



## 2023-2031 Housing Element Update

### General Plan EIR Addendum Evaluation

*prepared by*

**City of Sebastopol**  
Planning Department  
7120 Bodega Avenue  
Sebastopol, California 95472  
Contact: Kari Svanstrom, Planning Director

*prepared with the assistance of*

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Oakland, California 94612

**December 2022**

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**RINCON CONSULTANTS, INC.**

Environmental Scientists | Planners | Engineers

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# Acronyms and Abbreviations

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AB	Assembly Bill
ADU	Accessory Dwelling Unit
AMI	Area Median Income
EIR	Environmental Impact Report
ABAG	The Association of Bay Area Governments
BAAQMD	Bay Area Air Quality Management District
CAPCOA	California Air Pollution Control Officers Association
CCAP	Community Climate Action Plan
CCR	California Code of Regulations
CEQA	California Environmental Quality Act
DOF	California Department of Finance
EIR	Environmental Impact Report
FHSZ	Fire Hazard Severity Zone
GHG	Greenhouse gas
HCD	California Department of Housing and Community Development
LOS	Level of Service
PG&E	Pacific Gas and Electric
RHNA	Regional Housing Needs Assessment
RPS	California's Renewable Portfolio Standard
SB	Senate Bill
SOI	Sphere of Influence
SR	State Route
VMT	Vehicle Miles Traveled

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# 1 Introduction and Project Summary

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## 1.1 Project Title

City of Sebastopol Housing Element Update 2023-2031

## 1.2 Lead Agency Name and Address

City of Sebastopol  
Planning Department  
7120 Bodega Avenue  
Sebastopol, California 95472

## 1.3 Contact Person and Phone Number

Kari Svanstrom, Planning Director  
[kvanstrom@cityofsebastopol.org](mailto:kvanstrom@cityofsebastopol.org)  
(707) 823-6167

## 1.4 Project Location

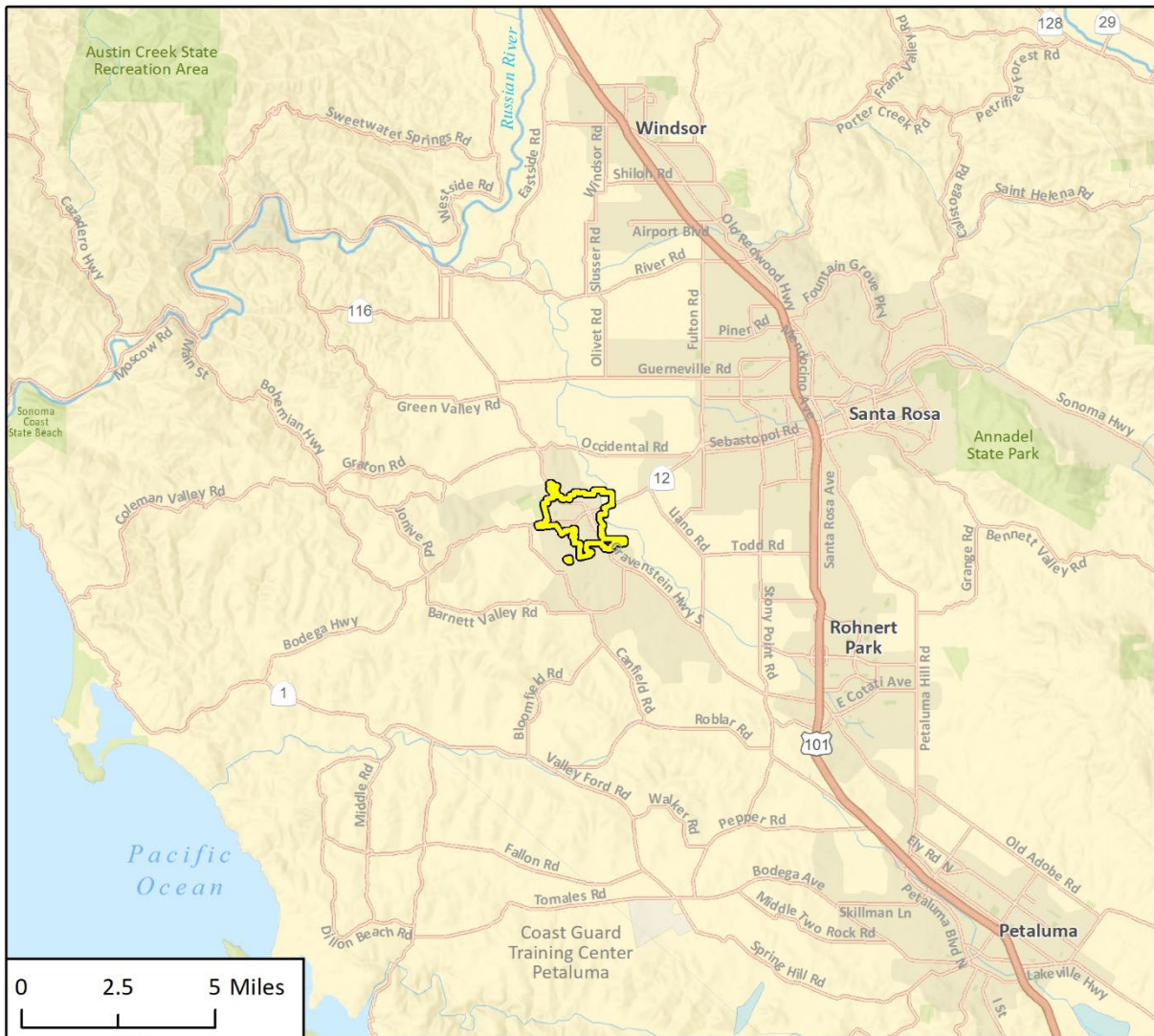
The City of Sebastopol (city) city limits and sphere of influence (SOI) encompass approximately 1,400 acres and are located in Western Sonoma County, approximately 15 miles east of the Pacific Ocean and 52 miles north of San Francisco. The City is south of the city of Graton, east of the city of Freestone, and southwest of the city of Santa Rosa. The city is largely built out and is at the crossroads of two State Highways, Highways 116 and 12. The city's SOI includes incorporated and unincorporated areas within which Sebastopol has the primary responsibility for the provision of public facilities and services. Lands within the SOI but outside existing city limits are under the jurisdiction of Sonoma County, and may be considered for development after annexation. The Housing Element Update's planning boundaries coincide with the Sebastopol city limits, both of which are depicted in Figure 1.

## 1.5 Project Sponsor's Name and Address



City of Sebastopol  
Planning Department  
7120 Bodega Avenue  
Sebastopol, California 95472



**Figure 1 Regional Project Location, Planning Boundaries**



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 City of Sebastopol 

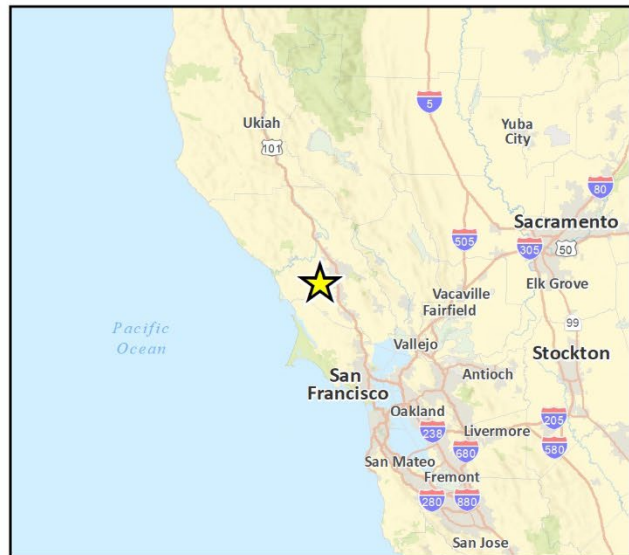


Fig 1 Regional Location

## 1.6 Project Description

The project consists of a comprehensive update to the City of Sebastopol Housing Element (herein referred to as “Housing Element Update” or “project”). The City’s 2016-2035 General Plan underwent extensive environmental review in the form of an Environmental Impact Report (EIR), which was certified on November 15, 2016 by the City Council (State Clearinghouse No. 2016032001). The EIR for the Sebastopol General Plan is a comprehensive document and includes discussion of alternatives and growth inducing impacts associated with urban development in the city at the time it was developed.

State law requires that housing elements be updated every eight years (California Government Code Sections 65580 to 65589.8). The Housing Element Update identifies residential sites adequate to accommodate a variety of housing types for all income levels and needs of special population groups, defined under State law (California Government Code Section 65583). It analyzes governmental constraints to housing maintenance, improvement, and development; addresses conservation and improvement of the condition of existing affordable housing stock; and outlines policies that promote housing opportunities for all persons. The City of Sebastopol Housing Element is being updated as part of the State’s 6th cycle Regional Housing Needs Assessment (RHNA) allocation. For Sebastopol, the planning period runs from January 31, 2023 through January 31, 2031.

The project would bring the City’s Housing Element into compliance with State legislation passed since the publication of the previous (5th Cycle) Housing Element (adopted in 2015). The Housing Element Update includes a housing sites inventory (Section 3 of the Housing Element) that demonstrates how the City plans to meet its 6th cycle RHNA allocation. However, no formal land use changes or physical development are proposed at the time of adoption of the Housing Element.

The Housing Element Update will not, in and of itself, result in environmental impacts as it does not propose to develop any projects. Rather, it establishes objectives and policies designed to guide future development as the City works to achieve State-mandated housing goals. Future development will require project-specific developmental review as potential impacts are location-specific and cannot be assessed in a meaningful way until a project site and development proposal are identified. When a specific development proposal is considered for approval, that project would be subject to adopted development guidelines/standards and it must comply with the 2016-2035 General Plan policies and actions listed in the certified 2016-2035 General Plan EIR in accordance with California Environmental Quality Act (CEQA) Guidelines Section 15168(c)(3). If a subsequent activity (in this case a specific development proposal) would have effects not identified in the EIR (the 2016-2035 General Plan EIR and this Addendum), the lead agency must prepare additional CEQA documentation prior to project approval.

This Addendum, therefore, analyzes the changes and potential impacts related to the adoption of Housing Element Update. No physical development or land use changes are addressed or evaluated. The City would analyze land use changes separately to demonstrate compliance with the requirements of CEQA, if necessary. This Addendum is intended to demonstrate consistency of the Housing Element Update with the existing General Plan EIR to comply with the requirements of CEQA. In particular, and in line with Public Resources Code Section 21083.3, this Addendum Evaluation assesses whether the updated Housing Element, as a policy and programs document, includes impacts not addressed or analyzed as significant effects in the General Plan EIR.

## 1.7 Discretionary Action

Implementation of the Housing Element would require the following discretionary actions by the City of Sebastopol Planning Commission/City Council:

- Approval of a General Plan Amendment to incorporate the 2023-2031 Housing Element Update

The California Department of Housing and Community Development (HCD) reviews and determines whether the proposed Housing Element complies with State law. Aside from HCD, no other approvals by outside public agencies are required.

## 1.8 Prior Environmental Document(s)

City of Sebastopol, General Plan Environmental Impact Report (General Plan EIR). State Clearinghouse Number 2016032001, certified May 2016.

## 1.9 Location of Prior Environmental Document(s)

City of Sebastopol, Planning Department website:

<https://ci.sebastopol.ca.us/City-Government/Departments-Services/Planning/General-Plan>

## 2 Project Context

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The California Legislature has identified the attainment of a decent home and suitable living environment for every resident as the State's major housing goal. Recognizing the important role of local planning programs in pursuing this goal, the legislature mandated that all cities and counties prepare a housing element as part of their comprehensive general plans. Government Code Sections 65580 to 65589.8 set forth the specific components to be contained in a community's housing element.

### 2.1 Purpose of the Housing Element

The Housing Element of the General Plan is designed to provide the City with a coordinated and comprehensive strategy for promoting the production of safe, decent, and affordable housing within the community. A priority of both State and local governments, Government Code Section 65580 states that "the availability of housing is of vital statewide importance, and the early attainment of decent housing and a suitable living environment for every Californian family is a priority of the highest order."

Pursuant to the State law, the Housing Element has two main purposes:

1. To provide an assessment of both current and future housing needs and constraints in meeting these needs
2. To provide a strategy that establishes housing goals, policies, and programs

The Housing Element is one of the eight General Plan elements the State mandates in Government Code Section 65302. The Housing Element serves as an integrated part of the General Plan but is updated more frequently to ensure its relevancy and accuracy. The Housing Element identifies strategies and programs that focus on:

1. Conserving and improving existing affordable housing
2. Maximizing housing opportunities throughout the community
3. Assisting in the provision of affordable housing
4. Removing governmental and other constraints to housing investment
5. Promoting fair and equal housing opportunities

The residential character of Sebastopol is largely determined by the variety, location, and maintenance of its housing. The Housing Element is an official response to the need to provide housing for all economic segments of the population, establishing goals, policies, and programs that will guide City decision making and set forth an action plan to implement these housing programs through an established planning period.

### 2.2 Updates to the Housing Element

State law requires that housing elements be updated every eight years (California Government Code Section 65588). The Housing Element must identify residential sites adequate to accommodate a variety of housing types for all income levels and to meet the needs of special population groups as

defined under State law (California Government Code Section 65583). The Housing Element analyzes market and governmental constraints to housing maintenance, improvement, and development; addresses conservation and improvement of the condition of existing affordable housing stock; and outlines policies that promote housing opportunities for all persons.

## 2.3 Regional Housing Needs Allocation

The RHNA reflects the California Department of Housing and Community Development’s determination of the projected housing needs in a region by household income level as a percent of the Area Median Income (AMI). The Association of Bay Area Governments (ABAG) was tasked with allocating this regional housing need among the jurisdictions in the ABAG region, which includes Sonoma County. Table 1 shows the breakdown of the RHNA for Sebastopol during the 2023-2031 planning period.

