

February 2020 | Negative Declaration Addendum

ADDENDUM TO 2016 HOUSING ELEMENT NEGATIVE DECLARATION

Trinity County

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1. Addendum to an Adopted Negative Declaration

1.1 BACKGROUND

Under the requirements of state law, every city and county in California must prepare a Housing Element as part of its General Plan. The Housing Element must document in detail existing conditions and projected needs in accordance with state housing law provisions. The element must also contain goals, policies, programs, and quantified objectives that address housing needs over the next five-year period.

On August 18, 2016, the County adopted the Negative Declaration (ND) (SCH#2016032045) for the existing Housing Element. As a policy document, the Housing Element does not result in physical changes to the environment but encourages the provision of affordable housing within the land use designations shown in the Land Use Element of the General Plan. None of the policies in the proposed project would result in physical changes to the environment. Construction that could result in physical changes to the environment within the County is required to comply with the General Plan, zoning ordinance, state and federal permits, and local development standards. In addition, any discretionary actions require independent and project-specific environmental review.

The proposed 2019-2024 Housing Element will serve as the County's guiding policy document that meets future needs of housing for all the County's economic levels. The proposed 2019-2024 Housing Element replaces the existing 2014 Housing Element.

1.2 SUMMARY OF NEGATIVE DECLARATION

The 2016 Negative Declaration was adopted by Board of Supervisors on August 18, 2016. The 2016 Negative Declaration did not identify any significant impacts or establish mitigation. The public comment period for the ND started on March 16, 2016 and ended on April 14, 2016.

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1.3 PROJECT SUMMARY

Government Code, Section 65588(a)(2) “Review and Revision” requires that a newly proposed 2019-2024 Housing Element review the goals and policies of the previous Housing Element, and report on the attainment and disposition of the goals and policies. CEQA requires the County to evaluate the environmental impacts associated with change to the environment. In this instance, most of the goals and policies from the previous Housing Element are continued through to the proposed 2019-2024 Housing Element. Table 1-1 includes the changes in goal or policy between the existing Housing Element and the proposed 2019-2024 Housing Element.

Table 1-1 Summary of Policy Changes Between Existing Housing Element and 2019-2024 Housing Element

Implementation Measures	Progress	Continue/Modify/Delete
<p>Program 1.1: The Planning Department will periodically review its permit procedures to increase efficiency by reducing the cost and time of processing permits but still remain effective and meet legal review requirements. This review will be conducted as part of the County’s ongoing permit streamlining program.</p>	<p>The County annually reviews permit procedures. No changes were made during this planning period.</p>	<p>Continue and modify to address SB 35.</p>
<p>Program 1.2: The Building and Development Services Department will not impose any requirement for construction other than those mandated by State law or those necessary to maintain the health and safety of citizens.</p>	<p>The Building and Development Services Department continues to permit developments consistent with State law and does not impose any additional requirements.</p>	<p>Delete. This is completed as part of the project review process.</p>
<p>Program 1.3: The County will provide information to developers of the funds available from State and federal programs to provide low to moderate-income housing. Information brochures shall be printed and made available at County offices, libraries, and other public agencies, and shall be posted on the County’s website.</p>	<p>This program was not implemented due to limited staff resources.</p>	<p>Combine with Program 2.1.</p>
<p>Program 2.1: The County will at least bi-annually encourage, support, and assist agencies and developers to apply for funds from available State and federal programs to provide low- to moderate-income housing. The County will provide support services such as:</p> <ul style="list-style-type: none"> • Helping identify sites where low- and moderate-income housing will not conflict with existing zoning regulations; • Applying for State and federal funds on behalf of housing providers when funding sources require public agency 	<p>The County actively collaborates with housing developers to support in their application for funding for programs to provide low- to moderate-income housing.</p> <p>The County is supporting the efforts of the Rural Communities Housing Development Corporation to bring a new, 30-unit affordable housing complex to Weaverville. The project will be developed and funded through support from the No Place Like Home (NPLH) and Low-Income Housing Tax Credits (LIHTC) programs.</p>	<p>Modify. Combine with Program 1.3.</p>

