

ATTACHMENT 2

**CALIFORNIA ENVIRONMENTAL QUALITY (CEQA) ADDENDUM TO THE
GENERAL PLAN UPDATE PROGRAM ENVIRONMENTAL IMPACT REPORT
(State Clearinghouse # 2007012089) October 23, 2017**

**For the
2019 HUMBOLDT COUNTY HOUSING ELEMENT UPDATE**

1.0 Introduction

This Addendum to the Certified Humboldt County General Plan Program Environmental Impact Report (EIR) (State Clearinghouse No. 2007012089) has been prepared by the Humboldt County Planning Department in conformance with the California Environmental Quality Act (CEQA) (Public Resources Code § 21000 et seq.), and the CEQA Guidelines (Cal. Code Regs., Title 14, Chapter 3 § 15000 et seq.). The Addendum evaluates the potential environmental impacts of implementing changes to the 2017 General Plan, as a result of the 2019 Housing Element Update.

State law (California Government Code §§ 65580–65589.8) requires that jurisdictions evaluate their housing elements every five to eight years. The proposed Housing Element Update (6th Cycle) covers the planning period 2019 through 2027; it is a comprehensive update of the adopted 2014-2019 Housing Element. The Housing Element, which is one of 12 General Plan Elements, consists of two parts: *Appendix G* provides the most current technical background data necessary to understand the context for planning the County's housing; and *Chapter 8* of the General Plan uses the data contained in Appendix G to revise the goals, policies, standards, and implementation measures to address the identified housing needs.

1.0 Background and Tiering

The Final Environmental Impact Report (SCH# 2007012089) (EIR) for the Humboldt County General Plan Update was adopted September 25, 2017. This program EIR is a first-tier environmental document that assesses the impacts that can be expected to occur from the adoption and implementation of the General Plan Update during the planning period from 2017 to 2040, including Chapter 8, the Housing Element, which covers the period from 2014-2019.

As a part of the General Plan, the Housing Element update is appropriately tiered from the EIR because it (1) is geographically coincident with the General Plan; (2) is a logical and foreseeable part of its contemplated action; (3) deals with regulations, plans, and other criteria to implement a continuing program; and (4) falls under the same authorizing statutory and regulatory authority and has generally similar environmental effects which can be mitigated in similar ways (see CEQA Guidelines §15168(a)).

The Housing Element Update (the Project) is a planned activity within the EIR and is anticipated in that document. When determining whether later activities under a Program EIR require an additional environmental document, §15168(c) states, in relevant part:

- (c) Use with Later Activities. Later activities in the program must be examined in the light of the program EIR to determine whether an additional environmental document must be prepared.

This Addendum evaluates the Project's environmental effects in the light of the program EIR.

Further, § 15168(c)(5) states that when a PEIR provides a description of later activities that would implement the program and deals with the effects of the program as specifically and comprehensively as possible, "the later activities could be found to be within the scope of the project described in the program EIR, and no further environmental documents would be required". Section 2.6 of the PEIR describes the Housing Element update process and sets the criteria for additional environmental review: Each Housing Element update must examine and utilize the most current population and housing data and growth forecasts. If in the future it becomes clear that the General Plan DEIR forecasts in this document are no longer valid, subsequent environmental review will be required for any action which could otherwise tier off this

General Plan EIR. Sections 3.1 and 3.2 of this Addendum demonstrate that the most current population and housing data and growth forecasts are in accord with the forecasts in the EIR, and confirm their validity for the planning period 2019-2027. Section 3.3 evaluates whether the Project results in new or substantially more severe significant effects not discussed in the EIR. Section 3.4 examines whether new information of substantial could affect the adequacy of the PEIR.

1.2 Prior EIRs Incorporated by Reference

This Addendum addresses updates and minor changes to the 2014 Housing Element, which was evaluated in an Addendum to SCH 2009022077, the Draft and Final Supplemental Environmental Impact Report (SEIR) adopted for the 2009 Housing Element. A separate, Subsequent Environmental Impact Report (subsequent to SCH 2009022077) was drafted and adopted August 23, 2011 to assess the environmental effects of implementing two (2) Multifamily Rezoning programs in the 2009 Housing Element that would increase the multifamily development potential by 980 units countywide. In certifying the above documents, the Board of Supervisors made findings based on substantial evidence that the benefits of implementing the Housing Element outweighed the unavoidable environmental effects, and adopted a Statement of Overriding Conditions.

Background information and analysis from the following documents were used to prepare this Addendum to the EIR. They are a matter of public record and are hereby incorporated by reference.

- [2017 General Plan Update Final and Revised Draft Program EIR \(SCH 2007012089\);](#)
- [2014 Housing Element Update Addendum to the SEIR \(SCH 2009022077\);](#)
- [2009 Housing Element Supplementary Environmental Impact Report \(SCH 2009022077\);](#)
- [2009 Multifamily Rezone Subsequent Environmental Impact Report \(SCH 2009022077\).](#)

The documents are available for review during regular business hours at the Humboldt County Planning and Building Department at 3015 H Street, Eureka; or online at <https://humboldt.gov/2448/2019-Housing-Element>.

The goals, policies, standards, and implementation measures that make up the Project, and the subject of this Addendum, are contained in the *2019 Housing Element Policy and Program*, attached here as Exhibit A.

1.3 Statutory Authority and Requirements

CEQA Guidelines § 15164(a) states the following with respect to an Addendum to an EIR:

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.

CEQA Guidelines § 15162, *Subsequent EIRs and Negative Declarations*, states the following with respect to Subsequent EIRs:

(a) When an EIR has been certified or a 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 the 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.

The County of Humboldt is the Lead Agency. The Humboldt County Planning Commission and Humboldt County Board of Supervisors have approval authority over the General Plan Program and the Housing Element, upon approval from the State Department of Housing and Community Development (HCD).

1.4 Summary of Analysis and Findings for an Addendum

The 2019 Housing Element Update (the Project) analyzed is limited to the County's housing policy and program of actions to support those policies. New population, projected growth, and other data evaluated in the Element confirm the assumptions of the 2017 General Plan Update, and revise population growth projections slightly downward. No unknown or unforeseeable factors have altered the validity of forecasts underlying the General Plan Update, including the Housing Element. The Project does not involve changes that would result in new or more severe physical impacts, change land use designation, or rezoning with potential to increase development capacities. In re-examining the mitigation measures of the PEIR, no newly feasible or different measures or alternatives were found that would substantially reduce potential significant effects of the project. Section 3.3 of this Addendum presents evidence supporting the decision not to prepare a subsequent EIR pursuant to §15162.

Based on the new data, and the evaluation of the potential environmental impacts resulting from the Project, none of the conditions described in CEQA Guidelines § 15162 have occurred, and this Addendum was prepared.

2.0 Project Description

The 2019 Housing Element Update (the Project) is a scheduled update to the General Plan that uses the most recent population data, housing data, and growth forecasts to revise policy, standards, and programs to guide future growth and development for the unincorporated portions of Humboldt County.