**Table 1 2023-2031 Regional Housing Need Allocation**

Income Group	Sebastopol Unit Needs	Percent of Total Units	Regional Unit Needs (Sonoma County)	Percent of Regional Units
Very low ( $\leq$ 50% AMI)	55	25.8%	114,442	25.9%
Low ( $>$ 50-80% AMI)	31	14.6%	65,892	14.9%
Moderate ( $>$ 80-120% AMI)	35	16.4%	72,712	16.5%
Above Moderate ( $>$ 120% AMI)	92	43.2%	188,130	42.6%
<b>Total</b>	<b>213</b>	<b>100%</b>	<b>441,176</b>	<b>100%</b>

AMI = Area Median Income (established annually by the Department of Housing and Urban Development)  
 Source: ABAG 2021

The City had 3,606 households as of January 2022 (California Department of Finance [DOF] 2022). As of 2022, 72.2 percent were single-family units, which included 62.5 percent single-family detached units and 9.7 percent single-family attached units; 25.8 percent were multi-family dwelling units; and the remaining two percent were mobile homes (DOF 2022).

## 2.4 Changes in State Law

The following items represent substantive changes to State housing law since the City’s last Housing Element was adopted and certified in 2015. The Housing Element Update has incorporated and addressed all pertinent housing law changes.

- Affordable Housing Streamlined Approval Process: Senate Bill 35 (2017)
- Additional Housing Element Sites Analysis Requirements: Assembly Bill 879 (2017) and Assembly Bill 1397 (2017)
- Affirmatively Furthering Fair Housing: Assembly Bill 686 (2017)
- No-Net-Loss Zoning: Senate Bill 166 (2017)
- Safety Element to Address Adaptation and Resiliency: Senate Bill 1035 (2018)
- By Right Transitional and Permanent Supportive Housing: Assembly Bill 2162 (2018) and Assembly Bill 101 (2019)

- Accessory Dwelling Units: Assembly Bill 2299 (2016), Senate Bill 1069 (2016), Assembly Bill 494 (2017), Senate Bill 229 (2017), Assembly Bill 68 (2019), Assembly Bill 881 (2019), Assembly 587 (2019), Senate Bill 13 (2019), and Assembly Bill 671 (2019)
- Density Bonus: Assembly Bill 1763 (2019)
- Housing Crisis Act of 2019: Senate Bill 330
- Surplus Land Act Amendments: Assembly Bill 1486 and AB 1255 (2019)
- Housing Impact Fee Data: Assembly Bill 1483 (2019)
- Emergency and Transitional Housing Act of 2019: Assembly Bill 139 (2019)
- Standardization of Sites Inventory Analysis and Reporting: Senate Bill 6 (2019)
- Evacuation Routes: Senate Bill 99 and AB 747 (2019)

## 2.5 City of Sebastopol General Plan

State law mandates that each city and county in California adopt "a comprehensive, long-term general plan," the purpose of which is to plan for important community issues such as new growth, housing needs, and environmental protection. Furthermore, the General Plan is used to project future demand for services such as sewer, water, roadways, parks, and emergency services.

The Sebastopol General Plan, adopted in November 2016, is a long-term document with text and diagrams that express the goals, objectives, and policies necessary to guide the community toward achieving its vision over a 19-year period (2016 to 2035). A General Plan reflects the priorities and values of the community.

City decision-makers (e.g., City Council and Planning Commission), rely on the General Plan as the basis for making decisions on matters such as land use, and the provision of public facilities (e.g., roads, parks, fire stations). It is also a policy document that guides decisions related to protecting, enhancing, and providing open space, habitat conservation, arts and recreation programming, and community character.

State law requires that every General Plan, at a minimum, address certain subject categories (called "elements"), which include land use, circulation, housing, conservation of natural resources, environmental justice, open space, noise, and safety. A General Plan may also address other subjects that are of importance to the community" future, such as sustainability, community design, and public art. Sebastopol's General Plan includes the following elements:

- Land Use
- Circulation
- Community Services and Facilities
- Conservation and Open Space
- Noise
- Community Design
- Safety
- Economic Vitality
- Community Health and Wellness
- Housing

## 2.6 Sebastopol General Plan Update EIR

The Sebastopol General Plan Update EIR (herein called the General Plan EIR) addressed the potential environmental effects of the planned buildout of the City of Sebastopol through the year 2035 and concluded that implementation of the 2016-2035 General Plan would result in levels of environmental impacts as detailed in Table 2. Proposed mitigation measures in the General Plan EIR were incorporated as policies in the General Plan to reduce potential impacts from future project development.

**Table 2 Summary of Areas of Potential Impact under the Sebastopol General Plan Update EIR**

Issue Area	Level of Significance After Mitigation	Mitigation Proposed in the General Plan EIR
Aesthetics and Visual Resources	Significant and Unavoidable	General Plan Policies and Actions
Agricultural Resources	Less than Significant	General Plan Policies and Actions
Air Quality	Less than Significant	General Plan Policies and Actions
Biological Resources	Less than Significant	General Plan Policies and Actions
Cultural Resources	Less than Significant	General Plan Policies and Actions
Energy <sup>1</sup>	Less than Significant	General Plan Policies and Actions
Greenhouse Gases and Climate Change	Less than Significant	General Plan Policies and Actions
Geology, Soils, and Mineral Resources	Less than Significant	General Plan Policies and Actions
Hazards and Hazardous Materials	Less than Significant	General Plan Policies and Actions
Hydrology and Water Quality	Significant and Unavoidable	General Plan Policies and Actions
Land Use, and Population	Less than Significant	None
Noise	Significant and Unavoidable	General Plan Policies and Actions
Population and Housing	Less than Significant	General Plan Policies and Actions
Public Services and Recreation	Less than Significant	General Plan Policies and Actions
Utilities	Significant and Unavoidable	General Plan Policies and Actions
Transportation	Significant and Unavoidable	General Plan Policies and Actions
Wildfire <sup>2</sup>	Less than Significant	General Plan Policies and Actions

<sup>1</sup> Energy was discussed under Section 3.7, *Greenhouse Gas Emissions*, of the Sebastopol General Plan Update EIR.

<sup>2</sup> Wildfire was discussed under Section 3.8, *Hazards*, of the Sebastopol General Plan Update EIR.

Source: City of Sebastopol 2016a

### City of Sebastopol General Plan Assumptions

The General Plan has a planning horizon year of 2035, but it does not specify or anticipate exactly when buildout would occur, as long-range demographic and economic trends are difficult to predict. The designation of a site in the General Plan for a certain use does not necessarily mean that the site will be developed or redeveloped with that use during the planning period, as most development depends on property owner initiative.

As detailed in General Plan EIR in Table 2.0-3, *Projected New Development – City Limits Buildout*, the General Plan would result in a potential buildout total of 750 new residential units, 341,159 square

feet of new commercial space, 59,959 square feet of new industrial space, and 137,375 square feet of new office space within City limits. During the 19-year time frame, this new growth would increase the City's population by approximately 1,658 residents<sup>1</sup>, and the full development of new commercial, office, and industrial uses would increase employment opportunities in Sebastopol by approximately 1,545 employees<sup>2</sup>. The jobs to housing ratio associated with new development in the City would be approximately 0.93, with full buildout of residential and employee-generating uses (City of Sebastopol 2016a).

## 2.7 Housing Element Update

The 2023-2031 Housing Element Update has the following major components:

- An **introduction** to review the overall Housing Element Update effort, a summary of housing needs and constraints, a Fair Housing summary, and a review of the effectiveness of the 2022 Housing Element and the City's progress in its implementation. (Section 1)
- A **Housing Strategy**, which is comprised of the Goals, Policies, and Programs that the City intends to implement over the next 8-year planning cycle. (Section 2)
- The City's **Quantified Objectives** of projected new construction of affordable and market rate units during the period 2023 – 2031 based on needs, resources, and constraints. (Section 2, Table 10)
- A detailed **Housing Sites Inventory**, including development capacity assumptions used and an analysis of recent development in the City, and a comparison of this inventory to the City's projected housing needs. (Section 3)
- A **Technical Background Report** which provides an assessment of housing needs & programs, an analysis of nongovernmental, governmental, and environmental constraints to affordable housing provision, a discussion of special needs populations, and an assessment of fair housing. This section also contains four appendices that include detailed information on public engagement and community input and. pre-certified housing and demographic data provided by ABAG (Section 4)

### Goals, Policies, and Programs

The primary objective of the Housing Element is to encourage the production of new housing units to meet the RHNA and housing for special needs populations. This is done by adopting a series of goals and policies that facilitate the development of all housing types, explore innovative housing solutions, address the needs of the City's residents, and affirmatively further fair housing. The 2023-2031 Housing Element Update goals, policies, and programs are summarized below and referenced throughout this Addendum Evaluation as appropriate.

#### *Housing Development*

State law requires that the goals and policies of the housing element shall encourage and facilitate the production of a range in types of housing affordable to households of varied income levels. The City supports this goal by providing assistance programs, adequate siting, and a variety of housing types to meet the needs of each income category.

<sup>1</sup> Based on the 2015 California DOF estimate of 2.21 persons per household in Sebastopol used in the General Plan.

<sup>2</sup> Assumes one employee generated for: every 350 square feet of commercial space, every 295 square feet of office space, and every 575 square feet of industrial space.



### *Government Constraints*

Government constraints such as application requirements, design and development standards, and the time and uncertainty associated with obtaining permits can affect the price and availability of housing. Input from stakeholders indicates that the City's approval processes could be streamlined to better facilitate development projects, and that continued learning opportunities are needed to decrease constraints and uncertainty related to implementation of new housing laws and programs.

The 2023-2031 Housing Element Update includes programs to help the City overcome these constraints. The strategies employed would help remove government constraints to accommodate special housing needs and expedite processing for affordable housing projects.

### *Conservation of Existing Housing*

Most of Sebastopol's housing units are more than 50 years old and rehabilitation needs will increase over the planning period. Negative effects of code enforcement can occur when compliance measures are not economically feasible for property owners. The 2023-2031 Housing Element Update contains policies and programs that aim to preserve existing housing while protecting the occupant's cultural, socio-economic, and/or accessibility needs.

### *Fair Housing*

Equal access to housing for all is fundamental to each person in meeting essential needs and pursuing personal, educational, employment, or other goals. As defined in state and federal law, fair housing is a condition in which individuals of similar income levels in the same housing market have like ranges of choice available to them regardless of protected status. Recognizing this fundamental right, the federal and State of California governments have both established fair housing as a right protected by law. The 2023-2031 Housing Element Update contains policies and programs that would ensure fair access to housing and services for all members of the community.

### 3 Overview of CEQA Guidelines Section 15164

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CEQA Guidelines Sections 15162 and 15164 set forth the criteria for determining the appropriate additional environmental documentation, if any, to be completed when a project has a previously certified EIR.

CEQA Guidelines Section 15164 states that a lead 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 sections 15162(a) states that no Subsequent or Supplemental EIR shall be prepared for a project with a certified EIR unless the lead agency determines, based on substantial evidence in the light of the whole record, one or more of the following:

1. Substantial changes are proposed in the project that will require major 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.
2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major 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.
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, shows any of the following:
  - A. The project will have one or more significant effects not discussed in the previous EIR.
  - 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.
  - D. Mitigation measures or alternatives that 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 analysis pursuant to Section 15162 demonstrates whether the lead agency can approve the activity as being within the scope of the existing certified EIR, that an addendum to the existing EIR would be appropriate, and no new environmental document, such as a new EIR, would be required. The addendum need not be circulated for public review but can be included in or attached to the final EIR, and the decision-making body shall consider the addendum with the final EIR prior to deciding on the project.

The City has prepared this Addendum Evaluation, pursuant to CEQA Guidelines Sections 15162 and 15164, to evaluate whether the project's environmental impacts are covered by and within the scope of the Sebastopol General Plan EIR (May 2016, State Clearinghouse Number 2016032001).

The following Addendum Evaluation details any changes in the project, changes in circumstances under which the project is undertaken, and/or "new information of substantial importance" that may cause one or more effects to environmental resources.

The responses herein substantiate and support the City's determination that the Housing Element Update policies and programs are within the scope of the Sebastopol General Plan EIR, do not require subsequent action under CEQA Guidelines Section 15162 and, in conjunction with the EIR, adequately analyze potential environmental impacts.

## 4 Environmental Effects and Determination

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### 4.1 Environmental Areas Determined to Have New or Substantially More Severe Significant Effects Compared to Those Identified in the Previous EIR

The subject areas checked below were determined to be new significant environmental effects or to be previously identified effects that have a substantial increase in severity either due to a change in project, change in circumstances, or new information of substantial importance, as indicated by the checklist and discussion on the following pages.

- None
- |  |   |   |
|--|---|---|
| <input type="checkbox"/> Aesthetics                    | <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Air Quality                        |
| <input type="checkbox"/> Biological Resources          | <input type="checkbox"/> Cultural Resources                 | <input type="checkbox"/> Energy                             |
| <input type="checkbox"/> Geology and Soils             | <input type="checkbox"/> Greenhouse Gas Emissions           | <input type="checkbox"/> Hazards and Hazardous Materials    |
| <input type="checkbox"/> Hydrology and Water Quality   | <input type="checkbox"/> Land Use and Planning              | <input type="checkbox"/> Mineral Resources                  |
| <input type="checkbox"/> Noise                         | <input type="checkbox"/> Population and Housing             | <input type="checkbox"/> Public Services                    |
| <input type="checkbox"/> Recreation                    | <input type="checkbox"/> Transportation                     | <input type="checkbox"/> Tribal Cultural Resources          |
| <input type="checkbox"/> Utilities and Service Systems | <input type="checkbox"/> Wildfire                           | <input type="checkbox"/> Mandatory Findings of Significance |

### 4.2 Determination

Based on this analysis:

- Substantial changes are proposed in the project or there are substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previous EIR due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects. Or, there is "new information of substantial importance," as that term is used in CEQA Guidelines Section 15162(a)(3). Therefore, a SUBSEQUENT or SUPPLEMENTAL EIR is required.

- No substantial changes are proposed in the project and there are no substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previous EIR due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects. Also, there is no "new information of substantial importance" as that term is used in CEQA Guidelines Section 15162(a)(3). Therefore, the previously certified EIR is adequate and this evaluation serves as an ADDENDUM to the City of Sebastopol, General Plan Technical Update Environmental Impact Report (General Plan EIR). State Clearinghouse Number 2016032001 certified May 2016.



