Development Database The County Geographic Information System (GIS) Division will develop a searchable mapping tool showing vacant sites suitable for residential development and post it on the County's website. The tool will show zoning, General Plan designation, utilities, and nearby amenities. The map will be updated annually.	GIS staff are part of the Public Works Department and work closely with Community Development Department staff. They maintain databases and provide mapping. In 2018, they mapped vacant residential parcels in relation to amenities and services to help locate parcels for affordable housing development. A mapping tool has not been added to the County's website. The County wants to continue this part of the program for the 7th cycle Housing Element.	Modify and combine with Program 3.A.a and as New Implementation Program 3.A.a Vacant Sites for Residential Development Database
3.A.b Accessory Dwelling Unit (ADU) Ordinance The County will create an ADU ordinance that will encourage infill residential development of both stick-built and manufactured housing in areas with existing utility connections and services. The County will also create a standardized building plan that can be used for ADU construction.	The County's existing ADU regulations are in Section 17.52.200 of the Zoning Ordinance. The ADU ordinance was updated to comply with current State law as part of the County's Comprehensive Zoning Ordinance update. The County will continue to update the ADU ordinance as needed for consistency with State law throughout the planning period. Standardized building plans for ADUs have not been created.	Modify and continue as New Implementation Program 3.A.b Accessory Dwelling Unit Ordinance
3.A.c List of Sites Suitable for Lower-Income Housing Development Pursuant to Government Code Section 65583.2(c) vacant sites identified in two previous housing elements are deemed inadequate to accommodate the need for lower income households unless appropriately zoned to permit residential uses by right for developments where at least 20% of the units are affordable to lower income households. These sites must be zoned within the first three years of the planning period (August 31, 2022). As noted in Figure 87 (Sites Suitable for Lower Income Households), several vacant sites have been identified in the past two housing element periods and as a result, the County will select from these candidate sites and rezone sufficient and suitable capacity to accommodate the regional housing need for lower income households pursuant to Government Code Section 65583.2(c) by August 31, 2019. Further, the County currently has a regional housing need for lower income households of 218 units. The inventory of sites suitable for lower income households (Figure 87) currently identifies a capacity of 169 units that are appropriate zoned (allow at least 15 units per acre and consistent zoning with the general plan) and suitable for development in the planning period. Given the shortfall of 49 units to accommodate the housing needs of lower income households, the County must rezone sites pursuant to Government Code Section 65583.2(h) and (i). To address these requirements, the County will select from candidate sites identified in Figure 87 and rezone, by August 31, 2022, sufficient sites to accommodate the shortfall (49 units) and address the following: Permit owner occupied and rental multifamily residential uses by right or without discretionary action pursuant to Government Code Section 65583.2(i) for developments that include 20% of units affordable to lower income households.	Completed. The General Plan Update was approved on January 3, 2019. The County has rezoned as needed for specific projects. After analyzing the current land available that is suitable for multifamily development per the parameters of this program, the County has more than sufficient sites available to address the 6th cycle lower-income RHNA.	Delete. Completed

2. CEQA Analysis

Programs	Implementation Status	Continue/Modify/Delete
Allow at least 16 units per site. Require a minimum density of 16 units per acre. • Accommodate at least 50 percent of the very low and low-income housing need on sites designated for residential use and for which nonresidential uses or mixed uses are not permitted, except that a city or county may accommodate all of the very low and low-income housing need on sites designated for mixed uses if those sites allow 100 percent residential use and require that residential use occupy 50 percent of the total floor area of a mixed uses project.		
3.B.a Small Lot Subdivisions Continue to support the development of small detached or attached single-family housing subdivisions through the use of Planned Unit Development Permits to provide for lots which are less than 7,500 square feet in areas where public water and sewer systems are available and topography is conducive to such development.	Ongoing, no new projects. The Comprehensive Zoning Ordinance Update updated permits and procedures. This program will not be continued for this Housing Element.	Delete. Will not be continued.
3.B.b Application and Mitigation Fees Continue to waive application fees and Building Permit fees for discretionary entitlements for housing developments which include an affordable housing component on a percentage basis. Continue to waive application fees for homeless shelters, transitional housing, permanent supportive housing and safe houses. Continue to waive the County Services Impact Mitigation Fee for extremely low, very low, low, and median income housing units.	Fees have been waived for two affordable projects (Hidden Meadow Terrace and Valley Dale). This program is ongoing. The County has not declined any requests for fee waivers.	Continue as New Implementation Program 3.B.a Application and Mitigation Fees
3.B.c Inclusionary Ordinance Implement the Inclusionary Housing Ordinance in order to encourage the development of a variety of types of housing for all income levels and assist in the development of adequate housing to meet the needs of extremely low-, very low-, low-, and median- income households. The Inclusionary Ordinance has been amended to be a voluntary incentive program.	This optional ordinance has continued to be available in the County Zoning Ordinance (Title 17) but no requests have been made. The County is modifying the ordinance currently and will conduct additional review about whether it is constraining housing development.	Modify and continue as New Implementation 3.C.d Inclusionary Ordinance
3.B.d Education and Outreach Program Continue to post on the County website tenant/landlord information, information on affordable housing projects and programs available in the county, and a copy of the Housing Element. Continue to make housing referrals for affordable housing and tenant/landlord issues to local and statewide organizations. The Board of Supervisors Housing Policy Committee will continue to discuss affordable housing issues and proactively solicit input from the public.	Handouts and the Housing Element are on the County website. The County has attended educational meetings and events. The County refers affordable housing and tenant/landlord issues to HUD as well as Central California Legal Services, and Amador Tuolumne Community Action Agency (ATCAA). Prior to the dissolution of the Board of Supervisors Housing Policy Committee in 2022, the committee continued to discuss affordable housing issues and proactively solicit input from the public.	Modify to address fair housing requirements and combine with existing Programs 3.E.a, 3.E.b, and 3.E.e to become New Implementation Program 3.E.a Practices to Affirmatively Further Fair Housing