2.1 Project Location and Setting

A complete description of the project location and setting can be found in [Section 2.1 of the General Plan Program Environmental Impact Report](#). The proposed Project applies to all unincorporated areas the county, including the 22 Community Planning Areas (CPAs) and six (6) Coastal Zone Planning Areas established by the County. Although the land area of incorporated cities comprises only 1% of the total land area, just under half (46%) of the County's population of 136,002 lived within cities in 2018. That leaves 72,865 people, or 54% of the county's population, in unincorporated areas subject to this Housing Element Update. The 2019 Housing Element includes demographic and housing statistics, and growth projections for the County available as of 2019.

2.2 Project Characteristics

Previous environmental review analyzed the potential effects of Housing Element Programs, including:

- establishment of Housing Opportunity Zones;
- incentives for affordable and special needs housing;
- requirements for a mixture of housing sizes and types;
- protecting multifamily uses in the affordable multifamily land inventory;
- residential density bonuses;
- programs to support establishment of single room occupancy housing units;
- appropriate zones for emergency shelters, supportive and transitional housing;
- retaining legal non-conforming housing;
- establishing density standards for the residential Multifamily Land Use Designation; and
- updating standards for alternative owner-built/owner-occupied housing.

The programs and actions above have not resulted in adequate housing production during the last planning period. The County has achieved about 60% of its target housing between 2014 and 2018. The 2019 update continues the programs listed, but adds clarity, detail, and incremental modifications in order to improve the results.

Development in the County is carried out according to the General Plan through these instruments:

- **Goals and Policies:** Presents goals and policies to set direction and guide decisions associated with the topic.
- **Standards:** Identifies the standards that will be used to apply policies to a given situation.
- **Implementation Measures:** Identifies measures that will be taken to implement the Plan.

The Project would add new goals, policies, standards, and implementation measures, as well as

revise, and delete obsolete and completed measures contained in 2014 Housing Element. No existing measures that are intended to lessen environmental impacts resulting from the Housing Element are proposed to be deleted. The changes related to the Project are contained in the *2019 Housing Element Policy and Program* (Exhibit A). The full text of the 2014-2019 Housing Element is contained in the 2017 General Plan Update, available for review on the County's website ([2017 GP Chapter 8 Housing Element](#)) and incorporated into this Addendum by reference.

2.3 Summary of Changes Resulting from the Project

Minor changes were made to Chapter 8, the Housing Element, in Sections 8.1-8.3, that update demographic, economic, and housing characteristics, projected housing needs, effectiveness of the previous element, land inventory, new state law, and funding for housing programs. These changes are non-substantive and editorial. The new data validates and continues trends set forth in previous documents (see Section 3.1 below).

Changes were made to goals, policies, standards, and implementation measures in Sections 8.4, 8.5, 8.6 and 8.7 of Chapter 8, including consolidation and renumbering of features from the previous Element. Some of the changes have the potential to indirectly impact the physical environment.

For the purpose of environmental analysis, all of the goals, policies, standards, and implementation measures in the *2019 Housing Element Policy and Program* document were examined in light of their potential direct or reasonably foreseeable indirect impacts on the environmental factors enumerated in the CEQA Guidelines, Appendix G. Three categories are summarized here, and listed in full in Exhibit B. The analysis of relevant changes follows in Section 3.0 below.

CEQA Status of Unchanged Goals, Policies, Standards, and Implementation Measures: A substantial number of goals, policies, standards, and implementation measures are left unchanged from the previous Housing Element cycle. These were addressed in previous environmental documents, and are not further evaluated. They are listed in Table 2.3-1 of Exhibit B.

CEQA Status of Non-Substantive and Exempt Changes: Another group consists of non-substantive changes, including actions that are not a project under CEQA §15378(b)(5), or are exempt as involving rehabilitation or replacement of existing structures under CEQA §15302.

1. H-P6, H-P10, H-P14, H-P42, H-S2, H-IM6, H-IM9, H-IM12, H-IM15, H-IM17, H-IM20, H-IM27, and H-IM63 involve text edits and minor updated language;
2. H-P24, H-P26, H-P34, H-IM31, H-IM34, H-IM36, H-IM43, H-IM45, H-IM48, and H-IM46 have to do with internal review, process improvements, audit actions, and data analysis to support decision-making ;
3. H-P27, H-P28, H-P29, H-P41, H-IM3, H-IM18, H-IM23, H-IM24, H-IM25, H-IM28, H-IM29, H-IM33, H-IM49, H-IM62, H-IM64, and H-IM67 make improvements to services and public accessibility;
4. H-P38, H-P45, and H-IM21 have to do with interagency coordination and support that does not involve physical activity;
5. H-P30, H-S9, H-IM5, H-IM14, H-IM23, H-IM29, H-IM31, H-IM33, H-IM34, and H-IM3711 (2014 numbers) delete measures that are obsolete, completed, or incorporated elsewhere;
6. H-G7, H-P25, H-P31, H-P32, H-P33, H-P36, H-S8, H-IM51, and H-IM52 are policy refinements that

do not involve physical changes to the environment, or are enacted later through implementation measures (analyzed in Section 3.3); and

7. H-P37, H-S6, H-IM35, H-IM53, H-IM54, and H-IM65 implement programs to preserve and rehabilitate existing housing.

Because they do not result in physical changes to the environment or are otherwise exempt, no further evaluation is made of the above group. The full text of these measures is listed in Table 2.3-2 of Exhibit B. The environmental analysis in Section 3.3 focuses on the third set of goals, policies, standards, and implementation measures, which have potential to impact the physical environmental. Those actions are listed in Table 2.3-3 of Exhibit B. Each action with potential environmental impact was examined in the light of the Program EIR to determine whether there were effects not previously examined; whether effects could be significantly more severe than anticipated in the PEIR; or whether different or newly feasible mitigation measures or alternatives could substantially reduce one or more environmental impacts.

3.0 Evidence Supporting the Addendum

This section compares actions in the proposed *2019 Housing Element Policy and Program* to those incorporated in the 2017 General Plan Update (including in the 2014 Housing Element) to determine whether any of the conditions in § 15162 have occurred. The decision-making body shall consider this addendum to the final certified 2017 General Plan Update PEIR prior to making a decision on the project.

3.1 Updated Population, Housing, and Growth Forecasts Do Not Require Major Revisions

Under CEQA Guidelines § 15162(a)(1), a new EIR must be prepared when a project proposes substantial changes that require major revisions. The Housing Element update is a planned activity described in the EIR, Section 2.6:

“The Housing Element of the General Plan must be updated every five to eight years. Each Housing Element update must examine and utilize the most current population and housing data and growth forecasts. If in the future it becomes clear that the General Plan [P]EIR forecasts in this document are no longer valid, subsequent environmental review will be required for any action which could otherwise tier off this General Plan EIR.”

Current analysis presented in the technical background report (Housing Element Appendix G) finds that the 2018 population and housing data, and growth forecasts set forth in this Project are in accord with the forecasts in the EIR, and in fact show a slight drop in population growth. Therefore, the assumptions made in the EIR for the planning period 2017-2040 are confirmed as valid so far, and do not require major project revisions.