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Signature

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Kari Svanstrom

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Printed Name

12/8/2022

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Date

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Planning Director

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Title

## 5 Addendum Evaluation Methodology

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### 5.1 General Plan Consistency

The Housing Element is a component of the City's General Plan and is periodically updated pursuant to state law. Therefore, the Housing Element Update is consistent with the vision of the General Plan and is supported by goals and policies of the other General Plan Elements. The General Plan Elements and policies that correspond with the goals and policies of the Housing Element are summarized below:

- The **Land Use Element** designates the general distribution and intensity of residential, commercial, industrial, open space, public/semi-public, and other categories of public and private land uses. The Land Use Element includes the Land Use Map, which identifies land use designations for each parcel in the city limits and SOI/UGB.
- The **Circulation Element** correlates closely with the Land Use Element and identifies the general locations and extent of existing and proposed major thoroughfares, transportation routes, and alternative transportation facilities necessary to support a multi-modal transportation system. This element is intended to facilitate mobility of people and goods throughout Sebastopol by a variety of transportation modes, with an emphasis on bicycle, pedestrian, and transit.
- The **Community Services and Facilities Element** includes goals, policies, and actions that address public services and facilities, including: parks, trails, and recreation facilities; police services; fire protection services; schools; and civic, library, medical, and other community facilities. This element is a critical component in meeting the infrastructure and public services needs of businesses and residents.
- The **Conservation and Open Space Element** addresses the conservation, development, and use of natural resources, riparian environments, native plant and animal species, soils, mineral deposits, cultural/historical resources, air quality, and alternative energy. It also details plans and measures for preserving open space for natural resources and the managed production of resources.
- The **Noise Element** establishes standards and policies to protect the community from the harmful and annoying effects of exposure to excessive noise levels. This element includes strategies to reduce land use conflicts that may result in exposure to unacceptable noise levels.
- The **Community Design Element** focuses on the ways in which Sebastopol's buildings, streets, and open spaces work together to define the City's sense of place. The purpose of this Element is to provide an overall policy framework for the continued design improvement and evolution of the City.
- The **Safety Element** establishes policies and programs to protect the community from risks associated with geologic, flood, and fire hazards, as well as setting standards for emergency preparedness.
- The **Economic Vitality Element** seeks to sustain and diversify the city's economy, recognizing the importance of supporting existing and local businesses while broadening and expanding the employment base and economic opportunities within the city. Long-term fiscal sustainability will be supported by economic growth from increasing the range of business, commercial services, and high-quality jobs in the city. Providing a broader economic base is intended to

improve the city’s economic vitality while increasing access for residents to local goods and services and local employment opportunities.

- The **Community Health and Wellness Element** addresses a wide range of community health topics, including access to healthy foods, substance abuse, access to medical care, and maintaining healthy lifestyles.

Adoption of the Housing Element Update will require the City to amend the General Plan’s Land Use Element, specifically the Land Use Plan, to implement the housing sites inventory associated with the City’s assigned RHNA allocation for planning period 2023-2031. This is required pursuant to California Government Code Section 65583(c)(1)(A).

### Accommodation of the RHNA

Sebastopol’s RHNA for the current (2023-2031) planning period is 213 units, consisting of 55 very low-income housing units, 31 low-income housing units, 35 moderate-income housing units, and 92 above moderate-income housing units. The City must demonstrate the availability of sites with appropriate zoning and development standards that can facilitate and encourage the development of such units. The Housing Element Update includes a housing plan that accommodates the RHNA plus a buffer of additional housing units as recommended by the HCD. The City has identified enough units through RHNA Credits (projected Accessory Dwelling Unit (ADU) development and pending, approved, or permitted projects) to meet the 6th Cycle RHNA for each category except for moderate-income. To identify enough sites for its moderate-income RHNA, and to provide an additional buffer of lower-income units to address No Net Loss requirements, the Housing Element includes an inventory of suitable sites for housing development. Table 3 shows the City’s RHNA and capacity of Housing Opportunity Sites.

**Table 3 Housing Unit Yield per Site Category**

	Very Low	Low	Moderate	Above Moderate	Total
<b>RHNA Allocation</b>	<b>55</b>	<b>31</b>	<b>35</b>	<b>92</b>	<b>213</b>
RHNA Credits	75	38	30	122	265
Remaining RHNA After Credits	-20	-7	5	-30	-52
Capacity of Sites Inventory	Vacant	0	9	38	47
	Nonvacant	0	18	16	52
	<b>Total</b>	<b>0</b>	<b>18</b>	<b>25</b>	<b>56</b>
Total Units (Credits + Sites)	75	56	55	178	364
<b>RHNA Surplus</b>	<b>20</b>	<b>25</b>	<b>20</b>	<b>86</b>	<b>151</b>
Percent Buffer	36%	81%	57%	93%	71%

Sources: City of Sebastopol 2022

The 213 units that would be accommodated by the Housing Element Update would not exceed the 750 units included in the City’s buildout capacity estimated under the General Plan and analyzed in the General Plan EIR. The Housing Element Update would be consistent with State requirements for the RHNA to plan adequately to meet existing and projected housing needs for all economic segments of the community. The Housing Element Update would also be submitted to HCD for

review and approval to ensure that it would adequately address the housing needs and demands of the City.

A detailed discussion of the Housing Element Update development assumptions and housing plan is provided below.

### *Housing Element Update Plan and Assumptions*

The City would meet its RHNA through ADU development projections; planned, approved, and pending projects projected to develop during the planning period; and adequate sites identified in the Sites Inventory, including sites on vacant and non-vacant land.

## **ADUS**

Jurisdictions may count the potential for ADU development as credits towards their RHNA. Legislation in California has recently facilitated the increased permitting and production of ADUs in many communities, including Sebastopol. From 2018 to 2021, the City permitted an annual average of 7.5 ADUs, which has helped address many of the City's identified housing needs, including special needs housing. The City used conservative affordability assumptions to ensure the distribution of affordability reflects local development trends. The distribution of affordability will be applied to the projection of 7.5 ADUs built annually, for a total of 60 units (15 units per income level) over the 8-year planning period credited towards Sebastopol's RHNA.

## **PLANNED, APPROVED, AND PENDING PROJECTS**

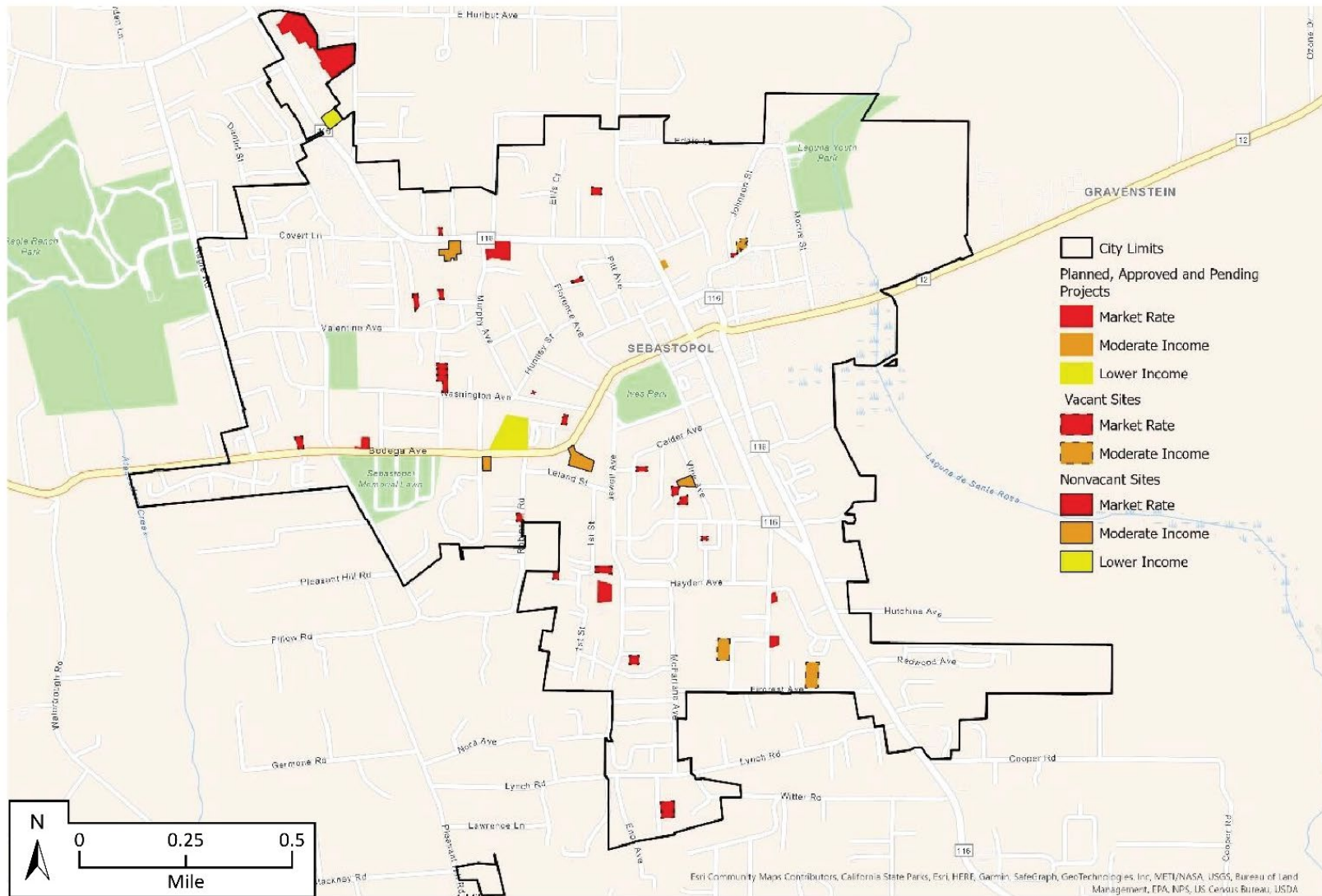
Jurisdictions may count planned, approved, and pending residential units as credits towards their RHNA. These units can be counted based on affordability and unit count, provided it can be demonstrated that the units can be built within the planning period. As illustrated in Figure 2, the City currently has 60 RHNA credits for extremely low- and very-low income planned projects, 23 RHNA credits for low-income planned projects, 15 RHNA credits for moderate-income planned and pending projects, and 107 RHNA credits for above moderate-income planned, approved, and pending projects.

## **VACANT AND NON-VACANT HOUSING OPPORTUNITY SITES**

As shown in Table 3, the City has identified enough units through RHNA Credits to meet its 6th Cycle RHNA for each category except for moderate-income. Therefore, the Housing Element Update has prepared an inventory of suitable vacant and non-vacant sites for housing development. As shown in Figure 2, the City has identified 26 vacant Housing Opportunity Sites at the above moderate-income level, three of which can also be used at the moderate-income level. The City has also identified five non-vacant Housing Opportunity Sites, four of which are for moderate-income and above moderate-income, and one of which is for low-income and moderate-income. A detailed description of each site along with their residential capacities can be found in Section 3.3, *Housing Opportunity Sites*, of the Housing Element Update.



Figure 2 Housing Opportunity Sites



Source: City of Sebastopol HCD Review Draft Housing Element, September 2022.

## 5.2 Preliminary Environmental Constraints

State housing law requires the City to review both governmental and non-governmental constraints to the maintenance and production of housing for all income levels. Since local governmental actions can restrict the development and increase the cost of housing, State law requires the Housing Element to “address and, where appropriate and legally possible, remove governmental constraints to the maintenance, improvement, and development of housing” (Government Code Section 65583(c)(3)).

Several factors can constrain residential development. These include market constraints, such as development costs and interest rates, and governmental constraints, which include land use controls, fees, processing times, and development standards, among others. In addition, environmental and infrastructure constraints can also impede residential development. For purposes of the Addendum Evaluation, only the potential environmental constraints, as they relate to CEQA, were evaluated.

Environmental constraints to residential development typically relate to the presence of sensitive habitat, flooding and floodplains, topography, and other natural and physical characteristics that can limit the amount of development in an area or increase the cost of development. The Housing Element Update, in and of itself, does not propose specific development projects, but rather puts forth goals, policies, and programs that support housing efforts in Sebastopol.

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## 6 Addendum Evaluation

### 1 Aesthetics

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	Where was the Impact Analyzed in the EIR?	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162(a) Occur?	Project is within the Scope of General Plan EIR?
				Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		

Would adoption of the Housing Element Update:

a. Have a substantial adverse effect on a scenic vista?	Significant and Unavoidable	<p>Policies: COS 1-2 through 1-4, COS 2-2, COS 2-4 through 2-6, COS 4-1 through 4-3, COS 6-1 through 6-5, COS 10-5, COS 10-6, COS 11-1 through 11-8, COS 12-3, COS 12-6, COS 12-9 through 12-13, COS 12-15 through 12-17, CD 1-1 through 1-3, CD 1-11 through 1-14, CD 2-1, CD 2-4, CD 2-6 through 2-8, LU 1-2, LU 1-3, LU 5-3, LU 5-4</p> <p>Actions: COS-1a and 1b, COS-2a, COS-4f, COS-6a through 6e, COS-10e and 10f, COS-11a through 11g, COS 12b through 12d, COS 12k through 12m, CD 1a through 1c, CD 1e and 1f, CD 1k, CD 2a, CD 2e, CD 2g, LU 5a</p>	3.1-11 through 3.1-22	No	No	No	Yes	Yes
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EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	Where was the Impact Analyzed in the EIR?	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
				Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
b. Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	Significant and Unavoidable	<p>Policies: COS 1-2 through 1-4, COS 2-2, COS 2-4 through 2-6, COS 4-1 through 4-3, COS 6-1 through 6-5, COS 10-5, COS 10-6, COS 11-1 through 11-8, COS 12-3, COS 12-6, COS 12-9 through 12-13, COS 12-15 through 12-17, CD 1-1 through 1-3, CD 1-11 through 1-14, CD 2-1, CD 2-4, CD 2-6 through 2-8, LU 1-2, LU 1-3, LU 5-3, LU 5-4</p> <p>Actions: COS-1a and 1b, COS-2a, COS-4f, COS-6a through 6e, COS-10e and 10f, COS-11a through 11g, COS 12b through 12d, COS 12k through 12m, CD 1a through 1c, CD 1e and 1f, CD 1k, CD 2a, CD 2e, CD 2g, LU 5a</p>	3.1-11 through 3.1-22	No	No	No	Yes	Yes

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	Where was the Impact Analyzed in the EIR?	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
				Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	Significant and Unavoidable	Policies: COS 1-2 through 1-4, COS 2-2, COS 2-4 through 2-6, COS 4-1 through 4-3, COS 6-1 through 6-5, COS 10-5, COS 10-6, COS 11-1 through 11-8, COS 12-3, COS 12-6, COS 12-9 through 12-13, COS 12-15 through 12-17, CD 1-1 through 1-3, CD 1-11 through 1-14, CD 2-1, CD 2-4, CD 2-6 through 2-8, LU 1-2, LU 1-3, LU 5-3, LU 5-4  Actions: COS-1a and 1b, COS-2a, COS-4f, COS-6a through 6e, COS-10e and 10f, COS-11a through 11g, COS-12b through 12d, COS 12k through 12m, CD-1a through 1c, CD-1e and 1f, CD-1k, CD-2a, CD-2e, CD- 2g, LU-5a	3.1-11 through 3.1-22	No	No	No	Yes	Yes
d. Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?	Less than Significant	Policies: COS 11-7 through 11-8, CD 2-4  Actions: COS-11g, COS-12k	3.1-23 through 3.1-24	No	No	No	Yes	Yes

## General Plan EIR Aesthetics Findings

The General Plan EIR determined that impacts to visual character, including scenic vistas or scenic resources would be significant and unavoidable. Implementation of the policies and programs contained in the General Plan Land Use, Community Design, and Conservation and Open Space Elements would ensure that new development is designed in a way that enhances the visual quality of the community, complements the rural character of the city, and that adverse effects on public views are minimized. However, the potential for new development to interrupt scenic views, particularly new industrial and commercial development on agricultural or undeveloped lands, would remain. The implementation of General Plan Action COS-12k and Policy COS 11-8 would reduce adverse impacts associated with daytime glare and nighttime lighting to a less than significant level.