Programs	Implementation Status	Continue/Modify/Delete
3.B.e Development and Acquisition of Affordable Rental and For Sale Housing Continue to annually investigate and apply, as appropriate, for funding through state and federal agencies and private institutions in support of extremely low-, very low-, low-, median- and moderate-income housing, such as funds made available through the State's HOME, CalHome, Affordable Housing and Sustainable Communities, No Place Like Home, and CDBG Programs, Federal Home Loan Bank Programs, Affordable Housing Tax Credits, and United States Department of Agriculture Programs, as well as funding for water and sewer system improvements and expansion. Annually consult with CA Department of Housing and Community Development and other agencies on upcoming funding opportunities. Work closely with, including at least annual outreach through the multi-county continuum of care group, and support collaborative efforts of local agencies and affordable housing developers in developing affordable rental and home ownership programs including self- help housing. The County Planning and Housing Divisions will work together to provide developers with information on affordable housing development incentives. Establish and maintain partnerships with at least annual outreach with affordable housing developers and local nonprofit organizations able to acquire and construct or rehabilitate residential developments for extremely low-, very low-, low-, median- and moderate- income households. Utilize the County Inclusionary Housing Ordinance and Affordable Housing Fee Waiver Ordinance to incentivize affordable housing development. Continue to work with Visionary Home Builders, a nonprofit affordable housing developer in Stockton, to build a 65 unit affordable rental project in Jamestown on a vacant parcel. The developer has a letter of understanding with the seller. Continue to work with the Stanislaus County Housing Authority, which is the housing authority in Tuolumne County, to develop and acquire affordable housing. The housing authority purchased a 3.3 acre site on Peaceful Valley Road to build affordable housing. Continue to work with Tuolumne County Habitat for Humanity to help finance homes being built at their 33-unit Parrotts Ferry Village condominium project. Continue to organize meetings of the Foothill Housing Coalition, which is an informal organization comprised of staff from Amador, Calaveras, Tuolumne and Mariposa Counties to encourage affordable housing development in our underserved foothill region.	The County formed a Foothill Housing Coalition with Amador, Calaveras, Tuolumne, and Mariposa Counties to increase affordable housing development in the foothill region. The County is working closely with local agencies and affordable housing developers through the Housing Collaborative that meets quarterly, as well as other forums. The County meets with Stanislaus Regional Housing Authority bi-monthly . The County also works closely with Habitat for Humanity. The County Planning and Housing Divisions work together to provide information and offer to meet with affordable housing developers to provide information ahead of the pre-application review. The purpose of these meetings is to discuss and provide high-level input to facilitate better initial applications and reduce potential barriers. The County is working with Visionary Home Builders and Stanislaus Regional Housing Authority on an affordable rental project. REAP and LEAP funds were used for predevelopment on the Visionary Home Builders project. That project is not yet entitled. The Jamestown project mentioned in the program did not move forward. The Peaceful Valley Road project is in process. The applicant is continuing to address deficiencies in the initial application. The County is facilitating meetings with agencies to coordinate, minimize barriers, and negotiate on- and off-site improvements. The Habitat for Humanity project has been built and is providing affordable units. The County is currently working with them on two 3-D printed aging-in-place units that will be added to the project. In late 2022 the County was awarded REAP funds for infrastructure projects. One project, a water tank in Jamestown is expected to support a 279 unit small-lot subdivision anticipated to help serve as workforce housing.	Modify and continue as New Implementation Program 3.B.b Development and Acquisition of Affordable Rental and For-Sale Housing
3.B.f Affordable Housing Trust Fund Utilize the Affordable Housing Trust Fund as funds become available to acquire building sites for affordable housing, provide "gap" financing, leverage funds for acquisition or construction of affordable housing, and support rehabilitation of affordable housing units throughout the county. Advocate with the state, including comments on draft guidelines anticipated in late	Funds for this program are tied to the Inclusionary Housing Ordinance and funds have been deposited. The balance in the Inclusionary Housing trust is $3,710.76. No advocacy with the State	Deleted. It will not be continued.