Population and Growth Forecasts

The EIR analyzed the environmental impacts of the residential growth projected between 2017 and 2040, with peak growth in 2028. Appendix T to that document states the assumptions and methodology used in preparing development projections. Based on California Department of Finance (DOF) data, population growth in the county was projected to peak at 141,441 persons in 2028. The EIR used the population in 2028 as the point at which the maximum level of impacts will be realized. The years between 2028-2040 were to see a decline in the population.

The DOF updated those projections in 2019, and they project a slightly lower peak population of 141,243 for the County occurring later, in 2040. After that, the same slow decline is projected

through 2060. The maximum population for the County during the Element's planning period is projected to occur in 2027, with a population of 138,783.

These projections, shown in table below, demonstrate that the population in the County as a whole is slightly less than projected in the 2017 EIR; that the peak population of 141,441 projected in the EIR is now adjusted downward to 138,984 for that year; and that growth through the planning period of 2019-2027 is projected to be more modest than previously predicted.

Table 3.1-1 Humboldt County Total Population Projections, 2010 - 2060

	2010	2018	2020	2028	2030	2040	2050	2060
2017 EIR Population ¹	134,623		139,033	141,441	140,608	138,307	134,509	134,398
2019 HE Update Population ¹		135,627	136,621	138,984	139,393	140,243	139,759	139,520
Source 2017 data:	<i>DOF Reports and Research Papers - P1 Population Projections, December 2014, and P2 State and County</i>							
Source 2019 data:	<i>California DOF, State Population Projections, Table P-1, Total Population by County 2010-2060.</i>							
Notes:	1 Population is for the whole county, including the seven incorporated cities							

Because there is no evidence that population growth will accelerate, or that sustained development at a higher rate is likely to occur, the DOF projection used in the EIR is still valid, and it accounts for more population than is expected according to the current Project.

Housing Demand

Appendix T of the EIR describes a methodology to predict the number of housing units that would be required to be built to meet the needs of the peak population in 2028, as projected by the DOF data available at the time. By that method, the unincorporated County's share of the additional dwelling units needed to accommodate the anticipated peak population was 1,721 units, or about 4 percent of the development potential.

Standard H-S1, set forth in the Project, presents a reasonable estimate of residential development proposed by for the unincorporated County for the 2019-2027 cycle, based on historic building permit data and other analyses developed in the technical background report. The Project estimates: 602 single family units; 186 multifamily units; and 91 second units, totaling 879 units. This represents a rate of about 110 units per year, a downward projected rate compared with the previous Housing Element, and less than the assumptions used in the 2017 General Plan Update. The previous 2014 Element called for 814 single family units; 206 multifamily units; and 113 second units for a total of 1133 units for the 5 years between 2014 and 2018. Less than half that many, 549 units, were actually built, giving an actual rate of 110 units per year last cycle.

About 220 units were actually built in the years 2017 and 2018, so that 1501 of the 1721 units projected in the GP Update (2017-2028) remain to be built under that projection, representing a rate of 167 units per year. The current Project sets a quantified objective of 879 units by 2027, or 110 units per year. Compared with the projections used in the 2017 General Plan Update, the Project proposes fewer units than was previously anticipated.

Since population growth and housing needs are projected to be less than that considered in the EIR, the environmental impacts evaluated in that document encompass development activities

in the proposed Project. Therefore, in light of the EIR, no increased impacts are anticipated based on the number of units to be built, and the Project has not changed so as to require major revisions.

3.2 The Project Circumstances are Not Substantially Changed

CEQA Guidelines § 15162(a)(2) prescribes a new EIR when changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR.

The 2017 General Plan Update was undertaken in a period of slow economic and population growth, with a concurrent slow rate of housing production. The previous Housing Element spans the years 2014-2018 and was undertaken under those same conditions. Historical data from building permits, as detailed in the technical background report show that these conditions continue in 2019. Physical conditions, geography, and infrastructure limitations present the same constraints that dictated housing and economic growth in the previous Housing Element cycle. None of the evidence examined in the technical background report suggests a change in these conditions is likely. Further, the adoption of the 2019 Housing Element only involves updates to data, analysis and programs and does not in itself directly result in new development or physical changes to the environment.

Analysis of current conditions finds no changes in circumstances under which the project is undertaken have occurred, that would produce new significant environmental effects or substantially increased severity of previously identified significant effects. Therefore no major revisions to the Project are required.

3.3 Environmental Impact Analysis

CEQA Guidelines § 15162(a)(3) prescribe an additional EIR when a project results in new or substantially more severe significant effects not discussed in the previous EIR.

The 2019 Housing Element supports development of housing, and will continue to have the same impacts on the environment described as significant and unavoidable in the previous EIRs. The EIR recognized significant and unavoidable impacts related to development, as did previous environmental documents. Those include Aesthetics, Agricultural Resources, Air Quality, Cultural Resources, Energy, Geology/Soils, Greenhouse Gas Emissions, Hydrology/Water Quality, Transportation, Utilities and Service Systems, Wildfire, and Mandatory Findings of Significance (Cumulative Impacts). In certifying previous EIRs, the Board of Supervisors made findings based on substantial evidence that the benefits of implementing the Housing Element outweighed the unavoidable environmental effects, and adopted a Statement of Overriding Conditions.

However, this Addendum examines the potential, indirect environmental impacts of the new policies, standards, and implementation measures in light of the Program EIR to determine whether there are effects not previously examined, or substantially more severe.

3.3.1 Aesthetics

Section 3.16 of the EIR evaluates environmental effects related to Aesthetics. The General Plan estimates that 1,721 housing units will be needed to accommodate the peak population in the unincorporated area between 2017 and 2028; 220 were built in combined years 2017 and 2018. That analysis found that development in undeveloped areas, even at low densities, and could permanently change scenic views throughout Humboldt County, having potentially significant aesthetic impacts.

Policies. General Plan policies emphasize land use compatibility and the preservation of resource and open space areas. The majority of residential development for the Update planning period is projected to occur within already urbanized areas or areas planned for urbanized development. Implementation of scenic resources policies would ensure that projects are designed in a manner that would lessen significant impacts to aesthetic resources in the County.

Mitigation. Mitigation for aesthetic impacts include a program to identify and protect landmark trees, amending the Zoning Regulations to include lighting design guidelines, and other measures to limit dividing communities or otherwise degrade public views. Developing more housing would have a significant unavoidable impact after mitigation. In certifying previous EIRS, the Board of Supervisors made findings based on substantial evidence that the benefits of implementing the Housing Element outweighed the unavoidable environmental effects, and adopted a Statement of Overriding Conditions.

Relevant Project Components. The following Project components could have potential indirect impacts to aesthetic resources.

H-P3	H-S1	H-IM37	H-IM41	H-IM58
H-P12	H-IM2	H-IM38	H-IM42	H-IM61
H-P35	H-IM14	H-IM39	H-IM44	H-IM66
H-P39	H-IM22	H-IM40	H-IM56	

Impact Analysis. While these Project measures could indirectly result in aesthetic impacts attributable to residential development, they would not result in new effects, or a significant increase in the severity of residual impacts. Based on historic building data and the best available estimates, the 2019 Element proposes to produce fewer units than the number evaluated in the EIR. The policies and mitigation measures imposed by the PEIR would remain the same, and would apply to any development resulting from the above measures. In light of the Program EIR, the Project would not introduce new aesthetic effects not previously examined, or that are substantially more severe.