## Addendum Analysis

The Housing Element Update is a policy document consistent with the General Plan. The Housing Element Update includes housing sites located throughout the city that were evaluated previously for potential environmental impacts in the General Plan EIR. The Housing Element Update also includes ADUs as well as housing inventory sites consisting of vacant and non-vacant properties that could accommodate new or additional housing units. Since non-vacant sites already contain some type of development, housing that may be built on these sites would not create a substantial change from current conditions. Similarly, most vacant sites are urban infill sites where development and infrastructure already exist throughout the area.

The Housing Element Update, in and of itself, does not include a specific project involving a new housing development, but puts forth goals and policies that support housing efforts in Sebastopol. Because it is a policy document, the Housing Element Update would not, in and of itself, result in impacts to scenic vistas, scenic resources, or visual character, and will not create new sources of substantial light or glare which adversely affects views.

All future development would be subject to adopted development guidelines, including design standards that govern visual quality and community design. Specifically, future development would be required to comply with including the following policies and actions from the Sebastopol General Plan:

General Plan Element	Policies	Actions
Conservation and Open Space Element	COS 1-2 through 1-4, COS 2-2, COS 2-4 through 2-6, COS 4-1 through 4-3, COS 6-1 through 6-5, COS 10-5 and 10-6, COS 11-1 through 11-8, COS 12-3, COS 12-6, COS 12-9 through 12-13, COS 12-15 through 12-17	COS-1a and 1b, COS-2a, COS-4f, COS-6a through 6e, COS-10e and 10f, COS-11a through 11g, COS-12b through 12d, COS-12k through 12m
Community Design Element	CD 1-1 through 1-3, CD 1-11 through 1-14, CD 2-1, CD 2-4, CD 2-6 through 2-8	CD-1a through 1c, CD-1e and 1f, CD-1k, CD-2a, CD 2e, CD-2g
Land Use Element	LU 1-2 and 1-3, LU 5-3 and 5-4	LU-5a

Source: City of Sebastopol 2016a

## **Conclusion**

The adoption of the Housing Element Update does not involve changes to the current adopted land uses and the City's RHNA does not exceed the buildout capacity specified in the General Plan EIR. The Housing Element Update would not result in impacts beyond those addressed or analyzed in the General Plan EIR nor present new information that shows impacts would be more significant than those described in the General Plan EIR. Therefore, the General Plan EIR applies to the Housing Element Update and no additional environmental assessment of aesthetics is required.



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# 2 Agriculture and Forestry Services

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	Where was the Impact Analyzed in the EIR	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15164(a) Occur?	Project is within the Scope of General Plan EIR?
				Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
Would adoption of the Housing Element Update:								
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	Less than significant	Policies: COS 12-2 and COS 12-13 through 12-18  Actions: COS-12f through 12h	3.2-6 through 3.2-8	No	No	No	Yes	Yes
b. Conflict with existing zoning for agricultural use or a Williamson Act contract?	Less than significant	Policies: COS 12-2 and COS 12-13 through 12-18  Actions: COS-12f through 12h	3.2-8 through 3.2-9	No	No	No	Yes	Yes

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	Where was the Impact Analyzed in the EIR	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15164(a) Occur?	Project is within the Scope of General Plan EIR?
				Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)); timberland (as defined by Public Resources Code Section 4526); or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	No impact	None	3.2-6	No	No	No	Yes	Yes
d. Result in the loss of forest land or conversion of forest land to non-forest use?	No impact	None	3.2-6	No	No	No	Yes	Yes

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	Where was the Impact Analyzed in the EIR	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15164(a) Occur?	Project is within the Scope of General Plan EIR?
				Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	Less than significant	Policies: COS 12-2 and COS 12-13 through 12-18  Actions: COS-12f through 12h		No	No	No	Yes	Yes

## General Plan EIR Agriculture and Forestry Resources Findings

The General Plan EIR identified that Sebastopol does not have any prime farmlands, unique farmlands, or farmlands of statewide importance within the City’s Planning Area. Portions of locally important farmlands may be converted to accommodate additional residential and industrial opportunities. However, implementation of General Plan policies and actions would reduce impacts to less than significant impact.

The General Plan EIR determined no parcels within the Planning Area are under a Williamson Act Contract. Therefore, implementation of the project would have a less than significant impact relative to this topic and no mitigation is required.

There are no forest lands, timber lands or parcels zoned as forest land, timber, or timber production located within the Sebastopol Planning Area. Therefore, implementation of the proposed General Plan would have no impact on forest land, timber, or timber production.

## Addendum Analysis

The General Plan goals and policies aim to focus new growth and development at infill locations and to protect open space areas and agricultural lands, as there are prime farmlands just outside of the city limits. Policies and actions in the General Plan included as mitigation in the in the General Plan EIR would be implemented to help reduce impacts to the greatest extent possible. These policies and actions would be required with implementation of the Housing Element Update.

The Housing Element Update is a policy document consistent with the General Plan. The Housing Element Update includes housing sites located throughout the city that were evaluated previously for potential environmental impacts in the General Plan EIR. The Housing Element Update also includes ADUs as well as housing inventory sites consisting of vacant and non-vacant properties that could accommodate new or additional housing units. Since non-vacant sites already contain some type of development, housing that may be built on these sites would not create a substantial change from current conditions. Similarly, most vacant sites are urban infill sites where development and infrastructure already exist throughout the area. The Housing Element Update, in and of itself, does not include a specific project involving a new housing development, but puts forth goals and policies that support housing efforts in Sebastopol. Because it is a policy document, the Housing Element Update would not, in and of itself, result in impacts to farmland.

All future development would be subject to adopted development guidelines and would be required to comply with the following policies and actions from the Sebastopol General Plan:

General Plan Element	Policies	Actions
Conservation and Open Space Element	COS 12-2 and COS 12-13 through 12-18	COS-12f through 12h

Source: City of Sebastopol 2016a

## Conclusions

The adoption of the Housing Element Update does not involve changes to the current adopted land uses and the City’s RHNA does not exceed the buildout capacity specified in the General Plan EIR. The Housing Element Update would not result in impacts beyond those addressed or analyzed in the General Plan EIR nor present new information that shows impacts would be more significant than those described in the General Plan EIR. Therefore, the General Plan EIR applies to the Housing Element Update and no additional environmental assessment of agriculture and forestry resources is required.

# 3 Air Quality

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	Where was the Impact Analyzed in the EIR	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162(a) Occur?	Project is within the Scope of General Plan EIR?
				Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
Would adoption of the Housing Element Update:								
a. Conflict with or obstruct implementation of the applicable air quality plan?	Less than significant	Policies: CIR 1-2, CIR 1-8, CIR 1-9, LU 6-2, COS 5-7, COS 7-1 through 7-8, COS 8-1 through 8-6, COS 9-1 through 9-7, COS 9-16  Actions: CIR-1f, LU-6a, COS-7a through 7i, COS-8a through 8e, COS-9a through 9f	3.3-25 through 3.3-31	No	No	No	Yes	Yes
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable	Less than cumulatively considerable	Policies: CIR 1-2, CIR 1-8, CIR 1-9, LU 6-2, COS 5-7, COS 7-1 through 7-8, COS 8-1 through 8-6,	3.3-11, 3.3-12, 3.3-25, 3.3-26 and 4.0-7	No	No	No	Yes	Yes

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	Where was the Impact Analyzed in the EIR	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 (a) Occur?	Project is within the Scope of General Plan EIR?
				Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
federal or state ambient air quality standard?		Cos 9-1 through 9-7, COS 9-16  Actions: CIR-1f, LU-6a, COS-7a through 7i, COS-8a through 8e, COS-9a through 9f						
c. Expose sensitive receptors to substantial pollutant concentrations?	Less than significant	Policies: COS 7-2, COS 7-7, COS 7-8  Actions: COS-7a through 7c, COS-7g	3.3-31 through 3.3-33	No	No	No	Yes	Yes
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	Less than Significant	None	3.3-33	No	No	No	Yes	Yes

## **General Plan EIR Air Quality Findings**

The General Plan includes policies and actions that intend to improve air quality, ensure land use patterns do not expose sensitive receptors to pollutant concentrations, and mitigate the impacts associated with Toxic Air Contaminants to a less than significant level. The General Plan EIR determined that the General Plan would not disrupt or otherwise hinder the implementation of any air quality plan control. Therefore, impacts would be less than significant.

The General Plan EIR found that the General Plan would not create objectionable odors or conflict with regional plans, therefore those impacts would be less than significant.

## **Addendum Analysis**

The General Plan goals and policies support reduction of air quality impacts. Policies and actions in the General Plan included as mitigation in the General Plan EIR are implemented to help reduce impacts to the greatest extent possible. These policies and actions would be required with implementation of the Housing Element Update.

The Housing Element Update is a policy document consistent with the General Plan. The Housing Element Update includes housing sites located throughout the city that were evaluated previously for potential environmental impacts in the General Plan EIR. The Housing Element Update also includes ADUs as well as housing inventory sites consisting of vacant and non-vacant properties that could accommodate new or additional housing units. Since non-vacant sites already contain some type of development, housing that may be built on these sites would not create a substantial change from current conditions. Similarly, most vacant sites are urban infill sites where development and infrastructure already exist throughout the area. No areas in the city's SOI, where such infrastructure may not be adequate, are included in the site inventory or needed to meet the city's housing needs within this cycle.

The Housing Element Update, in and of itself, does not include a specific project involving a new housing development, but puts forth goals and policies that support housing efforts in Sebastopol. Because it is a policy document, the Housing Element Update would not, in and of itself, result in impacts to air quality. Potential air quality-related impacts cannot be assessed in a meaningful way until a project specific analysis is done covering the size of the development which includes construction air quality emissions, project operational emissions and potential vehicle miles traveled. Short-term air quality impacts resulting from construction of the sites, such as dust generated by clearing and grading activities, exhaust emissions from gas- and diesel-powered construction equipment, and vehicular emissions associated with the commuting of construction workers will be subject to Bay Area Air Quality Management District (BAAQMD) rules and protocols. Similarly, operational impacts would be addressed by provisions in the General Plan, the Sebastopol Municipal Code, and other regulations and standards that govern air quality in Sebastopol.

All future development consistent with the Housing Element Update would be required to comply with all relevant regulations related to air quality at the time of construction including the following policies and actions from the Sebastopol General Plan:



General Plan Element	Policies	Actions
Conservation and Open Space Element	COS 5-7, COS 7-1 through 7-8, COS 8-1 through 8-6, COS 9-1 through 9-7, COS 9-16, COS 7-2, COS 7-7, COS 7-8	COS-7a through 7i, COS-8a through 8e, COS-9a through 9f
Circulation Element	CIR 1-2, CIR 1-8, CIR 1-9	CIR-1f
Land Use Element	LU 6-2	LU-6a

Source: City of Sebastopol 2016a

## Conclusion

The adoption of the Housing Element Update does not involve changes to the current adopted land uses and the City’s RHNA does not exceed the buildout capacity specified in the General Plan EIR. The Housing Element Update would not result in impacts beyond those addressed or analyzed in the General Plan EIR nor present new information that shows impacts would be more significant than those described in the General Plan EIR. Therefore, the General Plan EIR applies to the Housing Element Update and no additional environmental assessment of air quality is required.