2. CEQA Analysis

Programs	Implementation Status	Continue/Modify/Delete
summer/fall 2019, to lower the match requirement for the State Housing Trust Fund Program so that small, rural areas such as Tuolumne County can utilize this program. Consider potential regional collaboratives including for ongoing SB 2 funding. Apply for trust fund dollars upon notice of funding availability.	has occurred regarding lowering the trust fund match requirements. This program will not be continued for this Housing Element.	
3.B.g First Time Homebuyer Programs Continue to apply for funds and administer the First Time Homebuyer Program. This program currently includes a deferred, low-interest loan program and a down payment matching grant program.	During the planning period, the County assisted 8 buyers in 2020 and 8 buyers in 2019. In 2019, 2 of the units were new construction. The balance as of 12/31/21 in the HOME program reuse account was $1,657,800. As HOME funds are repaid, they are then distributed again for First-Time Homebuyers.	Continue as New Implementation Program 3.B.c First-Time Homebuyer Program
3.B.h Efficient Use of Land Require projects proposed in the R-3 (Multiple-Family Residential), R-2 (Medium Density Residential), R-1 (Single-Family Residential) and RE-1 (Residential Estate, one acre minimum) zoning districts to adhere to the minimum density standards specified in Title 17 of the Ordinance Code.	Ongoing, projects are required to meet standards.	Delete.
3.B.i Workforce Housing Establish and maintain relationships between economic development entities such as the Tuolumne County Chamber of Commerce to facilitate the development of workforce housing to support increased economic opportunities within the county. The Board of Supervisors recognizes that as economic conditions such as home prices, interest rates and rental rates shift, there is a need to review these changes to help ensure that there is adequate workforce housing.	Affordable housing financing information is available on the County's website. This relationship and effort are ongoing. The County is working within its Economic Development Executive Team. The County is also reaching out to large employers to assess need and working closely with the hospitality industry, especially those resorts in the Yosemite entrance area to find creative ways to house seasonal workers. The County is also working closely with the Chicken Ranch Casino, expected to open early next year, with an urgent need for employee housing. While these efforts are ongoing in the county, this program will not be continued for this Housing Element.	Delete. It will not be continued.
3.B.j Rental Assistance Continue to interface with the Stanislaus County Housing Authority which administers the Department of Housing and Urban Development Section 8 Rental Assistance Program in Tuolumne County and refer residents to their program. Continue to offer rental assistance through the County Tenant Based Rental Assistance Program. Continue to refer clients to the Amador Tuolumne Community Action Agency for rental assistance, security deposit and utility payment assistance.	There are 184 vouchers available in Tuolumne County from Stanislaus Regional Housing Authority (SRHA) and all are utilized. The County has updated its website to provide a link to HUD's Housing Choice Voucher Program FAQs. The County gets approximately 12-15 calls a month for rental assistance. The County refers to Stanislaus Regional Housing Authority for Housing Choice Vouchers. The County continues to refer to Amador Tuolumne Community Action Agency (ATCAA) for rental assistance.	Continue as New Implementation program 3.B.d. Rental Assistance.