3.3.2 Agriculture and Forestry Resources

Section 3.2 of the EIR evaluates environmental effects related to Agriculture and Forestry Resources. That analysis found Plan policies partially mitigate the loss of agricultural lands by identifying policies and programs to help protect and preserve these lands. However, the loss of agricultural lands cannot be mitigated to a level of insignificance once land is permanently converted to non-agricultural land use, and therefore, is a significant unavoidable impact of the General Plan Update. The Board of Supervisors made findings that the benefits of implementing the Housing Element outweighed the unavoidable environmental effects.

Policies. Numerous policies contained in the General Plan, community plans, and coastal plans protect agricultural uses and agricultural lands.

Mitigation. No feasible mitigation.

Relevant Project Components. The following Project components could have potential indirect impacts to agricultural resources.

H-P39	H-IM38	H-IM42	H-IM57
H-P40	H-IM39	H-IM44	H-IM58

H-S1	H-IM40	H-IM50	H-IM61
H-IM37	H-IM41	H-IM56	H-IM66

Impact Analysis. Policies, standards, and implementation measures in this group indirectly promote development of housing with incentives and fee deferrals; expand the definitions of housing to include smaller and mobile units; and allow multifamily housing in different configurations. H-IM50 includes a farm employee housing program implements state mandated by-right permitting on agricultural lands. Some measures listed could potentially and indirectly make conversion of agricultural or forest lands more likely by encouraging housing in undeveloped areas. However, the Project does not involve changes in land use designation changes or rezoning. In addition, Project measures encourage housing development mainly in areas with urban level services and in Housing Opportunity Zones, which would reduce impacts on agricultural resources compared to the earlier versions of the Element, because agricultural uses tend to occur on lands outside areas served by public water and sewer. The Project proposes fewer units than the number evaluated in the EIR, therefore, in light of the PEIR, the project's impacts on agricultural and forest lands would not introduce new effects not previously examined, or that are substantially more severe.

3.3.3 Air Quality

Section 3.12 of the EIR evaluates environmental effects related to Air Quality. Humboldt County is in attainment of all federal and state criteria air pollutant standards, except for State PM₁₀ levels, for which the entire North Coast Air Basin, including Humboldt County, is currently designated as a non-attainment area. For this reason, increases in PM₁₀ emissions that could increase exceedances are significant, and therefore, although applying the General Plan Update policies and standards would reduce impacts that might otherwise be greater, the impacts remain significant and unavoidable. In certifying the EIR and previous Housing Elements, the Board of Supervisors made findings that the benefits of implementing the Housing Element outweighed the unavoidable environmental effects.

Policies. The relevant General Plan Update policies and programs concerning air quality are described in section 3.12.4.1 of the EIR. They include regulating land uses to avoid or mitigate air emissions to sensitive receptors, and requirements to reduce impacts of project related objectionable odors to less than significant.

Mitigation. Mitigation measures related to pollutants include controlling development adjacent to potential sources of toxic pollutants, and avoiding or mitigating harmful or nuisance levels of air emissions near sensitive receptors. While a NCUAQMD PM₁₀ Attainment Plan is in effect, no feasible mitigation measures have been identified that would reduce PM₁₀ to a level less than significant.

Relevant Project Components. The following Project components could have potential indirect impacts to air quality.

H-P3	H-IM2	H-IM40	H-IM56
H-P12	H-IM14	H-IM41	H-IM57
H-P39	H-IM22	H-IM42	H-IM58
H-P40	H-IM37	H-IM44	H-IM61
H-S1	H-IM38	H-IM50	H-IM66
H-S14	H-IM39	H-IM55	

Impact Analysis. All the above measures could indirectly impact air quality by stimulating development of new housing. However, measures H-IM38, H-IM40, H-IM50, and H-IM58 are intended to develop housing in smaller, unincorporated communities where services are

available, so that people working in those areas would not need to commute from larger urban areas. Overall, the Project proposes to produce fewer units than the number evaluated in the EIR, and potential impacts to air quality are within that analysis. In light of the PEIR, the project's potential impacts on air quality do not exceed those previously considered.

3.3.4 Biological Resources

Section 3.11 of the EIR evaluates environmental effects related to Biological Resources, and finds the impacts of the General Plan Update to be less than significant as mitigated.

Mitigation. Species protection is assured by assessing development impacts on species diversity in coastal areas, wetlands, mapped sensitive habitats, threatened/endangered species ranges and in SMA's as part of the review process for discretionary permits. The PEIR redefines wetlands; restricts development and adds buffers around wildlife corridors and nursery sites; and maps biological resources to reduce potential conflicts.

Relevant Project Components. The following Project components could have potential indirect impacts to Biological Resources.

H-P3	H-IM2	H-IM40	H-IM56
H-P12	H-IM14	H-IM41	H-IM57
H-P39	H-IM22	H-IM42	H-IM58
H-P40	H-IM37	H-IM44	H-IM66
H-S1	H-IM38	H-IM50	
H-S14	H-IM39	H-IM55	

Impact Analysis. Indirect impacts could potentially result from development adjacent to wetlands or natural areas facilitated by the Project. However, the mitigation measures outlined in the General Plan reduced impacts to less than significant levels when analyzed in the PEIR, and those would be imposed on any subsequent development of the affected areas. Overall, the Project proposes fewer units than the number evaluated in the EIR. Therefore, mitigation already in place would reduce any impacts of the Project to a less than significant level.

3.3.5 Cultural Resources

Section 3.14 of the EIR evaluates environmental effects related to Cultural Resources. The General Plan Update contains policies, standards and implementation measures which protect historical and archaeological resources or mitigate impacts to them. In the case of historic structures, potential impacts remain significant and unavoidable.

Mitigation. Mitigation measures in the EIR identify significant cultural resources; consult established registries; prescribe a process for identification, evaluation, assessment and treatment of discovered resources; and map the resource areas, among other programs. However, potential impacts to historic structures cannot be reduced to a less than significant level.

Relevant Project Components. The following Project components could have potential indirect impacts to Cultural Resources.

H-P3	H-IM2	H-IM42	H-IM58
H-P12	H-IM37	H-IM44	H-IM66
H-P39	H-IM38	H-IM50	
H-P40	H-IM39	H-IM55	
H-S1	H-IM40	H-IM56	

Impact Analysis. The Project focuses housing development mainly in previously developed areas, which would reduce potential impacts on cultural resources. All the proposed residential development would be subject to policies and mitigation set forth in the General Plan Update. The Project proposes to produce fewer units than the number evaluated in the EIR. In light of the PEIR, the project's impacts on cultural resources are less than significant.