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<p>involvement. Funds should include costs for building permit fees and inspections;</p> <ul style="list-style-type: none"> • Supporting funding applications by housing providers; • Offering regulatory incentives, such as density bonuses, for projects that include housing units affordable to very low- and/or low-income households, provided that enforceable commitments are secured to ensure that units continue as affordable housing for target groups. 		
<p>Program 2.2: Trinity County will amend its Zoning Ordinance Section 30.3(F) that addresses the granting of density bonuses and concessions or incentives to development pursuant to Government Code Section 65915 to include more detail from the Government Code to provide clear direction to applicants about what is required to receive a density bonus or other incentives offered under these Government Code sections. The developers shall demonstrate that the project will meet minimum building codes and other County zoning and land use regulations.</p>	<p>The County adopted Ordinance No. 315-806 in January 2014. As part of that ordinance, Section 30.3(F) was added to the County Zoning Ordinance stating: “Density Bonus: An increase in permissible density may be provided per the provisions of Government Code Sections 65915 through 65918, as may be amended, should a developer agree to such requirements for provision of extremely low, very low, low, and/or moderate income housing consistent with other applicable development regulation and provided that enforceable commitments are secured to ensure that units continue as affordable housing for target groups.” This program has been addressed but not implemented to fully satisfy HCD requirements. This program will be modified to further amend the County Zoning Ordinance to include additional details about how an applicant can apply for a density bonus under State law.</p>	<p>Modify. Reword to be a broader program to offer concessions for affordable housing projects.</p>
<p>Program 2.3: The County will continue to allow manufactured housing (mobile homes) on parcels zoned for single-family residences, maintain mobile home park zoning, and will not adopt restrictions regarding their size or architectural features which would prevent manufactured housing (mobile homes) from being placed in these areas.</p>	<p>The County is in compliance with State law and continues to allow manufactured housing (mobile homes) on parcels zoned for single-family residences. The County also maintained mobile home park zoning, and has not adopted restrictions regarding the size or architectural features of manufactured housing (mobile homes) that would prevent them from being placed in areas zoned for single-family residences.</p>	<p>Delete. The County is in compliance with State law.</p>
<p>Program 2.4: In an effort to better document the number of dwellings developed for various income groups, the County shall prepare a proposal for providing information on the lot size, dwelling size, and number of bedrooms on the assessment rolls. A questionnaire could be provided at the time of escrow to aid in the gathering of this information.</p>	<p>The County has not had the resources to implement this program.</p>	<p>Delete. The County does not have the resources to continue this program.</p>
<p>Program 2.5: The County will continue to allow second units in conjunction with single-family residences. To increase awareness of this housing option among the public and property owners, the County will prepare an informational brochure promoting the</p>	<p>The County continues to allow Accessory Dwelling Units in conjunction with single-family residences in various zones in the County. The County has not prepared an informational brochure to promote second units, and therefore has not made any information available at public offices or gathering spaces.</p>	<p>Modify to reflect adoption of Ordinance No. 315-806 and Zoning Ordinance updates and continue.</p>

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<p>benefits, describing the zoning and town planning land use categories that permit second units, and explaining the process for obtaining permits for second units. The County will make this information available at County offices, libraries, and other public agencies and gathering facilities, as well as on the County website.</p>		
<p>Program 2.6: The County will establish a monitoring and early warning system for the 62 units at risk of conversion to market rate. The program will gauge owner interest in conversion, identify units likely to be acquired and managed, identify and assist entities in preserving at-risk units, respond to federal and State notice and provide educational resources to tenants.</p>	<p>A monitoring and early warning system for units at risk of conversion has not been established. The County will monitor the 62 units potentially at risk before August 31, 2024, throughout the planning period. If there is a need to implement this program during the current planning period, the County will do so.</p>	<p>Continue.</p>
<p>Program 2.7: The County shall meet with nonprofit developers and other stakeholders bi-annually to establish and implement a strategy to assist the development of housing affordable to extremely low-income households. As part of this effort, the County shall also consider prioritizing local financial resources and at least bi-annually seek and apply for State and federal funding specifically targeted for the development of housing affordable to extremely low-income households, such as CDBG, HOME and USDA funds. The County will provide concessions and incentives to assist the development of housing for extremely low-income households such as increased densities, modifications to development standards and priority processing. Also, per AB 2634, to further meet the needs of extremely low-income households, the County will also amend the Zoning Ordinance to define and allow single-room occupancy units without a Use Permit in the R-3 zone.</p>	<p>The County is supporting the efforts of the Rural Communities Housing Development Corporation to bring a new, 30-unit affordable housing complex to Weaverville. The project will be developed and funded through support from the No Place Like Home (NPLH) and Low-Income Housing Tax Credits (LIHTC) programs. The County prioritizes local financial resources and biannually seeks State and federal resources to fund the development of extremely low-income housing. The County has not taken action to amend the Zoning Ordinance to define and allow single-room occupancy units without a Use Permit in the R-3 zone.</p>	<p>Continue and modify timeline for Zoning Ordinance amendments.</p>
<p>Program 2.8: Trinity County will review and if necessary, amend its Zoning Ordinance to determine whether the 25-foot height limit in the R-3 zone is a constraint to multi-family development.</p>	<p>The County has not taken action to review the Zoning Ordinance to determine whether the 25-foot height limit in the R-3 zone is a constraint to multi-family development.</p>	<p>Combine with program 1.1.</p>
<p>Program 3.1: Whenever the County updates its Zoning Ordinance, General Plan, or community plans, it will consider the need to provide additional</p>	<p>The County did not update the Zoning Ordinance, General Plan, or community plans related to housing during the previous planning period. However, the level of development in the county is very low. Trinity County has sufficient lands for new residential development.</p>	<p>Combine with Program 3.2.</p>