2. CEQA Analysis

Programs	Implementation Status	Continue/Modify/Delete
3.B.k Mobilehome Parks Continue to administer the County Mobilehome Rent Control Ordinance to help ensure that mobilehome residents are not subject to unreasonable rent increases. Encourage the preservation and maintenance of mobilehome parks which provide a valuable source of affordable housing. County staff will respond to requests for information and complaints from the mobilehome community and refer park maintenance issues to the State Department of Housing and Community Development Division of Codes and Standards. Consult with CA Department of Housing and Community Development to consider and apply for MPRROP funds, including technical assistance and funding opportunities starting in later summer/fall 2019 and ongoing consideration on an at least annual basis.	The County continues to administer the mobile home rent control program and monitor annually. The County applied for the MORE (formerly MPRROP) grant on June 30, 2023 (already reviewed application with HCDA) for repair and replacement of mobile homes for very low-income residents, with multiple health and safety violations. The grant application requested 2.5 million with the goal of replacing 12 units. The County has been conditionally awarded the grant.	Continue as New Implementation Program 3.B.e Mobile Home Parks
3.C.a Concurrent Review Continue to allow concurrent review of discretionary entitlement applications and Building Permit applications for land development projects to reduce processing time.	The County has continued to allow concurrent review of discretionary entitlement applications and Building Permit applications. While the process is ongoing at the county, this program will not be continued in this Housing Element.	Delete. Will not be continued.
3.C.b Infill Development Continue to encourage residential infill development through flexible development standards in areas of the county where adequate public facilities and services are already in place, taking into consideration the visual character of the neighborhood. Continue to allow flexibility in development standards such as lot sizes, building heights, setbacks, site planning, parking requirements, and road requirements through the County Planned Unit Development process and the Inclusionary Housing Ordinance so that developers can utilize creative mechanisms for developing housing in existing neighborhoods.	The County is doing this and will continue. Every subdivision project uses flexible development standards.	Continue as New Implementation Program 3.C.a Infill Development
3.C.c Board of Supervisors Housing Policy Committee The Board of Supervisors Housing Policy Committee will continue to evaluate governmental constraints on the development of all forms of housing and to propose methods to alleviate these constraints. The Committee will review legislative priorities related to housing, residential development, funding, and other issues that affect housing.	The committee continued to meet to discuss housing policy and review items going before the Board of Supervisors. The Board of Supervisors Housing Policy Committee was disbanded in 2022. This program will not be continued in this Housing Element.	Delete. Will not be continued.
3.C.d Review and Revise Permit Process for Affordable Housing Review and revise the Use Permit and Site Development permit process to permit multifamily development up to maximum allowable densities (including transitional and supportive housing when proposed as a multifamily use) with objective standards, lesser or no discretion, simplified number of entitlements and not subject to exception processes such as typical conditional use findings. These changes will be completed by August 31, 2022.	The County recently completed a Comprehensive Zoning Ordinance Update that addressed all of the items in this program.	Delete. Completed.

2. CEQA Analysis

Programs	Implementation Status	Continue/Modify/Delete
In addition, by August 31, 2022, the County will revise zoning as appropriate to permit multi-family development without discretionary review in all zones allowing multifamily development pursuant to Government Code Sections 65650 to 65655 (AB 2162) and low barrier navigation centers pursuant to Government Code Sections 65660 to 65660 (AB 101).		
3.D.a Monitoring and Assist Affordable Housing Projects Monitor state and federally subsidized housing units in an effort to maintain extremely low-, very low-, low-, median- and moderate-income restrictions. The County shall respond to inquiries from tenants of subsidized housing units in a timely manner. The County shall also respond to any federal or state notices regarding subsidized housing projects. Regularly monitor the at-risk status of all assisted affordable housing projects in the County because all projects are eligible for pre-payment. Work with the project owners, the California Housing Partnership, the State Department of Housing and Community Development, and the Department of Housing and Urban Development (HUD) to make every effort to preserve these projects. Apply for funds, as available, to help extend project affordability.	The County has continued to monitor "at risk" projects and coordinate with the California Housing Partnership. This program will be modified for consistency with current State law. No projects have converted to market rate since adoption of the previous Housing Element in 2019.	Modify and continue as New Implementation Program 3.D.a Monitoring and Assisting Affordable Housing Projects
3.D.b Enforcement of Health and Safety Codes Continue to enforce building, electrical, mechanical, sanitary, and fire development codes to assure safe rental and owner-occupied housing while not imposing a disproportionate hardship on low-income families, seniors and people with disabilities. Post information on the County website to help local residents navigate the home renovation process. Provide links to websites with information on selecting contractors, obtaining financing, applying for permits, etc.	The Building Division enforces Health and Safety Codes, along with the Code Compliance Division. The County has three investigators and 1.0 full-time employee (FTE) Admin assistance in this Division. Information is posted on the County website to help local residents navigate the home renovation process.	Continue as New Implementation Program 3.D.b Enforcement of Health and Safety Codes
3.D.c Native American Rancherias Coordinate with and assist the Chicken Ranch Rancheria of Me-Wuk and the Tuolumne Band of Me-Wuk in their efforts to rehabilitate existing housing and the provide new housing opportunities for their members.	The County meets with both tribes regularly to offer support. The County has offered to support and assist both tribes if they want to apply for MORE grants. The Tuolumne Band of Me-Wuk Indians applied for a MORE grant. The County will continue to meet regularly and coordinate. While these efforts are ongoing by the county, this program will not be continued in this Housing Element.	Delete. Will not be continued.
3.D.d Improve Hazard and Health Conditions in Older Homes Continue to operate the County Owner Occupied Rehabilitation Program to correct serious health and safety-type issues in older homes owned by extremely low-, very low- and low- income households who cannot afford the cost of repairs. Continue to refer residents to the United States Department of Agriculture Housing Preservation Grant Program which offers loans and grants to low-income households to repair their homes.	The County has continued to operate the Owner-Occupied Rehabilitation Program. The County has not been referring residential to the US Department of Agriculture (USDA) Housing Preservation Grant Program but will begin doing this.	Continue as New Implementation Program 3.D.c Improve Hazard and Health Conditions in Older Homes
3.D.e Mills Act	No property owners requested exemption. This program will be removed from the Housing Element.	Delete. Will not be continued.