3.3.6 Energy

Section 3.17 of the EIR evaluates environmental effects related to Energy, including the buildout of approximately 1,721 (updated to 1501 as of 2019) new housing units, and associated commercial and industrial buildings. The PEIR considers energy consumption during construction and occupancy of homes and other buildings, in terms of their adverse physical effect on the environment. Impacts of new or expanded energy production or transmission facilities were found to be less than significant. Because mechanisms to evaluate whether energy consumption is wasteful, inefficient, or unnecessarily consumptive are not yet fully developed (i.e. adopted GHG thresholds and Climate Action Plan (CAP)), this impact was conservatively determined to be significant and unavoidable. In certifying the EIR and previous Housing Elements, the Board of Supervisors made findings that the benefits of implementing the Housing Element outweighed the unavoidable environmental effects.

Policies. General Plan land use maps and policy promote energy conservation by:

- Generally maintain the characteristics of existing communities.
- Apply land use designations that support mixed-use development and other techniques to increase efficiency of land utilization, including the use of alternative subdivision standards, density bonuses, second unit incentives, live-work commercial centers, etc.
- Maintain current planned residential densities outside of community planning areas and facilitate opportunities for second residential units.
- Increase available resource production land protections using a range of planning tools such as clustered development incentives, open space standards, conservation easements and regulatory reform.
- The Land Use Element includes policies and programs to promote mixed use development, which places higher density residential development adjacent to jobs and shopping. UL-P6, Mixed-Use Zoning, directs the application of mixed-use zones in Urban Development Areas.

The following non-regulatory energy efficiency support programs are administered by Redwood Coast Energy Authority (RCEA) and PG&E:

- Community Choice Energy program (option to purchase cleaner electricity at competitive prices);
- Property Assessed Clean Energy (PACE) (funding program includes unincorporated area properties)
- Development Authority (CSCDA) Open PACE programs (financing to residential and commercial property owners for renewable energy and efficiency improvements);
- Grid Alternatives (non-profit that provides local job training and solar at no-cost for families with limited incomes);
- USDA Rural Energy Assistance Program (REAP) Renewable Energy Systems and Energy Efficiency Improvement Loans and Grants (guaranteed loans and grants to agricultural producers and rural small businesses);

- Low-Income Programs (income qualified services through the Redwood Community Action Agency);
- PG&E 3 Party Programs (assist customers in saving energy);
- PG&E Core Rebates (offset the incremental cost of eligible energy efficiency measures);
- PG&E Customized Retrofit Incentives (non-residential customers, permanent peak demand reduction);
- Above Code Support (designers and owners to exceed California's Title 24 energy-efficiency standards).

Relevant Project Components. The following Project components could have potential indirect impacts to Energy.

H-P12	H-S14	H-IM40
H-P39	H-IM37	H-IM50
H-P40	H-IM38	H-IM55
H-S1	H-IM39	H-IM58

Impact Analysis. New data in 2019 confirms that the current pattern of development within the County is not expected to change substantially during the Project planning period. In addition to furthering the policies outlined above, the Project proposes new policies, measures, and programs to support mixed uses in developed areas, and places homes near work and business, thereby reducing travel distances. Implementation measures H-IM39 through H-IM41, and H-IM58 promote smaller unit size and alternative configurations that not only reduce cost, but have the energy benefits of reduced energy footprints. Overall, the Project proposes fewer units than the number evaluated in the EIR. In light of the above and because all regulations, building codes, and Plan policies and incentives would apply to site-specific actions, the project's potential impacts on energy would not introduce new effects not previously examined, or that are substantially more severe those considered in the PEIR.

3.3.6 Geology and Soils

Section 3.8 of the EIR evaluates environmental effects related to Geology and Soils. Due to Humboldt County's proximity to the Cascadia Subduction Zone, it is subject to a high concentration of earthquake events, and liquefaction and subsidence hazards. It is not feasible to mitigate potential exposure of persons to geologic hazards to a less than significant level.

Mitigation. Mitigation measures lessen impacts to water quality resulting from increased erosion, and unstable areas are addressed through geological report requirements. Requirements of the Basin Plan and state law mitigate potential for impacts resulting from development in areas incapable of adequately supporting the use of septic systems. No feasible mitigation measures are available to reduce the exposure to severe surface fault rupture events.

Relevant Project Components. The following Project components could have potential indirect impacts to Geology and Soils.

H-P3	H-IM2	H-IM40	H-IM56
H-P12	H-IM14	H-IM41	H-IM57
H-P39	H-IM22	H-IM42	H-IM58
H-P40	H-IM37	H-IM44	H-IM61
H-S1	H-IM38	H-IM50	H-IM66
H-S14	H-IM39	H-IM55	

Impact Analysis. The above measures could indirectly impact conditions related to geology and soils by stimulating development of new housing. However, the Project proposes to produce fewer units than the number evaluated in the EIR. In light of the PEIR, the project's potential impacts on energy would not introduce new effects not previously examined, or that are substantially more severe those considered in the PEIR.

3.3.7 Greenhouse Gas Emissions

Section 3.13 of the EIR evaluates environmental effects related to Greenhouse Gas Emissions. Because development necessarily generates greenhouse gasses, and it is not feasible at this time to ensure that emissions fall below an adopted GHG emissions threshold, the PEIR considers the impact significant and unavoidable. In certifying the EIR, the Board of Supervisors made findings that the benefits of implementing the Housing Element outweighed the unavoidable environmental effects

Mitigation. The PEIR lists policies, standards, and implementation measures in section 3.13.4 that mitigate the generation of GHG. Additional reductions would be achieved by CAP actions that the County may develop that encourage the use of alternatively fueled and electrified equipment.

Relevant Project Components. The following Project components could have potential indirect impacts to Greenhouse Gas Emissions.

H-P3	H-IM2	H-IM40	H-IM56
H-P12	H-IM14	H-IM41	H-IM57
H-P39	H-IM22	H-IM42	H-IM58
H-P40	H-IM37	H-IM44	H-IM61
H-S1	H-IM38	H-IM50	H-IM66
H-S14	H-IM39	H-IM55	

Impact Analysis. All the above measures could indirectly impact greenhouse gas emissions by stimulating development of new housing. Because the Project proposes fewer units than the number evaluated in the EIR, it would not result in additional vehicular trips, nor increased emissions from residential energy demand beyond what is considered in the PEIR. In addition, implementation measures H-IM39 through H-IM41, and H-IM58 promote smaller unit size and alternative configurations that not only reduce cost, but have the energy benefits of reduced energy footprints. Those same measures, as well as H-IM50, and H-IM58 are intended to promote housing in smaller, unincorporated communities where services are available, so that people working in those areas would not need to commute from larger urban areas. In light of the PEIR, the project's potential impacts on greenhouse gas emissions would not be more severe than those previously considered.

3.3.8 Hazards and Hazardous Materials

Section 3.7 of the EIR evaluates environmental effects related to Hazards and Hazardous Materials, and finds that General Plan policies and land use regulations mitigate the environmental impacts to less than significant.

Mitigation. Implementation of pre-disaster mitigation and emergency operations planning; use of maximum residential densities and building occupancies consistent with the Recommended Compatibility Zones; an Airport Land Use Compatibility Zone Overlay; and an Airport Safety Review Combining Zone would reduce the risks to less than significant.

Relevant Project Components. The following Project components could have potential indirect impacts to Hazards and Hazardous Materials.