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land for various types of residential development.		
Program 3.2: The Planning Department will conduct land use surveys in community planning areas as community plans are prepared or updated to identify vacant land that is residentially zoned or has residential potential. The Planning Department will use this information to identify lands that could support higher residential densities. The County will work with the landowners to rezone an adequate supply of these lands to higher density residential uses.	The Planning Department has not conducted land use surveys to identify vacant land as community plans are prepared or updated.	Combine with Program 3.1
Program 3.3: In an effort of any local community to improve its environmental health and housing expansion possibilities by providing some form of community water and/or sewage treatment facilities, the County will provide assistance and encouragement in the form of supporting resolutions and providing assistance in obtaining grants.	The County supported the Lewiston Community Service District through the process of connecting two water systems, reconstructing the sewer system, and adding new system users since adoption of the previous Housing Element.	Continue.
Program 3.4: The County will continue its policy of allowing residential development in residential and resource zoning classifications, other than the Timberland Production Zone (TPZ).	The County's Zoning Ordinance continues to allow residential development in residential and resources zoning classifications, other than the TPZ.	Delete. This information is included in the Zoning Ordinance.
Program 4.1: Trinity County will continue to utilize the housing condition report contained within the "Trinity County Housing Needs Report, Trinity County, California, " prepared by Trinity County Grants Department as baseline data to monitor the rehabilitation and repair of housing units in Trinity County. In addition, the County will apply for grant funding to conduct a new housing conditions survey during the current planning period, by 2018.	The County did not apply for grant funding to conduct a new housing conditions survey by 2018.	Combine with Program 4.2
Program 4.2: The County will apply for State and federal assistance for housing rehabilitation to finance the rehabilitation of substandard homes in the County and support the efforts of other agencies in pursuit of this same effort. If funded, the County will continue its existing housing rehabilitation program. In addition, the County will also support the efforts of other agencies that offer home weatherization programs by providing	The County continues to refer interested households to weatherization programs. The County has not applied for funding to assist with rehabilitation of substandard homes.	Continue. Combine with Program 4.1.