2. CEQA Analysis

Programs	Implementation Status	Continue/Modify/Delete
Continue to implement the Mills Act in Tuolumne County to provide reductions in property taxes to property owners for preservation of historic structures.		
3.D.f Energy Conservation The Building Division will hold an all-day seminar for contractors, plans examiners, and building and code enforcement officials on California energy code regulations. The seminar will be taught by a representative from Energy Code Ace or another entity that is an expert on energy code requirements.	The County continued to refer clients to Amador Tuolumne Community Action Agency for weatherization.	Continue as New Implementation Program 3.D.d Energy Conservation
3.E.a Education The County website has a page devoted to fair housing and tenant/landlord resources which includes links to the California Tenant Landlord Handbook, the Federal Department of Housing and Urban Development (HUD) Fair Housing Handbook, HUD's fair housing webpage, local legal clinics at Interfaith and Catholic Charities, and the Central California Legal Services. The County has posted a HUD fair housing poster in the Community Resources Agency public reception area. One of the County of Tuolumne Housing Division handouts, which are available to the public at the public reception counter in the Community Resources Agency, is an *Affordable Housing Resources in Tuolumne County*. The handout provides information on affordable housing developments in the county and housing counseling, fair housing and homeless prevention referrals. The County Housing Division will also hand out informational brochures on housing at community events such as the Senior Expo, the ATCAA Head Start Parent Information Workshop, and other events that provide outreach opportunities to a wide segment of the community.	Information is posted on the County website and in County Housing handouts. The Spanish version of California Tenants has been posted on the website. The webpage also includes referrals for legal assistance. This program will be modified for consistency with State fair housing law.	Modify to address fair housing requirements and combine with existing Programs 3.B.d, 3.E.b, and 3.E.e to become New Implementation Program 3.E.a Practices to Affirmatively Further Fair Housing
3.E.b Housing Complaints Provide information and referrals concerning fair housing and housing discrimination to help ensure that fair housing practices are followed. Continue to refer complaints regarding discriminatory housing practices to the Federal Housing and Urban Development Office of Fair Housing and Equal Opportunity, local legal clinics at Catholic Charities and Interfaith, and Central California Legal Services for resolution.	The County continues to provide referrals to the Department of Housing and Urban Development (HUD), Central California Legal Services (CCLS), and ATCAA related to discrimination complaints and tenant/landlord issues and provides information in County housing handouts. Referral agency contact information is on the County Community Development Department webpage. This program will be modified for consistency with State fair housing law.	Modify to address fair housing requirements and combine with existing Programs 3.E.a, 3.B.d, and 3.E.e to become New Implementation Program 3.E.a Practices to Affirmatively Further Fair Housing
3.E.c Housing Availability Provide an appropriate range of General Plan and Community Plan land use designations and zoning districts within each of the County's identified communities so that persons are not excluded from living in areas of the county based on housing availability. Consider factors of elevation, topography and the availability of public water and sewer systems when determining an appropriate range of land use designations and zoning districts.	The changes to the General Plan were completed in early 2019 as part of the General Plan Update. The County recently completed a Comprehensive Zoning Ordinance Update that addressed the zoning updates called for in this program.	Modify and combine with Program 3.A.a and as New Implementation Program 3.A.a Vacant Sites for Residential Development Database