# 4 Biological Resources

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	Where was the Impact Analyzed in the EIR	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
				Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
Would adoption of the Housing Element Update:								
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	Less than significant	Policies: COS 1-1 through 1-4, COS 2-1 through 2-7, COS 3-1 through 3-14, COS 4-1 through 4-5  Actions: COS-1a, COS-1b, COS-2a, through 2d, COS-3a through 3p, COS-4a through 4h	3.4-21 through 3.4-31	No	No	No	Yes	Yes

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	Where was the Impact Analyzed in the EIR	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
				Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	Less than significant	Policies: COS 1-2, COS 2-1 through 2-3, COS 2-5, CPS 2-6, COS 3-1 through 3-6, COS 3-8 through 3-14, COS 4-2, COS 4-5  Actions: COS-1a, COS-2a, COS-2b, COS-2d, COS-3a through 3d, COS-3f through 3i, COS-3k through 3p, COS-4a, COS-4b, COS-4c, COS-4e, COS-4f,	3.4-31 through 3.4-38	No	No	No	Yes	Yes

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	Where was the Impact Analyzed in the EIR	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
				Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
c. Have a substantial adverse effect on state or federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	Less than significant	Policies: COS 2-1, COS 2-2, COS 2-5, COS 2-6, COS 3-1 through 3-6, COS 3-8, COS 3-10 through 3-14, COS 4-1, COS 4-2, COS 4-5  Actions: COS-2a, COS-2b, COS-2d, COS-3a through 3p, COS-4a through 4f, COS-4h	3.4-38 through 3.4-45	No	No	No	Yes	Yes

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	Where was the Impact Analyzed in the EIR	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
				Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	Less than significant	Policies: COS 1-2, COS 1-4, COS 2-1 through 2-6, COS 3-1 through 3-4, COS 3-8, COS 3-10, COS 3-11, COS 3-13, COS 4-1, COS 4-2, COS 4-5  Actions: COS-1a, COS-2a, COS-2b, COS-2d, COS-3b through 3i, COS-3k, COS-3l, COS-3n, COS-3o, COS-4a through 4f, COS-4h	3.4-45 through 3.4-51	No	No	No	Yes	Yes
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	Less than significant	Policies: COS 6-1, COS 6-3, COS 6-4  Actions: COS-6a through 6d	3.4-52 through 3.4-53	No	No	No	Yes	Yes

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	Where was the Impact Analyzed in the EIR	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
				Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
f. Conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or State habitat conservation plan?	Less than significant	None	3.4-53	No	No	No	Yes	Yes

## General Plan EIR Biological Resources Findings

The General Plan EIR determined that impacts to biological resources would be less than significant with incorporation of state, federal, and local regulations and General Plan policies and actions for effects to sensitive animal and plant species, sensitive natural communities, federally protected wetlands, and wildlife movement. As such, all projects proposed under General Plan implementation would be required to conform to zoning, design standards, and other regulations concerning the protection of biological resources, including listed species, habitats, and all planning resources designed to protect and conserve these resources.

### Addendum Analysis

The General Plan goals and policies aim to focus new growth and development at infill locations and to protect biological resources. Policies and actions in the General Plan included as mitigation in the General Plan EIR would be implemented to help reduce impacts to the greatest extent possible. These policies and actions would be required with implementation of the Housing Element Update.

The Housing Element Update is a policy document consistent with the General Plan. The Housing Element Update includes housing sites located throughout the city that were evaluated previously for potential environmental impacts in the General Plan EIR. The Housing Element Update also includes ADUs as well as housing inventory sites consisting of vacant and non-vacant properties that could accommodate new or additional housing units. Since non-vacant sites already contain some type of development, housing that may be built on these sites would not create a substantial change from current conditions. Similarly, most vacant sites are urban infill sites where development and infrastructure already exist throughout the area. Furthermore, protection of special status species and habitat is mandated by federal and State laws. There are no adopted Habitat Conservation Plans applicable to the City. Future development would be required to comply with General Plan policies and Sebastopol Municipal Code requirements related to species and habitat protection and tree preservation.

The Housing Element Update, in and of itself, does not include specific projects involving a new housing development, but puts forth goals and policies that support housing efforts in Sebastopol. Because it is a policy document, the Housing Element Update would not, in and of itself, result in impacts to biological resources and conservation or habitat management plans. All future development consistent with the Housing Element Update would be required to comply with applicable requirements and regulations regarding biological resources and the following policies and actions from the Sebastopol General Plan:

General Plan Element	Policies	Actions
Conservation and Open Space Element	COS 1-1 through 1-4, COS 2-1 through 2-7, COS 3-1 through 3-14, COS 4-1 through 4-5	COS-1a through 1b, COS-2a through 2d, COS-3a through 3p, COS-4a through 4h

Source: City of Sebastopol 2016a

## Conclusions

The adoption of the Housing Element Update does not involve changes to the current adopted land uses and the City’s RHNA does not exceed the buildout capacity specified in the General Plan EIR. The Housing Element Update would not result in impacts beyond those addressed or analyzed in the General Plan EIR nor present new information that shows impacts would be more significant than those described in the General Plan EIR. Therefore, the General Plan EIR applies to the Housing Element Update and no additional environmental assessment of biological resources is required.

# 5 Cultural Resources

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	Where was the Impact Analyzed in the EIR	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
				Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
Would adoption of the Housing Element Update:								
a. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	Less than significant	Policies: COS 10-1 through 10-3, COS 10-5 through 10-6, COS 10-8, CD 3-1 through 3-6  Actions: COS-10a through 10c, COS-10e through 10f, COS-10h, CD-3a through 3b, CD-3e through 3i	3.5-15 through 3.5-20	No	No	No	Yes	Yes



EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	Where was the Impact Analyzed in the EIR	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
				Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	Less than significant	Policies: COS 10-1 through 10-3, COS 10-5 through 10-6, COS 10-8, CD 3-1 through 3-6  Actions: COS-10a through 10c, COS-10e through 10f, COS-10h, CD-3a through 3b, CD-3e through 3i	3.5-15 through 3.5-20	No	No	No	Yes	Yes
c. Disturb any human remains, including those interred outside of formal cemeteries?	Less than significant	Policies: COS 10-2 Action: COS-10c	3.5-20	No	No	No	Yes	Yes

## General Plan EIR Cultural Resources Findings

The General Plan EIR determined that the General Plan includes policies and actions that would reduce impacts to cultural, historical, paleontological, and archaeological resources, as well as human remains, to less than significant level.

### Addendum Analysis

The General Plan goals and policies support reduction of impacts to cultural resources. Policies and actions in the General Plan included as mitigation in the General Plan EIR are implemented to reduce impacts to the greatest possible extent. These policies and actions would be required with implementation of the Housing Element Update.

The Housing Element Update is a policy document consistent with the General Plan. The Housing Element Update includes housing sites located throughout the city that were evaluated previously for potential environmental impacts in the General Plan EIR. The Housing Element Update also includes ADUs as well as housing inventory sites consisting of vacant and non-vacant properties that could accommodate new or additional housing units. Since non-vacant sites already contain some type of development, housing that may be built on these sites would not create a substantial change from current conditions. Similarly, most vacant sites are urban infill sites where development and infrastructure already exist throughout the area. Although known historic and prehistoric resource sites are located throughout Sebastopol, and 111 cultural resources have been recorded within the city, future development would be evaluated for conformance with the City’s General Plan, Municipal Code, and other applicable State and local regulations.

As discussed in Section 18, *Tribal Cultural Resources*, of this Addendum, tribal consultation compliant with SB 18 and AB 52 was conducted during the Housing Element update process.

The Housing Element Update, in and of itself, does not include specific projects involving a new housing development, but puts forth goals and policies that support housing efforts in Sebastopol. Because it is a policy document, the Housing Element Update would not, in and of itself, result in impacts to cultural resources. All future development consistent with the Housing Element Update would be required to comply with applicable policies and regulations regarding cultural resources including the following policies and actions from the Sebastopol General Plan:

General Plan Element	Policies	Actions
Conservation and Open Space Element	COS 10-1 through 10-3, COS 10-5 through 10-6, COS 10-8	COS-2a, COS-10b through 10c, COS-10e through 10f, COS-10h
Community Design Element	CD 3-1 through 3-6	CD-2a, CD-3a through 3b, CD-3e through 3i

Source: City of Sebastopol 2016a

## Conclusions

The adoption of the Housing Element Update does not involve changes to the current adopted land uses and the City’s RHNA does not exceed the buildout capacity specified in the General Plan EIR. The Housing Element Update would not result in impacts beyond those addressed or analyzed in the General Plan EIR nor present new information that shows impacts would be more significant than those described in the General Plan EIR. Therefore, the General Plan EIR applies to the Housing Element Update and no additional environmental assessment of cultural resources is required.

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# 6 Energy

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	Where was the Impact Analyzed in the EIR	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
				Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
Would adoption of the Housing Element Update:								
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	Less than significant	Policies: COS 8-1 through 8-3, COS 9-1 through 9-7, COS 9-16  Actions: COS-9a through 9f	3.7-15 through 3.7-24	No	No	No	Yes	Yes
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	Less than significant	Policies: COS 8-1 through 8-3, COS 9-1 through 9-7, COS 9-16  Actions: COS 8a through 8e, COS-9a through 9f	3.7-15 through 3.7-24	No	No	No	Yes	Yes

## General Plan EIR Energy Findings

The General Plan EIR discusses energy in Section 3.7, *Greenhouse Gases and Climate Change*. At the time the General Plan EIR was prepared, there were no adopted thresholds for energy use under CEQA. The General Plan EIR concluded that with compliance with the City’s Community Climate Action Plan (CCAP) and AB 32, as well as the City’s Electrical, Energy, and Green Building Standards, impacts to energy would be less than significant regarding wasteful or unnecessary energy consumption and would not conflict with or obstruct State or local plans for renewable energy or energy efficiency.

After the General Plan EIR was certified, the City updated its climate documentation. A Climate Action Framework, which updates the CCAP, was adopted by the City Council on July 19, 2022.

## Addendum Analysis

The General Plan goals and policies support reduction of energy use impacts. Policies and actions in the General Plan included as mitigation in the General Plan EIR are implemented to help reduce impacts to the greatest extent possible. These policies and actions would be required with implementation of the Housing Element Update.

The Housing Element Update is a policy document consistent with the General Plan. The Housing Element Update includes housing sites located throughout the city that were evaluated previously for potential environmental impacts in the General Plan EIR. The Housing Element Update also includes ADUs as well as housing inventory sites consisting of vacant and non-vacant properties that could accommodate new or additional housing units. New projects would be required to adhere to the current California Energy Code and CALGreen standards, which include requirements for the use of more energy-efficient design and technologies as well as the incorporation of more renewable energy resources into building design than the 2013 CALGreen standards that were in place during the General Plan EIR analysis. New development would use electricity supplied by PG&E, which sourced 50 percent of their electricity in 2021 from renewable resources that qualify under California’s Renewable Portfolio Standard (RPS) (PG&E 2022).

The Housing Element Update, in and of itself, does not include a specific project involving a new housing development but puts forth goals and policies that support housing efforts in Sebastopol. Because it is a policy document, the Housing Element Update would not, in and of itself, result in impacts to energy resources or adopted plans for renewable or efficient energy use. Although future projects would involve the consumption of non-renewable energy resources such as electricity, natural gas, propane, gasoline, and diesel, they would be required to comply with State and local regulations pertaining to energy, such as Title 20, Energy Building Regulation, and Title 24, Energy Conservation Standards, of the California Code of Regulations (CCR).

Future development would also be required to comply with the following policies and actions from the Sebastopol General Plan:

General Plan Element	Policies	Actions
Conservation and Open Space Element	COS 8-1 through 8-3, COS 9-1 through 9-1, COS 9-16	COS 8a through 8e COS-9a through 9f

Source: City of Sebastopol 2016a

## **Conclusion**

The adoption of the Housing Element Update does not involve changes to the current adopted land uses and the City's RHNA does not exceed the buildout capacity specified in the General Plan EIR. The Housing Element Update would not result in impacts beyond those addressed or analyzed in the General Plan EIR nor present new information that shows impacts would be more significant than those described in the General Plan EIR. Therefore, the General Plan EIR applies to the Housing Element Update and no additional environmental assessment of energy is required.

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# 7 Geology and Soils

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	Where was the Impact Analyzed in the EIR	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
				Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
Would adoption of the Housing Element Update:								
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				No	No	No	Yes	Yes
1. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?	Less than significant	Policies: SA 1-1 through SA 1-8 Actions: SA-1a through 1q	3.6-19 through 3.6-22	No	No	No	Yes	Yes



EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	Where was the Impact Analyzed in the EIR	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
				Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
2. Strong seismic ground shaking?	Less than significant	Policies: SA 1-1 through SA 1-8 Actions: SA-1a through 1q	3.6-19 through 3.6-22	No	No	No	Yes	Yes
3. Seismic-related ground failure, including liquefaction?	Less than significant	Policies: SA 1-1 through SA 1-8 Actions: SA-1a through 1q	3.6-19 through 3.6-22	No	No	No	Yes	Yes
4. Landslides?	Less than significant	Policies: SA 1-1 through SA 1-8 Actions: SA-1a through 1h, SA-1m	3.6-23 through 3.6-26	No	No	No	Yes	Yes
b. Result in substantial soil erosion or the loss of topsoil?	Less than significant	Policies: SA 1-4 Actions: SA-1e through 1h, SA-2d	3.6-22 through 3.6-23	No	No	No	Yes	Yes
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and	Less than significant	Policies: SA-1 through SA-9	3.6-23 through 3.6-26	No	No	No	Yes	Yes

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	Where was the Impact Analyzed in the EIR	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162(a) Occur?	Project is within the Scope of General Plan EIR?
				Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?		Actions: SA-1a through 1h, SA-1m						
d. Be located on expansive soil, as defined in Table 1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	Less than significant	Policies: SA 1-4, SA 1-5, SA 1-7 Actions: SA-1a through 1c, SA-1h	3.6-26 through 3.6-28	No	No	No	Yes	Yes
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	Less than significant	Policies: CSF 4-8, CSF 4-9	3.6-28 through 3.6-29	No	No	No	Yes	Yes
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Less than significant	Action: COS-10c	3.5-21	No	No	No	Yes	Yes

## General Plan EIR Geology and Soils Findings

The General Plan EIR determined that potentially significant impacts to geology and soils for adverse effects related to rupture of a known fault, strong ground shaking, seismic-related ground failure, or landslides; soil erosion; landslide, lateral spreading, subsidence, liquefaction, or collapse; locating development on expansive soils; and installing septic tanks and alternative wastewater disposal systems in expansive soils would be mitigated to less than significant levels.

The General Plan EIR addressed paleontological resources in Section 3.5, *Cultural Resources*, and determined that potentially significant impacts to paleontological resources would be mitigated to less than significant levels.

## Addendum Analysis

The General Plan goals and policies support reduction of impacts to geology and soils. Policies and actions in the General Plan included as mitigation in the General Plan EIR are implemented to reduce impacts to the greatest possible extent. These policies and actions would be required with implementation of the Housing Element Update.

The Housing Element Update is a policy document consistent with the General Plan. The Housing Element Update includes housing sites located throughout the city that were evaluated previously for potential environmental impacts in the General Plan EIR. The Housing Element Update also includes ADUs as well as housing inventory sites consisting of vacant and non-vacant properties that could accommodate new or additional housing units. Since non-vacant sites already contain some type of development, housing that may be built on these sites would not create a substantial change from current conditions. Similarly, most vacant sites are urban infill sites where development and infrastructure already exist throughout the area.