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information to the public and referrals on the weatherization programs.		
Program 4.3: The County will continue to encourage voluntary code compliance by providing guidance and technical assistance to residents who wish to make their own repairs. Local educational and home repair clinics will be supported in their efforts. Fliers for clinics and seminars will be made available to the public.	The County continues to provide fliers as programs are available.	Continue
Program 4.4: The County will continue to enforce the California Building Code, Fire Safe Codes, and the Health and Safety Regulations.	The County continues to enforce the California Building Code, Fire Safe Codes, and Health and Safety Regulations.	Delete. This is done in compliance with State law.
Program 5.1: Trinity County will encourage the inclusion of units designed to accommodate wheelchair bound, blind, and other physically restricted persons in new or rehabilitated multiple family projects of more than four units which are funded through Community Development Block Grants or other federal/State sources.	No new or rehabilitated multiple-family projects of 4 or more units were approved using federal or State funding sources.	Continue. Combine with Program 5.4.
Program 5.2: Trinity County will support the development of new housing units specifically designed to meet the needs of the elderly by coordinating with senior advocate groups.	No units for the elderly have been approved or constructed since adoption of the previous Housing Element.	Continue. Combine with program 5.4.
Program 5.3: Trinity County will assist non-profit and other social service organizations to maintain funding and provide shelter for homeless persons and victims of domestic violence as needed.	The County has not received any applications or requests for assistance from any organizations for shelter for homeless persons or victims of domestic violence but will continue their support if needed during the current planning period.	Continue.
Program 5.4: The County will work with housing providers to ensure that special housing needs are addressed for seniors, large families, female-headed households, single-parent households with children, farmworkers, persons with disabilities and developmental disabilities, and homeless individuals and families. The County will seek to meet these special housing needs through a combination of regulatory incentives, zoning standards, new housing construction programs, and supportive services programs. Incentives and programs the County offers include density bonuses, parking reductions for senior and group care homes, and a reasonable	The County is actively collaborating with housing developers to support in their application for funding for programs to provide low to moderate income housing. For example, the County is supporting the efforts of the Rural Communities Housing Development Corporation to bring a new, 30-unit affordable housing complex to Weaverville. The project will be developed and funded through support from the No Place Like Home (NPLH) and Low-Income Housing Tax Credits (LIHTC) programs. Of the 30 units, approximately half will be reserved for homeless or at risk of homeless persons with mental illness in the extremely low-income category. These residents will have their rent subsidized. Case managers will be on site and referrals and transportation to supportive services will be available as needed. The remaining units will be available to lower income households. While the income levels have not yet been determined for those units, it is anticipated that Section 8 Housing income guidelines will be employed, constituting very low-income and low-income units.	Continue. Combine with Programs 5.1 and 5.2.

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<p>accommodation procedure. The County will also continue to work with lower-income housing providers and funders to construct or acquire a variety of types of lower-income housing opportunities for individuals and groups with special needs and extremely low-income households if any applicants come forward. Specific housing types include:</p> <ul style="list-style-type: none"> • Smaller units, including single-room occupancy units (see Program 2.7). • Senior housing, including assisted living facilities (see Program 5.2). • Units with special adaptations for people with disabilities, per California Title 24 standards (see Program 5.1). <p>In addition, if staffing resources allow, the County may seek funding under CDBG, HOME Investment Partnerships, federal HOPWA, California Child Care Facilities Finance Program, and other State and federal programs designated specifically for special needs groups such as seniors, persons with disabilities, and persons at risk for homelessness.</p>		
<p>Program 5.5: To comply with the State Employee Housing Act (Health and Safety Code Sections 17021.5 and 17021.6), the County will review the Zoning Ordinance and amend it as necessary. Section 17021.5 requires the Zoning Ordinance to treat employee/farm worker housing that serves six or fewer persons as a single-family structure and permitted in the same manner as other single-family structures of the same type in the same zone in all zones allowing single-family residential uses. Section 17021.6 requires that employee/farm worker housing consisting of no more than 12 units or 36 beds be treated as an agricultural use and permitted in the same manner as other agricultural uses in the same zone.</p>	<p>The County has not yet amended the Zoning Ordinance to comply with State law.</p>	<p>Continue and modify timeline for Zoning Ordinance amendments.</p>
<p>Program 6.1: Continue to support and encourage the maintenance and development of emergency, transitional and supportive housing for the citizens of the county, and provide assistance and encouragement in obtaining grants.</p>	<p>The County supports the development of emergency housing through the Behavioral Health Services Cedar Home Respite project. In addition, the County provides Emergency Shelter Grant (ESG) Programs in coordination with the Community Action Partnership of Colusa, Glenn, and Trinity Counties including rental assistance.</p>	<p>Continue.</p>