2. CEQA Analysis

Programs	Implementation Status	Continue/Modify/Delete
3.E.d Overconcentration Offer incentives to residential developers through implementation of the County Inclusionary Housing and the County Fee Waiver for Affordable Housing Ordinances to encourage construction of affordable units within new market-rate developments so that affordable housing is not concentrated in any particular area of the county. Evaluate overconcentration of extremely low-, very low-, low-, median- and moderate- income housing units when considering applications proposing affordable housing.	These incentives are available through the County Inclusionary Housing Ordinance, which was part of the General Plan Update. This program will not be continued for this Housing Element.	Delete. Will not be continued.
3.E.e Housing Programs Review active County Housing Programs annually to help ensure that there is no unintended bias towards applicants and that the affordable units are not concentrated in lower-income areas or areas of minority concentration within the unincorporated area of the county.	Annually completed Fair Housing Review of County's affordable Housing Programs funded with State funds. This program will be modified as part of the program to affirmatively further fair housing in the updated Housing Element.	Modify to address fair housing requirements and combine with existing Programs 3.B.d, 3.E.b, and 3.E.a to become New Implementation Program 3.E.a Practices to Affirmatively Further Fair Housing
3.F.a Senior Housing Identify funding opportunities and establish collaborative private/public partnerships to encourage the development of senior rental and for-sale housing, congregate care facilities, assisted living facilities and convalescent hospitals to meet the needs of county residents.	An Area 12 Agency on Aging representative was appointed to Board of Supervisors Housing Policy Committee before it was dissolved. The County's efforts are ongoing with Area 12 Agency on Aging and Habitat for Humanity Tuolumne County. Area 12 is engaged in collaborative efforts through the Housing Collaborative and Economic Development Executive Team. The County is currently working with Habitat for Humanity on aging-in-place homes.	Combine with Programs 3.F.b, 3.F.c, and 3.F.e and continue as New Implemntation
3.F.b Veterans Housing Identify funding opportunities and encourage the creation of housing opportunities for veterans.	The County is currently doing this. Hidden Meadows Terrace project will have deed-restricted units for veterans.	Combine with Programs 3.F.a, 3.F.c, and 3.F.e and continue as New Implementation Program 3.F.a Housing Special Needs Groups
3.F.c Large Families/Multi-family Units Encourage rental housing developers to include units with three or more bedrooms in any new rental development to provide housing for large families.	The County is currently doing this. Valley Dale is a project that will include 3-bedroom units. The County also worked with Jamestown Terrace to convert rental apartments to increase the number of 3-bedroom units	Combine with Programs 3.F.a, 3.F.b, and 3.F.e and continue as New Implementation Program 3.F.a Housing Special Needs Groups
3.F.d Farmworker Housing and Housing for Seasonal Workers Continue to facilitate efforts of individuals, private organizations and public agencies to provide safe and adequate housing for farmworkers and seasonal workers.	Work to implement this program is ongoing. The County is considering working with resorts to provide safe, adequate housing for seasonal workers.	Continue as Implementation 3.F.b Farmworker Housing and Housing for Seasonal Workers

2. CEQA Analysis

Programs	Implementation Status	Continue/Modify/Delete
Amend the Ordinance Code to allow the use of recreational vehicles for employee housing.	The county is continuing to work with employers to identify opportunities for employee housing which could include consideration of an RV park for seasonal employees	
3.F.e Extremely Low-Income Households and Vulnerable Populations The County will assist developers of affordable housing to apply for development funds and operating subsidies to provide housing units for extremely low- income households and vulnerable populations as funds are available. Vulnerable populations include people living on Social Security Disability such as people with a mental or physical disability, people who are homeless or at risk of homelessness, unaccompanied youth, and others who are in need of housing affordable to extremely low-income households and those in need of supportive services to help them become and stay housed. The County Housing Division and the Board of Supervisors Housing Policy Committee will research and consider innovative housing solutions for extremely low-income households and vulnerable populations such as container homes, boarding houses/shared housing models, tiny/manufactured homes in mobilehome parks accessory dwelling units, and other models that provide modest housing that is affordable to households on very limited incomes.	The County is using HOME and PHLA funds to assist developers. The County continues to work on innovative housing solutions for extremely low-income households. The County is continuing to pursue options for tiny homes possibly pursuing self-help homeownership opportunity (SHOP) funds. The County is also expanding research into funding and creative solutions – facilitated by the hiring of a Housing Development Specialist in early 2023.	Combine with Programs 3.F.a, 3.F.b, and 3.F.c and continue as New Implementation Program 3.F.a Housing Special Needs Groups
3.F.f Homelessness The County Housing Division will continue to utilize State No Place Like Home Program technical assistance funds to work with developers to build permanent supportive housing for people who are experiencing homelessness and have a serious mental illness. The County will complete a County Plan to Combat Homelessness and will direct new state funds for homelessness such as Homeless Emergency Aid Program (HEAP) and California Emergency Solutions and Housing (CESH) funds to organizations that address the priorities identified in the County Plan to Combat Homelessness. The County will encourage the development of a low barrier shelter and other services needed to reduce the occurrence of homelessness. County staff will continue to attend the Amador, Calaveras, Tuolumne and Mariposa County Central Sierra Continuum of Care meetings and work to end homelessness in Tuolumne County.	The County approved the purchase of a building for use as a navigation center in May 2023. The County approved the Plan to Combat Homelessness in December 2022. County staff regularly attend Central Sierra Continuum of Care Meetings. The County received a $75,000 planning grant for No Place Like Home in 2017 – permanent supportive housing for people who are homeless and experiencing mental illness. The Board of Supervisors awarded Visionary Home Builders a contract to build affordable housing, which will include permanent supportive housing. Staff continues to work with Visionary Home Builders and the Stanislaus Regional Housing Authority to build affordable housing in the county. Staff has identified sites and assisted with site review. In 2019, the County worked with the Stanislaus Regional Housing Authority to use CESH funding to purchase a 10-unit rental complex in Sonora for permanent supportive housing and housing for people at risk for homelessness. The County will continue to support and encourage shelter projects and services to reduce homelessness.	Continue as New Implementation Program 3.F.c Homelessness

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 a 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;
>
> (c) Mitigation Programs 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 Program or alternative; or
>
> (d) Mitigation Programs 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 Program or alternative.