The Housing Element Update, in and of itself, does not include specific projects involving a new housing development, but puts forth goals and policies that support housing efforts in Sebastopol. Because it is a policy document, the Housing Element Update would not, in and of itself, result in impacts to cultural resources. All future development consistent with the Housing Element Update would be required to comply with relevant policies and regulations regarding geology and soils including the following policies and actions from the Sebastopol General Plan:

General Plan Element	Policies	Actions
Safety	SA 1-1 through 1-8	SA-1a through 1q, SA-2d
Conservation and Open Space Element		COS-10c
Community Services and Facilities	CSF 4-8 through 4-9	

Source: City of Sebastopol 2016a

## Conclusions

The adoption of the Housing Element Update does not involve changes to the current adopted land uses and the City’s RHNA does not exceed the buildout capacity specified in the General Plan EIR. The Housing Element Update would not result in impacts beyond those addressed or analyzed in the General Plan EIR nor present new information that shows impacts would be more significant than those described in the General Plan EIR. Therefore, the General Plan EIR applies to the Housing Element Update and no additional environmental assessment of geology and soils is required.

# 8 Greenhouse Gas Emissions

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	Where was the Impact Analyzed in the EIR	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162(a) Occur?	Project is within the Scope of General Plan EIR?
				Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
Would adoption of the Housing Element Update:								
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Less than significant	Policies: COS 5-7, COS 7-1 through 7-6, COS 8-1 through 8-6, COS 9-1 through 9-7, COS 9-16 Actions: COS-7a through 7e, COS-7h, COS-7i, COS-8a through 8e, COS-9a through 9f	3.7-15 through 3.7-24	No	No	No	Yes	Yes
b. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	Less than significant	Policies: COS 5-7, COS 7-1 through 7-6, COS 8-1 through 8-6, COS 9-1 through 9-7, COS 9-16 Actions: COS-7a through 7e, COS-7h, COS-7i, COS-8a through 8e, COS-9a through 9f	3.7-24 through 3.7-25	No	No	No	Yes	Yes

## General Plan EIR Greenhouse Gas Emissions Findings

The General Plan EIR determined that development allowed under the General Plan would result in new projects that would increase greenhouse gas emissions in the Sebastopol Planning Area. The General Plan is consistent with the policy guidance provided by California Air Pollution Control Officers Association (CAPCOA) and the BAAQMD and would assist the state in meeting the greenhouse gas reduction goals established by AB 32. Therefore, this impact is less than significant. Impacts relating to conflicts with plans, policies, and regulations adopted to reduce greenhouse gases would also be less than significant.

## Addendum Analysis

The General Plan goals and policies support reduction of greenhouse gas emissions impacts. Policies and actions in the General Plan included as mitigation in the General Plan EIR are implemented to help reduce impacts to the greatest extent possible. These policies and actions would be required with implementation of the Housing Element Update.

The Housing Element Update is a policy document consistent with the General Plan. The Housing Element Update includes housing sites located throughout the city that were evaluated previously for potential environmental impacts in the General Plan EIR. The Housing Element Update also includes ADUs as well as housing inventory sites consisting of vacant and non-vacant properties that could accommodate new or additional housing units. Since non-vacant sites already contain some type of development, housing that may be built on these sites would not create a substantial change from current conditions. Similarly, most vacant sites are urban infill sites where development and infrastructure already exist throughout the area.

Potential greenhouse gas emission impacts cannot be assessed in a meaningful way until a project-specific analysis that takes into account factors including the size of the development, construction greenhouse gas emissions, project operational emissions, and potential vehicle miles traveled is conducted. Because it is a policy document, the Housing Element Update would not, in and of itself, result in impacts to greenhouse gas emissions or adopted plans for the purpose of reducing greenhouse gases. Future development consistent with the Housing Element Update would be required to adhere to applicable climate and greenhouse gas emissions policies and regulations including consistency with SB 32, AB 32, SB 97, and SB 375. Future development would also be required to comply with the following policies and actions from the Sebastopol General Plan:

General Plan Element	Policies	Actions
Conservation and Open Space Element	COS 5-7, COS 7-1 through 7-6, COS 8-1 through 8-6, COS 9-1 through 9-7, COS 9-16	COS-7a through 7e, COS-7h, COS-7i, COS-8a through 8e, COS-9a through 9f

Source: City of Sebastopol 2016a

## Conclusion

The adoption of the Housing Element Update does not involve changes to the current adopted land uses and the City's RHNA does not exceed the buildout capacity specified in the General Plan EIR. The Housing Element Update would not result in impacts beyond those addressed or analyzed in the General Plan EIR nor present new information that shows impacts would be more significant than those described in the General Plan EIR. Therefore, the General Plan EIR applies to the Housing Element Update and no additional environmental assessment of greenhouse gas emissions is required.

# 9 Hazards and Hazardous Materials

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	Where was the Impact Analyzed in the EIR	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
				Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
Would adoption of the Housing Element Update:								
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Less than significant	Policies: SA 6-1 through 6-5 Actions: SA-6a through 6h	3.8: 18-20	No	No	No	Yes	Yes
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	Less than significant	Policies: SA 6-1 through 6-5 Actions: SA-6a through 6h	3.8: 18-20					

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	Where was the Impact Analyzed in the EIR	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162(a) Occur?	Project is within the Scope of General Plan EIR?
				Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?	Less than significant	Policies: SA 6-1 through 6-5 Actions: SA-6a through 6h	3.8: 20-21	No	No	No	Yes	Yes
d. Be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	Less than significant	Policies: SA 6-1 through 6-5 Actions: SA-6a through 6h	3.8: 21-23	No	No	No	Yes	Yes

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	Where was the Impact Analyzed in the EIR	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162(a) Occur?	Project is within the Scope of General Plan EIR?
				Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
e. Result in a safety hazard for people residing or working within an airport land use plan area, or where such a plan has not been adopted, within two miles of a public airport or public use airport?	Less than significant	None	3.8: 23-24	No	No	No	Yes	Yes
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Less than significant	Policies: SA 1-8, SA 3-1 through 3-7 Actions: SA-3a through 3e	3.8: 24-26	No	No	No	Yes	Yes
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	Less than significant	Policies: SA 4-1 through 4-9 Actions: SA-3f, SA-4a through 4n	3.8: 26-29	No	No	No	Yes	Yes



## General Plan EIR Hazards and Hazardous Materials Findings

The General Plan EIR determined that impacts would be less than significant regarding the potential to create a significant hazard to the public through the routine transport, use, or disposal of hazardous materials; emission of hazardous emissions or handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school; or location of projects on sites included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.

The General Plan EIR found that the General Plan Area is not located within an airport land use plan, two miles of a public airport or public use airport, or within the vicinity of a private airstrip, and implementation of the General Plan does not have the potential to impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

The General Plan EIR found that impacts regarding the potential to expose people or structures to a significant risk of loss, injury or death involving wildland fires would be less than significant.

## Addendum Analysis

The General Plan goals and policies support reduction of hazards and hazardous materials impacts. Policies and actions in the General Plan included as mitigation in the General Plan EIR are implemented to help reduce impacts to the greatest extent possible. These policies and actions would be required with implementation of the Housing Element Update.

The Housing Element Update is a policy document consistent with the General Plan. The Housing Element Update includes housing sites located throughout the city that were evaluated previously for potential environmental impacts in the General Plan EIR. The Housing Element Update also includes ADUs as well as housing inventory sites consisting of vacant and non-vacant properties that could accommodate new or additional housing units. The City requires new projects to analyze potential site-specific hazardous waste impacts pursuant to State regulations.

The Housing Element Update, in and of itself, does not include a specific project involving a new housing development, but puts forth goals and policies that support housing efforts in Sebastopol. Because it is a policy document, the Housing Element Update would not, in and of itself, result in impacts to hazards or hazardous materials. All future development consistent with the Housing Element Update would be required to comply with applicable policies and guidelines regarding hazards and hazardous materials including the following policies and actions from the Sebastopol General Plan:

General Plan Element	Policies	Actions
Safety	SA 1-8, SA 3-1 through 3-7, SA 4-1 through 4-9, SA 6-1 through 6-5	SA-3a through 3f, SA-4a through 4n, SA-6a through 6h

Source: City of Sebastopol 2016a

## Conclusions

The adoption of the Housing Element Update does not involve changes to the current adopted land uses and the City’s RHNA does not exceed the buildout capacity specified in the General Plan EIR. The Housing Element Update would not result in impacts beyond those addressed or analyzed in the General Plan EIR nor present new information that shows impacts would be more significant than those described in the General Plan EIR. Therefore, the General Plan EIR applies to the Housing Element Update and no additional environmental assessment of hazards and hazardous materials is required.

# 10 Hydrology and Water Quality

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	Where was the Impact Analyzed in the EIR	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
				Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
Would adoption of the Housing Element Update:								
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	Less than significant	Policies: COS 3-1 through 3-14 Actions: COS-3a through 3p	3.9-15 through 3.9-20, 3.9-29 through 3.9-33	No	No	No	Yes	Yes
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	Less than significant	Policies: CSF 3-1 through 3-10, COS 5-1 through 5-10 Actions: CSF-3a through 3j, COS-5a through 5k	3.9-20 through 3.9-26	No	No	No	Yes	Yes

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	Where was the Impact Analyzed in the EIR	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 (15164(a)) Occur?	Project is within the Scope of General Plan EIR?
				Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or by increasing the rate or amount of surface runoff, in a manner that would result in substantial erosion, siltation, or flooding on- or off-site; substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or offsite; create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems impede or redirect floodflows?	Less than significant	Policies: CSF 1-4, CSF 1-5, CSF 4-4, COS 3-4 through 3-8, COS 3-11, COS 5-4, COS 9-14, SA 2-1, through 2-13  Actions: COS-3a. COS-3d through 3f, COS-3j, COS-3o through 3p, COS-9n, CSF-1c, SA-2a through 2o	3.9-26 through 3.6-29, 3.9-33 through 37	No	No	No	Yes	Yes

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	Where was the Impact Analyzed in the EIR	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162(a) Occur?	Project is within the Scope of General Plan EIR?
				Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	Significant and Unavoidable	Policies: CSF 1-4, CSF 1-5, CSF 4-4, COS 3-4 through 3-8, COS 3-11, COS 5-4, COS 9-14, SA 2-1, through 2-13  Actions: COS-3a, COS-3d through 3f, COS-3j, COS-3o through 3p, COS-9n, CSF-1c, SA-2a through 2o	3.9-26 through 3.9-29, 3.9-33 through 3.9-38	No	No	No	Yes	Yes
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	Less than significant	Policies: COS 3-1 through 3-14  Actions: COS-3a through 3p	3.9-17	No	No	No	Yes	Yes

## General Plan EIR Hydrology and Water Quality Findings

The General Plan EIR addresses the potential for General Plan implementation to place housing and structures within a 100-year flood hazard area, which was included as an environmental factor on the 2016 CEQA Environmental Checklist form. The General Plan EIR determined that implementation of the General Plan could result in additional people and structures placed within a delineated flood hazard area. This impact would be mitigated to the greatest extent feasible through the General Plan policies and actions listed in the table above (criterion d). However, this impact would be significant and unavoidable.

The General Plan EIR found that implementation of the General Plan policies and actions would ensure that the General Plan would have a less than significant impact regarding water quality standards or waste discharge requirements; groundwater supplies or groundwater recharge; water quality; and erosion, siltation, flooding, or polluted runoff. The General Plan policies and actions would also ensure that the General Plan would not expose people or structures to a significant risk from dam failure, tsunamis, seiches, or mudflow, or conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

## Addendum Analysis

The General Plan goals and policies support reduction of hydrology and water quality impacts. Policies and actions in the General Plan included as mitigation in the General Plan EIR are implemented to help reduce impacts to the greatest extent possible. These policies and actions would be required with implementation of the Housing Element Update.

The Housing Element Update is a policy document consistent with the General Plan. The Housing Element Update includes housing sites located throughout the city that were evaluated previously for potential environmental impacts in the General Plan EIR. The Housing Element Update also includes ADUs as well as housing inventory sites consisting of vacant and non-vacant properties that could accommodate new or additional housing units. Since non-vacant sites already contain some type of development and none of the non-vacant sites in the Housing Sites Inventory are located within the floodplain area, housing that may be built on these sites would not create a substantial change from current conditions. The Housing Element Update includes three vacant parcels located within a floodplain area that were included previously in the 2015-2023 Housing Sites Inventory. The Housing Element update does not include any new sites that are located within a floodplain area. Furthermore, the City of Sebastopol adopted a Local Hazard Mitigation Plan on June 7, 2022 to minimize new development in hazard-prone areas including floodplains (City of Sebastopol 2021).

The Housing Element Update, in and of itself, does not include a specific project involving a new housing development, but puts forth goals and policies that support housing efforts in Sebastopol. Because it is a policy document, the Housing Element Update would not, in and of itself, result in impacts to hydrology or water quality. All future development consistent with the Housing Element Update would be required to comply with applicable regulations and requirements related to hydrology and water quality including the following policies and actions from the Sebastopol General Plan:

<b>General Plan Element</b>	<b>Policies</b>	<b>Actions</b>
Conservation and Open Space Element	COS 3-1 through 3-14, COS 5-1 through 5-10, COS 9-14	COS-3a through 3p, COS-9n
Community Services and Facilities Element	CSF 1-4, CSF 1-5, CSF 4-4	CSF-1c, CSF-3a through 3j, CSF-5a through 5k
Safety Element	SA 2-1, through 2-13	SA-2a through 2o

Source: City of Sebastopol 2016a

## Conclusions

The adoption of the Housing Element Update does not involve changes to the current adopted land uses and the City’s RHNA does not exceed the buildout capacity specified in the General Plan EIR. The Housing Element Update would not result in impacts beyond those addressed or analyzed in the General Plan EIR nor present new information that shows impacts would be more significant than those described in the General Plan EIR. Therefore, the General Plan EIR applies to the Housing Element Update and no additional environmental assessment of hydrology and water quality is required.