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<p>Program 6.2: The County will amend the definition of Alternative Housing in the Zoning Ordinance to comply with Senate Bill 2 requirements for transitional and supportive housing to allow those uses in all zones that allow residential uses in the same way other residential uses are allowed and not subject to any restrictions (e.g., occupancy limits) not applied to similar dwellings in the zone.</p>	<p>The County has not amended the definition of Alternative Housing in the Zoning Ordinance to comply with Senate Bill 2 requirements for transitional and supportive housing.</p>	<p>Continue and modify to address AB 101 and AB 2162.</p>
<p>Program 7.1: Trinity County will direct persons with complaints of housing discrimination to the appropriate State and federal agencies that handle such complaints. Information regarding housing discrimination will be made available at Trinity County libraries, the senior centers, Human Response Network, Planning Department and Health and Human Services. The County will only support housing programs that are in compliance with the state Rumford Fair Housing Act and the Unruh Civil Rights Act, which prohibit arbitrary discrimination in housing.</p>	<p>When requested, the County directs persons with housing discrimination complaints to the appropriate State and federal agencies that handle such complaints. The County makes information regarding housing discrimination available at Trinity County libraries, senior centers, Human Response Network, Planning Department, and Health and Human Services. The County supports housing programs that are in compliance with the state Rumford Fair Housing Act and the Unruh Civil Rights Act.</p>	<p>Continue.</p>
<p>Program 8.1: The County will continue to review subdivision proposals and other land development projects to minimize flood damage to structures and utilities; prevent creation of new parcels which have no building sites outside the 100-year floodplain; require adequate grading and drainage for homesite development; and avoid areas with unstable soils, and high groundwater affecting drainage or sewage disposal.</p>	<p>The County continues to review subdivision proposals and other land development projects to implement this program.</p>	<p>Delete. This is done as part of the development review process.</p>
<p>Program 8.2: Each application for a residential building permit will be required to comply with Trinity County's Fire Safe Ordinance to reduce fire hazard risks. Homeowners, contractors, and developers will be encouraged to follow additional recommendations on fire safety from the California Department of Forestry and Fire Protection (Cal Fire), the Trinity County Fire Safe Council, and their local fire department.</p>	<p>The County continues to require a residential building permit to comply with Trinity County's Fire Safe Ordinance. In addition, the County encourages homeowners, contractors, and developers to follow additional fire safety recommendations.</p>	<p>Continue.</p>
<p>Program 9.1: The County will review the policies of their General Plan to ensure consistency.</p>	<p>The County has continued to review the policies in different General Plan elements for internal consistency. The County intends to update its General Plan by 2023. Updates may be made on an incremental basis with updates to some elements starting as early as 2021.</p>	<p>Modify and continue.</p>

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<p>Program 10.1: Each time a housing project is proposed, which may have an effect on a particular group or neighborhood, efforts will be made to distribute information on the project to ensure that the group or neighborhood is made aware of the project and the process and has the opportunity to respond.</p>	<p>There has not been a need to implement this program. There has been very limited new development outside of single-family development and a very small number of minor land divisions processed in recent years.</p>	<p>Continue.</p>
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As shown in Table 1-1, the proposed 2019-2024 Housing Element consolidates many goals and policies from the previous Housing Element to aid in implementation and to eliminate redundancy. The following four policies are new to the County and are included in the proposed 2019-2024 Housing Element:

- **Program 6.3** – Per AB 101 (2019), The County will review the Zoning Ordinance and make revisions if necessary, to allow low barrier navigation centers for the homeless per Government Code 65660-65668. The County will consider the potential to accommodate low barrier navigation centers for the homeless by examining existing government constraints and barriers.
- **Program 6.4** – The County will work with the Far Northern Regional Center to implement an outreach program that informs families in the county about housing and services available for persons with developmental disabilities. The program could include developing an informational brochure and directing people to service information on the County’s website.
- **Program 7.2** – The County will continue implementing its plan to Affirmatively Further Fair Housing. The AFFH Plan commits to take actions to address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics protected by the California Fair Employment and Housing Act (Part 2.8 (commencing with Section 12900) of Division 3 of Title 2), Section 65008, and any other state and federal fair housing and planning law.
- **Program 8.2** – The County will incorporate Title 24 and Leadership in Energy and Environmental Design (LEED) requirements into the Zoning Ordinance, specific plans, and development agreements as appropriate, and enforce State requirements, including Title 24 of the California Code of Regulations, for energy conservation in new residential projects. The County will encourage residential developers to employ additional energy conservation measures for the siting of buildings, landscaping, and solar access through development standards contained in the Zoning Ordinance, Building Code, and other plans as appropriate.

A copy of this Addendum, and all supporting documentation, may be reviewed or obtained at the Trinity County Planning Department, 61 Airport Road, Weaverville, CA 96093.

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2. CEQA Analysis

Under CEQA Guideline Section 15164, an addendum to a negative declaration may be prepared if only minor technical changes are required or if none of the conditions identified in Guideline Section 15162 are present. In the absence of substantial evidence to support a fair argument that the project changes may result in significant environmental impacts not previously studied, an addendum to a negative declaration is appropriate. The following review proceeds with the requirements of CEQA Guidelines Section 15162 in mind. The following discussion concludes that the conditions set forth in Section 15162 are not present, and that an addendum is appropriate for the proposed 2019-2024 Housing Element.