H-P12	H-IM38	H-IM42
H-P39	H-IM39	H-IM50
H-P40	H-IM40	H-IM55
H-S1	H-IM41	H-IM56

Impact Analysis. Indirect impacts could potentially result from the development facilitated by the Project if it occurs near sites where hazardous materials exist. However, the mitigation measures outlined in the General Plan would be imposed on any subsequent development of the affected areas. In light of the PEIR, mitigation already in place would reduce any impacts of the Project to a less than significant level.

3.3.9 Hydrology and Water Quality

Section 3.10 of the EIR evaluates environmental effects related to Hydrology and Water Quality. General Plan policies and land use regulations mitigate the environmental impacts to less than significant except in the area of water. A significant portion of Humboldt County drains to watersheds that are impaired by sedimentation, siltation, and temperature.

Mitigation. Mitigation measures listed in Section 3.10.3 were found to reduce adverse impacts to groundwater; effects related to the alteration of drainage patterns or increased runoff; impacts relating to development within the 100-year flood hazard area; and exposure to damage levee or dam failure, or inundation by tsunami, or mudflow to levels less than significant. However, development under the GPU within impaired watersheds could result in potentially significant hydrology and water quality impacts that could not be effectively mitigated. In certifying the EIR, the Board of Supervisors made findings that the benefits of implementing Update outweighed the unavoidable environmental effects.

Relevant Project Components. The following Project components could have potential indirect impacts to Hydrology and Water Quality.

H-P12	H-IM37	H-IM41	H-IM55	H-IM61
H-P39	H-IM38	H-IM42	H-IM56	H-IM66
H-P40	H-IM39	H-IM44	H-IM57	
H-S1	H-IM40	H-IM50	H-IM58	

Impact Analysis. Existing regulation, policies, and mitigation measures applied to new development under the Project are expected to reduce adverse impacts related to hydrology and water quality to less than significant levels, with the exception of development within impaired watersheds. The Project proposes fewer units than the number evaluated in the EIR. In light of the

PEIR, the project's potential impacts on water quality would not introduce new effects, or be substantially more severe than those previously considered.

3.3.10 Land Use and Planning

Section 3.1 of the EIR evaluates environmental effects related to Land Use and Planning, finding that the impacts of implementing the General Plan Update would be less than significant as mitigated.

Mitigation. Section 3.1.3.2 lists a series of mitigation measures that aim to resolve conflicts between the General Plan Update and applicable state laws relating to the open space and land use elements, with the result that impacts related to conflicts are reduced to less than significant levels.

Relevant Project Components. No Project components would impact land use and planning.

Impact Analysis. Policies, standards and implementation measures in the Project have indirect impacts, and do not involve land use designation or zoning changes. Actions resulting from the Project may involve these issues, but would be adopted by ordinance with further review. The minor changes proposed by the Project to encourage affordable, emergency, transitional, and supportive housing would not have a substantial direct effect on any identified land use impacts. In light of the PEIR, the project would have no potential significant impacts on land use and planning.

3.3.11 Mineral Resources

Section 3.9 of the EIR evaluates environmental effects related to Mineral Resources, finding that the impacts of implementing the General Plan would be less than significant.

Relevant Project Components. No Project components would impact mineral resources.

Impact Analysis. The minor changes proposed by the Project to encourage affordable housing and support emergency, transitional, and supportive housing would not have a substantial effect on mineral resources. In light of the PEIR, the project would have no potential significant impacts.

3.3.12 Noise

Section 3.6 of the EIR evaluates environmental effects related to Noise, finding that the impacts of implementing the General Plan Update would be less than significant as mitigated.

Mitigation. The EIR mitigates adverse impacts related to construction noise through adoption of a Noise Control Ordinance that requires noise parameters for discretionary projects, and a Noise Impact (N) Combining Zone surrounding the Garberville Airport.

Relevant Project Components. The following Project components could have potential indirect impacts related to Noise.

H-P3	H-S1	H-IM41	H-IM55	H-IM61
H-P12	H-IM14	H-IM42	H-IM56	H-IM66
H-P39	H-IM22	H-IM44	H-IM57	
H-P40	H-IM40	H-IM50	H-IM58	

Impact Analysis. Noise impacts of the Project are of the same type and extent as those considered

and mitigated in the EIR. New development would be subject to the policies and mitigation measures in place, which reduce the impacts to a level less than significant. In light of the PEIR, the potential noise impacts related to the Project would be less than significant.

3.3.13 Population and Housing

Section 3.1 of the EIR evaluates environmental effects related to Population and Housing, concluding that the Plan does not induce unplanned growth or displace substantial numbers of people or housing units. Therefore, impacts relating to population and housing of the General Plan Update are less than significant.

Mitigation. None required.

Relevant Project Components. Because Project components do not promote unplanned growth or displace people, none would have potential impacts relating to population and housing.

Impact Analysis. Like the General Plan, Project policies do not propose specific development proposals or contain policies that are intended to induce growth, but rather, they address how growth is to be accommodated. Policies, standards and implementation measures in the Project propose minor changes that do not substantially depart from the Plan's emphasis on growth accommodation. The proposed number of housing units in the Project does not exceed that evaluated in the EIR, so that its potential impacts on population and housing would not exceed those evaluated. In light of the PEIR, the potential impacts concerning population and housing would be less than significant.

3.3.14 Public Services

Section 3.4 of the EIR evaluates environmental effects related to Public Services, finding that with General Plan policies, standards and implementation measures are adequate to ensure that environmental impacts are addressed through appropriate site-specific mitigation measures. Therefore, impacts relating to Public Services are less than significant.

Mitigation. None required.

Relevant Project Components. The following Project components could have potential indirect impacts related to Public Services.

H-P3	H-S1	H-IM38	H-IM55
H-P12	H-S14	H-IM39	H-IM56
H-P35	H-IM2	H-IM40	H-IM57
H-P39	H-IM14	H-IM41	H-IM58
H-P40	H-IM22	H-IM44	H-IM61
H-P44	H-IM37	H-IM50	H-IM66

Impact Analysis. The Project's impacts relating to public services are of the same type and extent as those considered in the EIR. New public facilities could be required as a result of housing development, and these would be subject to the policies and measures in place in the General Plan, which would reduce the impacts to a level less than significant. The Project proposes fewer units than the number evaluated in the EIR. In light of the PEIR, the potential impacts of the Project related to public services would be less than significant.

3.3.15 Recreation

Section 3.15 of the EIR evaluates environmental effects related to Recreation, finding that with General Plan Update policies, and the mitigation measures below would reduce impacts relating to recreation to a level less than significant.

Policies. Policies aim to coordinate planning for park and recreation facilities to ensure that new residential development includes provisions for adequate parks and open space, and to counteract the deterioration of parks and recreation facilities.

Mitigation. Mitigation measures to protect existing parkland include: maintaining a Parks Master Plan to assess facilities; establishing a standard for parkland dedication; specifying acreage of park land of 3 acres per 1,000 residents; and specifying land dedication, in-lieu fee, or other mechanisms to fund parks and recreation.

Relevant Project Components. The following Project components could have potential indirect impacts to Recreation.