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# 11 Land Use and Planning

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	Where was the Impact Analyzed in the EIR	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
				Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
Would adoption of the Housing Element Update:								
a. Physically divide an established community?	Less than significant	None	3.10-13	No	No	No	Yes	Yes
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	Less than significant	None	3.10-13 through 3.10-14	No	No	No	Yes	Yes



## **General Plan EIR Land Use Planning Findings**

The General Plan EIR determined that impacts to land use and planning would be less than significant as they pertain to conflicts with applicable land use plans, population growth, and potential to displace people or existing housing. It found that the General Plan does not include any new areas designated for urbanization or new roadways, infrastructure, or other features that would divide existing communities and would have a less than significant impact associated with the physical division of an established community.

## **Addendum Analysis**

The General Plan goals and policies support reduction of impacts due to land use and planning. No formal land use changes or physical development are proposed at the time of adoption of the Housing Element, and no rezoning is required for the Housing Inventory Sites included in the Housing Element Update.

The Housing Element Update is a policy document consistent with the General Plan. The Housing Element Update includes housing sites located throughout the city that were evaluated previously for potential environmental impacts in the General Plan EIR. The Housing Element Update also includes ADUs as well as housing inventory sites consisting of vacant and non-vacant properties that could accommodate new or additional housing units. Since non-vacant sites already contain some type of development, housing that may be built on these sites would not create a substantial change from current conditions. Similarly, most vacant sites are urban infill sites where development and infrastructure already exist throughout the area.

The Housing Element Update, in and of itself, does not include a specific project involving a new housing development, but puts forth goals and policies that support housing efforts in Sebastopol. Because it is a policy document, the Housing Element Update would not, in and of itself, result in impacts due to land use or planning. All future development consistent with the Housing Element Update would be required to comply with applicable regulations and requirements related to land use and planning.

## **Conclusions**

The adoption of the Housing Element Update does not involve changes to the current adopted land uses and the City's RHNA does not exceed the buildout capacity specified in the General Plan EIR. The Housing Element Update would not result in impacts beyond those addressed or analyzed in the General Plan EIR nor present new information that shows impacts would be more significant than those described in the General Plan EIR. Therefore, the General Plan EIR applies to the Housing Element Update and no additional environmental assessment of land use and planning is required.

# 12 Mineral Resources

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	Where was the Impact Analyzed in the EIR	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
				Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
Would adoption of the Housing Element Update:								
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	Less than significant	None	3.6-29 through 3.6-30	No	No	No	Yes	Yes
b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	Less than significant	None	3.6-29 through 3.6-30	No	No	No	Yes	Yes

## General Plan EIR Mineral Resources Findings

The General Plan EIR discusses mineral resources in Section 3.6, *Geology, Soils, and Minerals*. The General Plan EIR determined that the City is not mapped as having a known mineral resource of value to the region. Additionally, the City is not designated as a locally important mineral resource recovery site. Therefore, this impact would be less than significant.

## Addendum Analysis

The Housing Element Update is a policy document consistent with the General Plan. The Housing Element Update includes housing sites located throughout the city that were evaluated previously for potential environmental impacts in the General Plan EIR. The Housing Element Update also includes ADUs as well as housing inventory sites consisting of vacant and non-vacant properties that could accommodate new or additional housing units. Since non-vacant sites already contain some type of development, housing that may be built on these sites would not create a substantial change from current conditions. Similarly, most vacant sites are urban infill sites where development and infrastructure already exist throughout the area.

The Housing Element Update, in and of itself, does not include a specific project involving a new housing development, but puts forth goals and policies that support housing efforts in Sebastopol. Because it is a policy document, the Housing Element Update would not, in and of itself, result in impacts due to mineral resources. All future development consistent with the Housing Element Update would be required to comply with applicable regulations and requirements related to mineral resources.

## Conclusions

The adoption of the Housing Element Update does not involve changes to the current adopted land uses and the City's RHNA does not exceed the buildout capacity specified in the General Plan EIR. The Housing Element Update would not result in impacts beyond those addressed or analyzed in the General Plan EIR nor present new information that shows impacts would be more significant than those described in the General Plan EIR. Therefore, the General Plan EIR applies to the Housing Element Update and no additional environmental assessment of mineral resources is required.

# 13 Noise

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	Where was the Impact Analyzed in the EIR	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 (15164(a)) Occur?	Project is within the Scope of General Plan EIR?
				Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
Would adoption of the Housing Element Update:								
a. Generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of a project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	Significant and unavoidable	Policies: N 1-1 through 1-10, N 2-2, N 2-4  Actions: N-1a, N-1c through N-1e	3.11-20 through 3.11-27	No	No	No	Yes	Yes
b. Generate excessive vibration of groundborne noise levels?	Less than significant with mitigation incorporated	Policies: N 1-1, N 1-3 through N 1-7, N 1-11, N-13 through N-19, N 2-1, N 2-3  Actions: N-1a through 1d, N1-f, N-2a, N-2b	3.11-35 through 3.11-36	No	No	No	Yes	Yes

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	Where was the Impact Analyzed in the EIR	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 (a) Occur?	Project is within the Scope of General Plan EIR?
				Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
c. Result in a project that exposes people residing or working in the project area to excessive noise levels due to the project's location within an airport land use plan area or within two miles of a public airport or public use airport?	No Impact	None	3.11-20	No	No	No	Yes	Yes

## General Plan EIR Noise Findings

The General Plan EIR determined that buildout of the General Plan may contribute to an exceedance of the City’s transportation noise standards and/or result in significant increases in traffic noise levels at existing sensitive receptors. Implementation of the proposed policies and actions of the General Plan would reduce noise and land use compatibility impacts from vehicular traffic noise sources and would ensure that new development is designed to include noise-attenuating features; however, some traffic noise impacts cannot be mitigated to a less-than-significant level due the proximity of sensitive receivers to major roadways, and because noise attenuation may not be feasible in all circumstances. Therefore, the General Plan would have a significant and unavoidable impact relative to traffic noise. Impacts from stationary noise sources, construction, and construction vibration would be mitigated to a less than significant level through implementation of General Plan policies and actions.

## Addendum Analysis

The General Plan goals and policies support reduction of noise-related impacts. Policies and actions in the General Plan included as mitigation in the General Plan EIR are implemented to help reduce noise-related impacts to the greatest extent possible. These policies and actions would be required with implementation of the Housing Element Update.

The Housing Element Update is a policy document consistent with the General Plan. The Housing Element Update includes housing sites located throughout the city that were evaluated previously for potential environmental impacts in the General Plan EIR. The Housing Element Update also includes ADUs as well as housing inventory sites consisting of vacant and non-vacant properties that could accommodate new or additional housing units. Since non-vacant sites already contain some type of development, housing that may be built on these sites would not create a substantial change from current conditions. Similarly, most vacant sites are urban infill sites where development and infrastructure already exist throughout the area. Potential noise impacts for projects requiring discretionary approval cannot be assessed in a meaningful way until a project specific analysis, if required, is done covering the size of the development which includes construction noise, project operational noise and traffic-related noise.

The Housing Element Update, in and of itself, does not include a specific project involving a new housing development, but puts forth goals and policies that support housing efforts in Sebastopol. Because it is a policy document, the Housing Element Update would not, in and of itself, result in noise-related impacts. All future development consistent with the Housing Element Update would be required to comply with all relevant policies and guidelines regarding noise including the following policies and actions from the Sebastopol General Plan:

General Plan Element	Policies	Actions
Noise Element	N 1-1 through 1-19, N 2-1 through 2-4	N-1a, N-1c through 1f, N-2a, N-2b

Source: City of Sebastopol 2016a

## Conclusions

The adoption of the Housing Element Update does not involve changes to the current adopted land uses and the City’s RHNA does not exceed the buildout capacity specified in the General Plan EIR. The Housing Element Update would not result in impacts beyond those addressed or analyzed in the General Plan EIR nor present new information that shows impacts would be more significant than those described in the General Plan EIR. Therefore, the General Plan EIR applies to the Housing Element Update and no additional environmental assessment of noise is required.

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# 14 Population and Housing

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	Where was the Impact Analyzed in the EIR	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162(a) Occur?	Project is within the Scope of General Plan EIR?
				Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
Would adoption of the Housing Element Update:								
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	Less than significant	None	3.10-14 through 3.10-16	No	No	No	Yes	Yes
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	Less than significant	None	3.10-16	No	No	No	Yes	Yes



## General Plan EIR Population and Housing Findings

The General Plan EIR discusses population and housing in Section 3.10, *Land Use, Population, and Housing*. The General Plan EIR determined that residences may be removed as part of future development activities allowed under the proposed General Plan; however, the proposed General Plan would accommodate approximately 750 to 1,185 new housing units which would provide adequate replacement housing opportunities for any displacement that occurs. New growth due to the full buildout of the General Plan would increase the City's population by approximately 2,619 residents. Sections 3.1 through 3.9 and 3.11 through 4.0 of the General Plan EIR provide a discussion of environmental effects associated with development allowed under the proposed General Plan and provide mitigation measures, where appropriate, to reduce or eliminate potentially significant impacts associated with specific environmental issues associated with growth.

Therefore, implementation of the General Plan would result in a less than significant impact relating to population growth and the displacement of people or housing.

## Addendum Analysis

The 213 units that would be accommodated by the Housing Element Update would not exceed the 750 units included in the City's buildout capacity estimated under the General Plan and analyzed in the General Plan EIR. Assuming an average of 2.13 persons per household, the Housing Element Update would result in a population growth of approximately 1,598 residents which is within the General Plan buildout analyzed in the General Plan EIR (DOF 2022). The Housing Element Update would be consistent with State requirements for the RHNA to plan adequately to meet existing and projected housing needs for all economic segments of the community and the City's Growth Management Ordinance which limits the annual increase of residential allocations to 50 units per year outside the Central Core designation.

The Housing Element Update is a policy document consistent with the General Plan. The Housing Element Update includes housing sites located throughout the city that were evaluated previously for potential environmental impacts in the General Plan EIR. The Housing Element Update also includes ADUs as well as housing inventory sites consisting of vacant and non-vacant properties that could accommodate new or additional housing units. Since non-vacant sites already contain some type of development, housing that may be built on these sites would not create a substantial change from current conditions. Similarly, most vacant sites are urban infill sites where development and infrastructure already exist throughout the area.

The Housing Element Update, in and of itself, does not include a specific project involving a new housing development, but puts forth goals and policies that support housing efforts in Sebastopol. All future development would be required to comply with applicable guidelines and regulations including policies and actions outlined in Sections 1, *Aesthetics*, through 13, *Noise*, and 15, *Public Services*, through 20, *Wildfire*, of this Addendum.

## Conclusions

The adoption of the Housing Element Update does not involve changes to the current adopted land uses and the City's RHNA does not exceed the buildout capacity specified in the General Plan EIR. The Housing Element Update would not result in impacts beyond those addressed or analyzed in the General Plan EIR nor present new information that shows impacts would be more significant than those described in the General Plan EIR. Therefore, the General Plan EIR applies to the Housing Element Update and no additional environmental assessment of population and housing is required.

# 15 Public Services

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	Where was the Impact Analyzed in the EIR	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
				Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
Would adoption of the Housing Element Update:								
a. Result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, or the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?	Less than significant	Policies CSF 1-1 through 1-7, CSF 1-12, CSF 2-4, CSF 2-15, CSF 2-17, CSF 5-2, CSF 5-4, CSF 5-5 through 5-8, CSF 6-3, CSF 6-4, CSF 6-12, CSF 6-16  Actions: CSF-1a through 1i, CSF-2e, CSF-2n, CSF-5a through 5m, CSF-6a, CSF-6b, CSF-6h, CSF-6j	3.12-11 through 3.12-17	No	No	No	Yes	Yes

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	Where was the Impact Analyzed in the EIR	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
				Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
b. Result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, or the need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?	Less than significant	Policies CSF 1-1 through 1-7, CSF 1-12, CSF 2-4, CSF 2-15, CSF 2-17, CSF 5-2, CSF 5-4, CSF 5-5 through 5-8, CSF 6-3, CSF 6-4, CSF 6-12, CSF 6-16  Actions: CSF-1a through 1i, CSF-2e, CSF-2n, CSF-5a through 5m, CSF-6a, CSF-6b, CSF-6h, CSF-6j	3.12-11 through 3.12-17	No	No	No	Yes	Yes
c. Result in substantial adverse physical impacts associated with the provision of new or physically altered schools, or the need for	Less than significant	Policies CSF 1-1 through 1-7, CSF 1-12, CSF 2-4, CSF 2-15, CSF 2-17, CSF 5-2, CSF 5-4,	3.12-11 through 3.12-17	No	No	No	Yes	Yes

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	Where was the Impact Analyzed in the EIR	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162(a) Occur?	Project is within the Scope of General Plan EIR?
				Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
new or physically altered schools, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?		CSF 5-5 through 5-8, CSF 6-3, CSF 6-4, CSF 6-12, CSF 6-16  Actions: CSF-1a through 1i, CSF-2e, CSF-2n, CSF-5a through 5m, CSF-6a, CSF-6b, CSF-6h, CSF-6j						
d. Result in substantial adverse physical impacts associated with the provision of new or physically altered parks, or the need for new or physically altered parks, the construction of which could cause significant environmental impacts, in order to maintain acceptable service	Less than significant	Policies: CSF 2-1 through CSF 2-22  Actions: CSF-2a through 2t	3.12-18 through 3.12-23	No	No	No	Yes	Yes

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	Where was the Impact Analyzed in the EIR	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162(a) Occur?	Project is within the Scope of General Plan EIR?
				Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
ratios or other performance objectives?								
e. Result in substantial adverse physical impacts associated with the provision of new or physically altered public facilities, or the need for new or physically altered public facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?	Less than significant	Policies: CSF 1-1 through 1-7, CSF 1-12, CSF 2-4, CSF 2-15, CSF 2-17, CSF 5-2, CSF 5-4 through 5-8, CSF 5-10, CSF 6-3, CSF 6-5, CSF 6-12, CSF 6-16  Actions: CSF-1a through 1i, CSF-2e, CSF-2n, CSF-5a through 5m, CSF-6a, CSF-6b, CSF-6h, CSF-6j	3.12-11 through 3.12-17	No	No	No	Yes	Yes

## General Plan EIR Public Services Findings

The General Plan EIR identifies policies and actions to reduce the impact of potentially significant or significant impacts of development that may occur under the General Plan and discloses which impacts cannot be reduced to a less than significant impact. Expanded government and public facilities would be primarily provided on sites with land use designations that allow such uses and the environmental impacts of constructing and operating the governmental facilities would likely be similar to those associated with new development, redevelopment, and infrastructure projects under the General Plan. No additional significant adverse environmental impacts, apart from those disclosed in the relevant chapters of the General Plan EIR, are anticipated to occur associated with existing or new public service development. Therefore, this impact would be less than significant.