1.4.1 Rationale for Preparing an EIR Addendum

The RHNA shown in Table 2.62 on page 193 of the Draft Housing Element can be met without changes to any General Plan designation or zone district. Implementation Program 3.A.c could change an unknown group of parcels from Business Park to Medium Density Residential by 2026. As the extent of the changes and the number of parcels being changed is unknown at this time it would be speculative to evaluate the changes now.

The rezoning process will require an independent environmental analysis once the sites have been chosen and the public outreach process completed.

The changes envisioned by the implementation measure is a shift from one intensive development designation (Business Park) to another (Medium Density Residential) which would result in identical physical impacts analyzed in the General Plan EIR (*e.g.* clearing of the site, paving, construction). Therefore, the proposed change in type of development would not be expected to result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects requiring major revisions to the General Plan EIR.

Physical development impacts are addressed through policies in the General Plan, the County's Code of Ordinances, and adopted development standards. As future development projects must be consistent with the General Plan, and physical impacts from development consistent with the General Plan were anticipated in the General Plan EIR, the proposed project would not meet any of the conditions outlined in CEQA Guidelines Section 15162 that would require a subsequent EIR.

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.

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 General Plan EIR. The proposed project consists entirely of land uses permitted by a sites' existing General Plan land use designation and zoning and represents no change from the impacts that were assumed and analyzed by the General Plan EIR.

2. CEQA Analysis

2.1 ENVIRONMENTAL ANALYSIS

The General Plan contains policies related to aesthetics; agriculture and forestry resources; air quality; biological resources; cultural resources and tribal cultural resources; energy; geology and soils; greenhouse gas emissions; hazards and hazardous materials; hydrology and water quality; land use and planning; mineral resources; noise; population and housing; public services and recreation; transportation; utilities and services systems; and wildfire. The General Plan is largely designed to address environmental impacts by incorporating General Plan objectives, as well as laws, regulations, plans and policies from the federal, state and local level that are relevant to issue area and the 11 mitigation measures from the General Plan's Mitigation Monitoring and Reporting Program that address and mitigate environmental impacts related to implementation of the General Plan.

As described in Section 1.2, the General Plan EIR disclosed potentially significant impacts related to agriculture and forestry resources; cultural and tribal cultural resources; global climate change; noise; and transportation and circulation. Some of the existing Housing Element programs will remain unchanged with the proposed project, while other programs are being modified, combined or deleted. The new programs are either informative or would result in no physical change to the environment. Overall, the programs were modified to comply with State law, respond to directives from the California Department of Housing and Community Development (HCD), combine programs with similar intent to aid in implementation, or eliminate programs where the County has already completed the identified task. Sections 2.1.1 through 2.1.3 describe the informational changes of the modified and new programs resulting from the proposed project. These sections do not include the programs that were deleted from the Housing Element or the programs that underwent minor changes. Section 2.1.4 analyzes the modified and new programs and describes why potential environmental effects of the proposed project would be no more substantial than analyzed in the General Plan EIR.

2.1.1 Analysis of Programs

New development resulting from these programs would occur on land currently designated for housing by the Community Development and Design Element of the General Plan and analyzed in the General Plan EIR. Local regulations guide future development and would address physical impacts resulting from development. The General Plan policies and ordinances of the County such as Ordinance Code 15.28.100 Grading Plan, and Ordinance Code 12.20.080 Grading under building permit, sewage disposal permit, or well permit, which address the physical impacts associated with development, such as dust control, noise, and odor. The policies and ordinances that regulate development will not change with adoption of the proposed Housing Element. The General Plan EIR anticipated physical impacts associated with the permitted development in the County's General Plan and Zoning. The policies identified in the General Plan EIR to reduce physical environmental effects would continue to apply to future development consistent with the General Plan.

The public service impacts associated with the population increase that would be associated with new housing include police and fire services, parks, water, and sewer. Water and sewer impacts would be addressed through water and sewer connection fees as examined on Table 2.72 of the Proposed Project. Other impacts relating to county services, and traffic impacts, and driveway encroachment would also be addressed through the County development fees.

Impacts to police and fire services would only result in a physical impact if new facilities were required to meet the growth needs. If additional physical facilities for police and fire are needed this would be determined when the sites are identified and then included in the capital improvement program, as well as the County's development fees. The development fees of a typical 2,000-square-foot, single-family residence would be $23,488. For a 40-unit multifamily complex the development fees would total $559,046. Because the Proposed Project would include land use changes, impacts associated with development of residential uses identified in the Proposed Project would be addressed with the development fees.

Tuolumne County is projected to need two additional housing units for their RHNA from June 30, 2024, through June 30, 2029, to accommodate the projected increase in households within the unincorporated area of the county. Parcels suitable for residential development are identified in the maps in Appendix A of the Proposed Project. Most of the parcels are vacant. Those that are not vacant have been included because of their strong potential for residential development before June 30, 2024, either based on a proposed County project, property owner expressed interest, or the fact that the property is for sale.