Discussion

The discussion in this addendum confirms that the proposed changes to the Housing Element update have been evaluated for significant impacts pursuant to CEQA. The discussion is meaningfully different than a determination that a project is “exempt” from CEQA review, as the proposed 2019-2024 Housing Element update is not exempt. Rather, the determination here is that the potential impacts of the proposed 2019-2024 Housing Element were adequately evaluated in the previous ND and that the ND provides a sufficient and adequate analysis of the environmental impacts of the proposed 2019-2024 Housing Element.

The following identifies the standards set forth in Section 15162 as they relate to the project. The text that follows the provisions of the law relates to the proposed 2019-2024 Housing Element.

- 1. No substantial changes are proposed in the project which would require major revisions of the previous IS/ND due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.**

As shown in Table 1-1, the policy changes included in the proposed Housing Element are limited to complying with state law, or elimination of policies where the County has already completed the identified task. The proposed 2019-2024 Housing Element does not require the rezoning of land or result in the approval of any development project. Additionally, all development in the County must be consistent with the General Plan, and if a discretionary action, must complete a project-specific environmental analysis. The three new policies represent changes that enable the County to offer low barrier navigation centers for the homeless, improve accessibility to housing services available for persons with developmental disabilities, incorporate energy conservation in new residential projects, and encourage residential developers to employ additional energy conservation measures. These policies either apply to existing building(s) for which the environmental analysis has been completed or will apply to new buildings anywhere in the County. All new construction is required to comply with County standards, including the need for project-specific environmental analysis.

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The proposed Housing Element consolidates many goals and policies from the existing Housing Element to aid in implementation and to eliminate redundancy. The modifications to housing policy do not amend the adopted land development pattern for the County as shown in the Land Use Element of the General Plan. As the proposed 2019-2024 Housing Element would not affect the land use pattern of the County, change the density or intensity of any land use, or result in any physical change to the environment, there are no new environmental impacts, or an increase in the severity of any environmental impacts previously identified in the ND.

2. The project will have one or more significant effects not discussed in the previous EIR or negative declaration.

As shown in Table 1-1, the proposed Housing Element policies are similar to the existing policies evaluated in the ND. In many cases the policies are being amended to comply with existing state law, or to clarify the intent. The proposed 2019-2024 Housing Element includes three new policies. One of the policies would result in a study to determine how barriers to homeless shelters could be reduced. All future development would be subject to project-specific CEQA analysis, as well as the policies of the proposed Housing Element. As a development project must be consistent with the General Plan, zoning, and development standards of the County, and the proposed Housing Element would not affect land use patterns in the County or result in any physical changes to the environment, the resulting impacts would be identical to the previously adopted 2016 ND. There would be no new environmental impacts, or an increase in the severity of any previously identified environmental impacts.

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

There were no significant impacts identified in the previously adopted 2016 ND. As stated in the response to 2., above, there are no significant impacts associated with the proposed 2019-2024 Housing Element.

4. 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.

There are no mitigation measures included in the previously adopted 2016 ND, and while the ND did not evaluate alternatives, the County is required to adopt a Housing Element, and the Element must be reviewed and certified by the California Housing and Community Development Department. As such, there is no feasible alternative to adopting a Housing Element. As with the existing Housing Element evaluated in the ND,

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the proposed 2019-2024 Housing Element does not result in significant environmental impacts, therefore there are no mitigation measures.

5. **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.**

There are no mitigation measures or alternatives evaluated in the previously adopted 2016 ND. As stated in 4., above, there are no significant impacts resulting from adoption of the 2019-2024 Housing Element, therefore, there are no mitigation measures, or alternatives to the proposed project.

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The County has reviewed the proposed changes to the Housing Element and on the basis of the whole record before it, has determined that there is substantial evidence to support the determination that the original ND remains relevant in considering the environmental impacts of the proposed changes. Further, there is no substantial evidence to suggest that the environmental impacts of the project, as identified in the Addendum, may have a significant effect on the environment beyond what was evaluated in the adopted ND. Therefore, a subsequent Environmental Impact Report (EIR) or new Mitigated Negative Declaration (MND) is not required. This Addendum to an adopted ND has been prepared pursuant to Title 14, Sections 15162 and 15164 of the California Code of Regulations.

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