H-P3	H-S1	H-IM38	H-IM55
H-P12	H-S14	H-IM39	H-IM56
H-P35	H-IM2	H-IM40	H-IM57
H-P39	H-IM14	H-IM41	H-IM58
H-P40	H-IM22	H-IM44	H-IM61
H-P44	H-IM37	H-IM50	H-IM66

Impact Analysis. The above policies, standards, and implementation measures indirectly encourage housing development, which could potentially impact recreation. The extent of development under the Project would not exceed that evaluated in the EIR. Therefore, in light of the EIR, impacts would be less than significant.

3.3.16 Transportation

Section 3.5 of the EIR evaluates the County’s transportation system and its environmental effects. Impacts were found to be less than significant regarding road safety, and for programs for public transit, bicycle, or pedestrian facilities. Section 3.5.3 of the EIR describes transportation impacts and mitigation measures related to projected growth in the County, including addition of 1721 units between 2017 and 2028. Although the General Plan Update seeks to reduce vehicle miles traveled per capita, total vehicle miles traveled are projected to increase into the future. Mitigation may help reduce VMT per person, but political and economic conditions make reducing impacts to a less than significant level unlikely. In certifying the EIR and previous Housing Elements, the Board of Supervisors made findings that the benefits of implementing the Housing Element outweighed the unavoidable environmental effects.

Mitigation. Section 3.5.3 of the EIR describes transportation impacts and mitigation measures related to projected growth.

Relevant Project Components. The following Project components could have potential indirect impacts to Transportation.

H-P3	H-S1	H-IM38	H-IM55
H-P12	H-S14	H-IM39	H-IM56
H-P35	H-IM2	H-IM40	H-IM57
H-P39	H-IM14	H-IM41	H-IM58

H-P40	H-IM22	H-IM44	H-IM61
H-P44	H-IM37	H-IM50	H-IM66

Impact Analysis. The above measures could indirectly impact transportation by stimulating development of new housing. The proposed number of housing units in the Project does not exceed that evaluated in the EIR, so that it would not result in additional vehicular trips beyond what was planned for and considered in the PEIR. Measures H-IM38, H-IM40, H-IM50, and H-IM58 are intended to develop housing closer to where people work, so that they would not need to commute from larger urban areas. In light of the PEIR, the Project would not introduce new transportation effects not previously examined, or that are substantially more severe than those previously considered.

3.3.17 Tribal Cultural Resources

Section 3.14 of the EIR evaluates environmental effects related to Tribal Cultural Resources. Because of the widespread distribution of culturally sensitive Tribal sites and regions in the County, the potential for significant impacts on those resources exists in community centers, rural centers, rural lands, agricultural lands and public lands. Policies, standards and implementation measures in the General Plan Update protect tribal cultural resources, and would reduce the anticipated impacts of development, but not to a less than significant level.

Policies. Consultation with Native American Tribes is required during discretionary project review, in order to identify resources not expressly listed. Consultation is also required during ministerial projects if the project may result in adverse changes to a significant Tribal resource. The County currently checks the state and local listed historic resources with reference to tribal resources (including those determined to be eligible for listing) prior to issuing building permits. Tribal resources must be identified during ministerial and discretionary project review and if found to be significant, protected from substantial adverse change. To avoid loss or degradation, projects located in areas known or suspected to be Native American burial sites are conditioned to avoid potential impacts. Substantial alterations to Tribal resources are prohibited through a permit approval without a determination that the resource is not significant or where overriding public benefits and mitigations would occur. Mitigation is required when development would adversely impact such resources, and is evaluated on a project-by-project basis.

Mitigation. Applied on a project-by-project basis.

Relevant Project Components. The following Project components could have potential indirect impacts to Tribal Cultural Resources.

H-P3	H-IM14	H-IM41	H-IM58
H-P39	H-IM22	H-IM44	H-IM61
H-P40	H-IM37	H-IM50	H-IM66
H-S1	H-IM38	H-IM55	
H-S14	H-IM39	H-IM56	
H-IM2	H-IM40	H-IM57	

Impact Analysis. The Project measures above would not directly impact Tribal resources, but indirect impacts could result from the development facilitated by the them. The proposed Project would not expand the overall developable area as identified in the EIR, or exceed the number of units previously evaluated. Impacts to Tribal resources are associated with specific development, and mitigation would be applied on a project level. The policies in the General Plan described above would be imposed upon any development projects in the affected areas. In light of the

PEIR, the potential impacts of the Project relating to Tribal Cultural Resources are not different from, and are not significantly more severe than those previously considered.

3.3.18 Utilities and Service Systems

Section 3.3 of the EIR evaluates environmental effects related to Utilities and Service Systems. Impacts of development under the General Plan Update regarding wastewater treatment capacity, stormwater, and solid waste were found to be less than significant. However, growth during the planning period could result in insufficient water supplies, which could cause significant environmental effects. In certifying the EIR and previous Housing Elements, the Board of Supervisors made findings that the benefits of implementing the Housing Element outweighed the unavoidable environmental effects.

Mitigation. A Water Supply Evaluation and Monitoring policy would evaluate watersheds to determine the long-term surface and groundwater supply to determine an estimate of the quantity of water available for future development. The policy prescribes ongoing monitoring of watershed conditions. Policies in the Plan would limit development potential, and disapprove projects that would exceed the available water supply and capacity of water systems. However, potential impacts could still result from the approval of ministerial development, and impacts to water supply and availability and the effectiveness of the mitigation cannot be definitively determined or tested at this time. Therefore, impacts related to water supply were considered significant and unavoidable. In certifying EIR, the Board of Supervisors made findings based on substantial evidence that the benefits of development outweighed the unavoidable environmental effects, and adopted a Statement of Overriding Conditions.

Relevant Project Components. The following Project components could have potential indirect impacts to Utilities and Service Systems.

H-P12	H-IM14	H-IM40	H-IM55
H-P39	H-IM22	H-IM41	H-IM56
H-P40	H-IM37	H-IM42	H-IM57
H-S1	H-IM38	H-IM44	H-IM58
H-S14	H-IM39	H-IM50	H-IM61
			H-IM66

Impact Analysis. The above policies, standards, and implementation measures indirectly encourage housing development, which could potentially impact water supplies. The extent of development under the Project would not exceed that evaluated in the EIR. Therefore, in light of the EIR, the Project's impacts to utilities and service systems would not be more severe than those previously considered.

3.3.19 Wildfire

Section 3.7.4.4 of the EIR evaluates environmental effects related to Wildfire. Most of Humboldt County is located within high or very high fire hazard severity areas, and a number of new dwelling units were projected to be developed within high and very high wildfire hazard areas during the planning period. General Plan Update policies intended to reduce wildland fire risk include: hazard fuel reduction (prescribed burning); Fire Safe Education; and Fire Service Provider Support, which makes information from the County available to fire service providers. The General Plan Update contains policies and programs that are intended to lessen wildfire risk where residential uses are planned adjacent to forest land.