The Proposed Project establishes targets that can meet its RHNA without changing any land use designation, so the land use map and zoning would remain unchanged from the document evaluated in the General Plan EIR. The Proposed Project would not change the development pattern for the County, as shown in Exhibit 2-3 of the General Plan. Physical change to the environment would occur from development assumed in the existing General Plan, but would not increase due to the Proposed Project. Therefore, development of housing identified in the Proposed Project would be consistent with what was analyzed in the General Plan EIR. Because the Proposed Project would not change the land use pattern of the County or result in any physical change to the environment not previously identified in the General Plan EIR, and because the General Plan EIR evaluated the existing land use pattern and includes policies and programs to address environmental impacts, the update to the Housing Element would not result in any new environmental impacts or increase the severity of any environmental impacts previously evaluated in the General Plan EIR. Because the Proposed Project Housing Element would change a group of parcels from Business Park to Medium Density Residential by 2026, however the land use change from (Business Park) to another (Medium Density Residential) would result in identical physical impacts analyzed in the General Plan EIR. Therefore, no new mitigation measures are necessary.

2.2 FINDING

The discussion in this addendum confirms that the proposed project has been evaluated for potential impacts pursuant to CEQA. The discussion is meaningfully different than a determination that a project is "exempt" from CEQA review, as the Proposed Project is not exempt. Rather, the determination here is that the General Plan EIR evaluated the physical impacts likely to result from future development. As the Proposed Project does not make any substantial land use changes than what was analyzed in the General Plan EIR. This Addendum amends the General Plan EIR to reflect the Proposed Project and provides a sufficient and adequate analysis of the environmental impacts of the Proposed Project.

2. CEQA Analysis

The following identifies the standards set forth in Section 15162 of the CEQA Guidelines as they relate to the proposed project. The text that follows the provisions of the law relates to the Proposed Project.

1. **No substantial changes are proposed in the project 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.**

   The program changes included in the Proposed Project are limited to complying with State law, combining programs with similar intent to aid in implementation, or elimination of programs where the County has already completed the identified task. The Proposed 2024-2029 Housing Element would change a group of parcels from Business Park to Medium Density Residential by 2026 which would require an independent environmental analysis. However, these changes envisioned by Program 3.A.c are essentially a shift from one intensive development designation (Business Park) to another (Medium Density Residential) which were already planned in mind for commercial development, and therefore the change to residential development would not result in substantial changes from previous land use designations of the site. All development in the County must be consistent with the General Plan, and if a discretionary action, would also be subject to CEQA.

   While Program 3.A.c: General Plan Amendments to Facilitate Residential Development would alter the development pattern for the County, the change would occur on sites already designated and zoned for development. All future projects would be subject to General Plan and policies identified in the General Plan EIR to reduce the physical environmental effects would continue to apply and would reduce impacts to the same significance level that was identified in the General Plan EIR.

2. **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 EIR was certified shows:**

   a. **The project will have one or more significant effects not discussed in the previous EIR.**

   The policies identified in the General Plan EIR to reduce physical environmental effects would also apply to the proposed project. The Proposed Project's programs are similar to the existing programs of the General Plan. The Proposed Project includes four amended programs and six new programs. These amended and new programs would not result in new significant environmental impacts. The County's General Plan provides for housing growth in the County over time. The Proposed Project identifies targets for housing at different income levels but does not include development of an unusual type, scale, or location that would not have been evaluated in the General Plan EIR. Because a development project must be consistent with the General Plan and development standards of the County, the policies to address physical impacts on the environment would be applied, resulting in the same impacts as evaluated in the General Plan EIR. Therefore, there would be no new environmental impacts.

   b. **Significant effects previously examined will be substantially more severe than shown in the previous EIR.**

Because the development types envisioned by the proposed housing element which would consist of medium density residential homes which are identical to the housing types in the existing General Plan, the proposed project would have the same impacts as those disclosed in the certified General Plan EIR. The General Plan EIR identified significant and unavoidable impacts related to transportation and air quality. The policies identified in the General Plan EIR to reduce physical environmental effects would also apply to the proposed project. Because the proposed project does not include land use changes and the new and amended programs would not affect land use patterns in the County or result in physical changes to the environment, there would be no new or more severe significant impacts associated with the Proposed Project.

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.

As the proposed project would not result in new or substantially worsened impacts, there is no need to evaluate new mitigation measures or alternatives.

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.

No new mitigation measures are needed as the proposed project does not result in new or worsened significant impacts.

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 determined by CEQA Guidelines Section 15164(b) is an addendum. Accordingly, this EIR addendum has been prepared.

2.3 REFERENCES

Department of Finance (DOF). 2023. E-5 Population and Housing Estimates for Cities, Counties, and the State, 2020-2023. https://dof.ca.gov/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2023/