Mitigation. Mitigation Measures that lessen impacts resulting from the exposure of people or structures to a significant risk wildland fires include: requiring forested buffers and building setbacks; requiring fire breaks in consultation with CALFIRE; requiring compliance with fire safe standards; and ongoing fire protection management programs. Although these policies and mitigation measures lessen potential risks of exposure to wildfire posed by residential development, those risks could not be reduced to a less than significant level. Therefore, impacts related to wildland fire were considered significant and unavoidable. In certifying EIR, the Board of Supervisors made findings based on substantial evidence that the benefits of implementing the General Plan Update outweighed the unavoidable environmental effects, and adopted a Statement of Overriding Conditions.

Relevant Project Components. The following Project components could have potential indirect impacts related to wildfire.

H-P39	H-IM41	H-IM57
H-S1	H-IM42	H-IM58
H-IM38	H-IM44	H-IM66
H-IM39	H-IM50	
H-IM40	H-IM56	

Impact Analysis. The above measures indirectly stimulate development of new housing, some of which may be in areas of high fire hazard. Any new development in such areas is subject to policies, implementation measures, and mitigation designed to lessen wildfire risk. The number of units proposed to be built falls within the bounds of projected development considered in the PEIR. In light of the PEIR, the Project would not result in new or substantially more severe environmental impacts concerning wildfire than those anticipated in the EIR.

3.3.20 Mandatory Findings

The 2019 Housing Element Update (Project) would not change the conclusions reached by the certified 2017 EIR regarding the environmental effects addressed in the Mandatory Findings of Significance Section of the PEIR.

The Project, like the General Plan Update it modifies, is a policy document that is intended to guide new development through the year 2028 (or 2040 in the case of the General Plan Update). Likewise, the Project would not substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory.

Approval of the Project would not increase the number of residential units in the County beyond what has already been analyzed in the EIR. The environmental setting conditions for the Project are essentially the same as those previously reviewed by the EIR.

The contribution of the Project to cumulative impacts has already been reviewed in the EIR. Approval of the Project would not, for the reasons noted above, have a substantial adverse impact on human beings either directly or indirectly in excess of those already identified in the EIR.

Project Environmental Impact Conclusions. The proposed CEQA Project would have no significant impact on any of the topical issues reviewed above. Although the EIR identified significant unmitigated impacts associated with a particular area of assessment, the proposed Project would not result in an increase in the severity of any of those potential impacts. Accordingly, for purposes

of this Addendum, the proposed Project would only result in less than significant changes in the level of impact identified or the mitigation measures proposed by the EIR.

4.0 STATEMENT OF FINDINGS

An addendum to a previous EIR is appropriate when all of the required findings described below can be made.

1. No substantial changes are proposed in the project which will require revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects [§15162(a)(1)].

Adoption of the draft 2019 Housing Element will not require revisions to the EIR because no new significant environmental effects or substantial increase in the severity of previously identified significant effects will occur. The adoption of the updated Housing Element involves updates to data, analysis and programs that do not involve new development or physical changes to the environment that would increase previously identified cumulative impacts. Statements of overriding considerations were made in conjunction with the EIR, in the areas of: Aesthetics, Agricultural Resources, Air Quality, Cultural Resources, Energy, Geology/Soils, Greenhouse Gas Emissions, Hydrology/Water Quality, Transportation, Utilities and Service Systems, Wildfire, and Mandatory Findings of Significance (Cumulative Impacts). The 2019 Housing Element will not cause a substantial increase in the severity of the identified countywide cumulative impacts. No physical changes to the environment will occur with adoption of this update to the Housing Element, beyond those that were previously considered. Therefore, updates to the Housing Element will not have new significant environmental effects or substantially increase the severity of previously identified significant effects.

2. No substantial changes occur with respect to the circumstances under which the project is undertaken which will require revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects [§15162(a)(2)].

Adoption of the 2019 Housing Element update will not require major revisions to the EIR because no substantial changes have occurred with respect to the circumstances under which the project was undertaken. The adoption of the 2019 Housing Element involves updates to data, analysis and programs and does not include new development or direct physical changes to the environment. New data and analysis in the 2019 Element indicates a continuation of physical, economic, and demographic conditions prevalent when the General Plan Update and previous Housing Element were undertaken. Substantial changes in the circumstances under which the project was undertaken have not occurred since EIR was adopted. As discussed under number "1" previously, no substantial increases in the severity of the cumulative impacts will occur. No direct physical changes to the environment, or indirect significant effects will occur with adoption of the 2019 Housing Element. Therefore, updates to the Housing Element will not have new significant environmental effects or substantially increase the severity of previously identified significant effects due to changes in circumstances.

3. 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 Board of Supervisors certified the previous EIR, shows any of the following:

a. The project will not have one or more significant effects not discussed in the previous EIR [§15162(a)(3)(A)];

No new information of substantial importance has been introduced that would lead to new or different impacts compared with those discussed in the EIR. Project components continue to build on, clarify, and modify policies, standards and implementation measures in the previous Housing Element. The types of development and resulting impacts would be the same as those evaluated in the EIR. Therefore, there is no evidence that the Housing Element update will result in one or more significant new effects not discussed in the EIR.

b. Significant effects previously examined will not be substantially more severe than shown in the previous EIR [§15162(a)(3)(B)];

No new information of substantial importance has been introduced that would increase the severity of the identified cumulative impacts or cause new significant effects not discussed in the EIR. The adoption of the 2019 Housing Element involves updates to data that indicate a continued stable, slow population growth rate, followed by decline. Housing construction activity continues to be around half that projected in the previous Element. There is no evidence that these conditions are likely to substantially change in the Project planning period. Based on projected development, adopting the Housing Element update will not have significant effects substantially more severe than shown in the previous EIR.

c. No 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 [§15162(a)(3)(C)];

No new information of substantial importance has been introduced that would make mitigation measures or alternatives previously found not to be feasible that were discussed in the EIR to now be feasible. Statements of overriding consideration were adopted for the previously identified significant and cumulative impacts. Additional mitigation measures and alternatives that were previously considered would not reduce the identified impacts for the same reasons stated in the EIR. Therefore, no mitigation measures or alternatives previously found not to be feasible would in fact be feasible that would substantially reduce one or more significant effects of the project.

d. No 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 [§15162(a)(3)(D)].

No new information of substantial importance has been introduced that would require mitigation measures or alternatives which are considerably different from those that were discussed in the EIR and/or that would substantially reduce one or more significant effects on the environment. Statements of overriding consideration were adopted for the previously identified impacts. No new or previously rejected mitigation measures or alternatives would reduce potential impacts.

5.0 Conclusion Regarding Preparation of an Addendum

The proposed 2019 Housing Element would not change any previous conclusions associated with effects disclosed in the EIR. Impacts previously found to be less than significant would not be elevated to significant as a result of the proposed Housing Element. No new significant impacts or more severe impacts resulting from the proposed modifications were identified, and no changes would occur in the EIR analysis of significant impacts. Therefore, based on the information above,

none of the conditions described in Section 15162 of the CEQA Guidelines have occurred and there is no substantial evidence to warrant the preparation of a subsequent EIR. The decision-making body shall consider this addendum to the final certified 2017 General Plan Program EIR prior to making a decision on the project.