## Addendum Analysis

The General Plan goals and policies support reduction of impacts to public services and recreation facilities. Policies and actions in the General Plan included as mitigation in the General Plan EIR are implemented to help reduce impacts to the greatest extent possible. These policies and actions would be required with implementation of the Housing Element Update.

The Housing Element Update is a policy document consistent with the General Plan. The Housing Element Update includes housing sites located throughout the city that were evaluated previously for potential environmental impacts in the General Plan EIR. The Housing Element Update also includes ADUs as well as housing inventory sites consisting of vacant and non-vacant properties that could accommodate new or additional housing units. The 213 units that would be accommodated by the Housing Element Update would not exceed the 750 units included in the City’s buildout capacity estimated under the General Plan and analyzed in the General Plan EIR and can be accommodated within the existing city limits. Therefore no new or expanded public services would be required beyond those included in the buildout of the General Plan. Since the sites are already served by fire, police, and emergency services, housing that may be built on these sites would not create a substantial change from current conditions.

The Housing Element Update, in and of itself, does not include a specific project involving a new housing development, but puts forth goals and policies that support housing efforts in Sebastopol. Because it is a policy document, the Housing Element Update would not, in and of itself, result in impacts to public services. All future development consistent with the Housing Element Update would be required to comply with applicable regulations and requirements related to public services including the following policies and actions from the Sebastopol General Plan:

General Plan Element	Policies	Actions
Community Services and Facilities Element	CSF 1-1 through 1-7, CSF 1-12, CSF 2-1 through CSF 2-22, CSF 5-2, CSF 5-4 through 5-8, CSF 5-10, CSF 6-3, CSF 6-5, CSF 6-12, CSF 6-16	CSF-1a through 1i, CSF-2a through 2t, CSF-5a through 5m, CSF-6a, CSF-6b, CSF-6h, CSF-6j

Source: City of Sebastopol 2016a

## Conclusions

The adoption of the Housing Element Update does not involve changes to the current adopted land uses and the City’s RHNA does not exceed the buildout capacity specified in the General Plan EIR. The Housing Element Update would not result in impacts beyond those addressed or analyzed in the

General Plan EIR nor present new information that shows impacts would be more significant than those described in the General Plan EIR. Therefore, the General Plan EIR applies to the Housing Element Update and no additional environmental assessment of public services and recreation is required.

# 16 Recreation

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	Where was the Impact Analyzed in the EIR	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
				Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
Would adoption of the Housing Element Update:								
a. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	Less than significant	Policies: CSF 2-1 through CSF 2-22  Actions: CSF-2a through 2t	3.12-18 through 3.12-23	No	No	No	Yes	Yes
b. Include recreational facilities or requires the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	Less than significant	Policies: CSF 2-1 through CSF 2-22  Actions: CSF-2a through 2t	3.12-18 through 3.12-23	No	No	No	Yes	Yes



## General Plan EIR Recreation Findings

The General Plan EIR discusses recreational facilities in Section 3.12, *Public Services and Recreation*. The General Plan EIR determined that impacts to existing park and recreational facilities and the necessity for new and/or expanded recreational facilities would be less than significant with implementation of the General Plan policies and actions and no additional mitigation is necessary. The General Plan EIR also stated that as future parks and recreation projects are considered by the City, each project will be evaluated for conformance with the General Plan, Municipal Code, and other applicable regulations.

## Addendum Analysis

The 213 units that would be accommodated by the Housing Element Update would not exceed the 750 units included in the City’s buildout capacity estimated under the General Plan and analyzed in the General Plan EIR. The General Plan goals and policies support reduction of impacts to parks and recreation facilities. The General Plan requires five (5) acres for every 1,000 residents. Under the General Plan methodology, (which counts 100 percent of active park land, and 25 percent for open space parks), the city currently has a total ‘counted’ parkland of 46 acres. With 7,489 residents, the total parkland ratio is 6.14 acres for each 1,000 residents. Policies and actions in the General Plan included as mitigation in the General Plan EIR are implemented to help reduce impacts to the greatest extent possible, and impact fees are assessed to most new residential development (excluding units exempt under State Law from impact fees), which will allow the City to obtain and develop additional parkland as needed to accommodate new housing and associated population. These policies and actions would be required with implementation of the Housing Element Update.

The Housing Element Update is a policy document consistent with the General Plan. The Housing Element Update includes housing sites located throughout the city that were evaluated previously for potential environmental impacts in the General Plan EIR. The Housing Element Update also includes ADUs as well as housing inventory sites consisting of vacant and non-vacant properties that could accommodate new or additional housing units. Since non-vacant sites already contain some type of development, housing that may be built on these sites would not create a substantial change from current conditions. Similarly, most vacant sites are urban infill sites where development and infrastructure already exist throughout the area.

The Housing Element Update, in and of itself, does not include a specific project involving a new housing development, but puts forth goals and policies that support housing efforts in Sebastopol. Because it is a policy document, the Housing Element Update would not, in and of itself, result in impacts to recreation facilities. All future development consistent with the Housing Element Update would be required to comply with applicable regulations and requirements related to recreation including the following policies and actions from the Sebastopol General Plan:

General Plan Element	Policies	Actions
Community Services and Facilities Element	CSF 2-1 through CSF 2-22	CSF-2a through 2t

Source: City of Sebastopol 2016a

## **Conclusions**

The adoption of the Housing Element Update does not involve changes to the current adopted land uses and the City's RHNA does not exceed the buildout capacity specified in the General Plan EIR. The Housing Element Update would not result in impacts beyond those addressed or analyzed in the General Plan EIR nor present new information that shows impacts would be more significant than those described in the General Plan EIR. Therefore, the General Plan EIR applies to the Housing Element Update and no additional environmental assessment of recreation is required.

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# 17 Transportation

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	Where was the Impact Analyzed in the EIR	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
				Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
Would adoption of the Housing Element Update:								
a. Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	Significant and unavoidable	Policies: CIR 1-1, CIR 1-6, CIR 1-7, CIR 1-9, CIR 1-14, CIR 1-16, CIR 1-17, CIR 1-19, CIR 3-6, CIR 5-2  Actions: CIR-1a through 1d, CIR-1g, CIR-1i, CIR-1j, CIR-1m through 1o, CIR-3e, CIR-5b	3.13-20 through 3.13-26	No	No	No	Yes	Yes
b. Conflict or be inconsistent with CEQA Guidelines 15064.3, subdivision (b)?	N/A	N/A		N/A	N/A	N/A	N/A	N/A

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	Where was the Impact Analyzed in the EIR	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
				Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
c. Substantially increase hazards due to a geometric design feature or incompatible uses?	Less than significant	Policies: CIR 1-11, CIR 3-9, CIR 3-11  Actions: CIR-1k, CIR-3b, CIR-3c	3.13-27 through 3.13-28	No	No	No	Yes	Yes
d. Result in inadequate emergency access?	Less than significant	Policies: CIR 1-15, CIR 3-7  Actions: CIR-1f	3.13-28 through 3.13-29	No	No	No	Yes	Yes

## General Plan EIR Transportation Findings

The General Plan EIR analyzed Level of Service (LOS) instead of Vehicle Miles Traveled (VMT), and found that the intersection of McKinley Street/Laguna Park Way/Petaluma Avenue would operate at LOS F on the Laguna Park Way and McKinley Street stop-controlled approaches. It is recommended that a HAWK (High Intensity Activated Crosswalk) beacon be installed at the south leg crossing while also narrowing the northbound approach to one lane. Since there is no identified funding source for this improvement and the intersection is controlled by Caltrans, outside the control of the City of Sebastopol, this would be a significant and unavoidable impact.

The General Plan EIR found that the intersections of Sebastopol Avenue (SR 12)/Petaluma Avenue (SR 116) and Sebastopol Avenue (SR 12)/Morris Street would be expected to experience unacceptable LOS E to LOS F conditions during peak hours under General Plan growth conditions. Two mitigation options were presented, however, the impacts would remain significant and unavoidable even with mitigation.

The General Plan EIR does not address consistency with *CEQA Guidelines* Section 15064.3, subdivision (b), since the General Plan EIR was prepared and certified prior to the adoption of Senate Bill (SB) 743.

The General Plan EIR determined that development allowed under buildout of the Sebastopol General Plan would result in increased use of SR 12 and SR 116, regional highway facilities owned and operated by Caltrans that also serve local traffic within Sebastopol. The General Plan EIR analyzed the following unsignalized intersections projected to operate unacceptably in the future:

- Healdsburg Avenue (SR116) at Covert Lane
- Healdsburg Avenue (SR116) at Murphy Avenue
- Gravenstein Highway South (SR116) at Fircrest Avenue

The General Plan EIR found that the installation of traffic controls at these intersections would reduce the impacts to a less than significant level. However, because the City does not control the funding or timing of these improvements, the City cannot determine that the improvements will be made in time to accommodate regional and local growth, this impact would remain significant and unavoidable and no alternative mitigation is available.

The General Plan EIR determined that there would be no impact to air traffic patterns or applicable congestion management programs. Other impacts related to hazardous roadway design features, emergency access, and public transit were determined to be less than significant.

## Addendum Analysis

The General Plan goals and policies support reduction of impacts to transportation and traffic. Policies and actions in the General Plan included as mitigation in the General Plan EIR are implemented to help reduce impacts to the greatest extent possible. These policies and actions would be required with implementation of the Housing Element Update.

The Housing Element Update is a policy document consistent with the General Plan. The Housing Element Update includes housing sites located throughout the city that were evaluated previously for potential environmental impacts in the General Plan EIR. The Housing Element Update also includes ADUs as well as housing inventory sites consisting of vacant and non-vacant properties that could accommodate new or additional housing units. Since non-vacant sites already contain some

type of development, housing that may be built on these sites would not create a substantial change from current conditions. Similarly, most vacant sites are urban infill sites where development and infrastructure already exist throughout the area. The Housing Element Update, in and of itself, does not include a specific project involving a new housing development, but puts forth goals and policies that support housing efforts in Sebastopol. Because it is a policy document, the Housing Element Update would not, in and of itself, result in impacts to transportation and traffic.

By supporting urban infill, the Housing Element Update would encourage development in areas near transit, services, and jobs, which would reduce future residents’ reliance on single-occupancy vehicles and thereby reducing VMT. All future development consistent with the Housing Element Update would be required to comply with applicable regulations and requirements related to transportation including the following policies and actions from the Sebastopol General Plan:

General Plan Element	Policies	Actions
Circulation Element	CIR 1-1, CIR 1-6, CIR 1-7, CIR 1-9, CIR 1-11, CIR 1-14, CIR 1-15, CIR 1-16, CIR 1-17, CIR 1-19, CIR 3-6, CIR 3-7, CIR 3-9, CIR 3-11, CIR 5-2	CIR-1a through 1f, CIR-1g, CIR-1i, CIR-1j, CIR-1k, CIR-1m through 1o, CIR-3b, CIR-3c, CIR-3e, CIR-5b

Source: City of Sebastopol 2016a

## Conclusions

The adoption of the Housing Element Update does not involve changes to the current adopted land uses and the City’s RHNA does not exceed the buildout capacity specified in the General Plan EIR. The Housing Element Update would not result in impacts beyond those addressed or analyzed in the General Plan EIR nor present new information that shows impacts would be more significant than those described in the General Plan EIR. Therefore, the General Plan EIR applies to the Housing Element Update and no additional environmental assessment of transportation and traffic is required.

# 18 Tribal Cultural Resources

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	Where was the Impact Analyzed in the EIR	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
				Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
Would adoption of the Housing Element Update:								
a. Cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074 that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?	Less than Significant	Policies: COS 10-1 through 10-3, COS 10-5 through 10-6, COS 10-8, CD 3-1 through 3-6  Actions: COS-10a through 10c, COS-10e through 10f, COS-10h, CD-3a through 3b, CD-3e through 3i	3.5-9 through 3.5-10	No	No	No	Yes	Yes



EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	Where was the Impact Analyzed in the EIR	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162(a) Occur?	Project is within the Scope of General Plan EIR?
				Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
b. Cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074 that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1?	Less than Significant	Policies: COS 10-1 through 10-3, COS 10-5 through 10-6, COS 10-8, CD 3-1 through 3-6  Actions: COS-10a through 10c, COS-10e through 10f, COS-10h, CD-3a through 3b, CD-3e through 3i	3.5-9 through 3.5-10	No	No	No	Yes	Yes

## General Plan EIR Tribal Cultural Resource Findings

The General Plan EIR does not include a chapter or section dedicated to analysis of impacts to tribal cultural resources. However, it does analyze general impacts to historical and cultural resources (including archeological resources that may originate from Native American tribes) in Section 3.5, *Cultural Resources*, and concludes that impacts to historic and cultural resources would be less than significant.

Furthermore, as part of the outreach efforts associated with the General Plan Update, letters were sent to the following tribes and tribal contacts, in compliance with Senate Bill 18, to request information regarding the General Plan Area:

- The Native American Heritage Commission;
- Ms. Patricia Hermosillo, Chairperson, Cloverdale Rancheria of Pomo Indians;
- Mr. Mario Hermosillo, Jr., Tribal Environmental Planner, Cloverdale Rancheria of Pomo;
- Indians; Mr. Harvey Hopkins, Chairperson, Dry Creek Rancheria of Pomo Indians;
- Ms. Marjorie Mejia, Chairperson, Lytton Rancheria of California;
- Ms. Lisa Miller, Tribal Administrator, Lytton Rancheria of California;
- Mr. Emilio Valencia, Chairperson, Stewarts Point Rancheria;
- Ms. Nina Hapner, Environmental Planning Department, Stewarts Point Rancheria;
- Mr. Otis Parish, Tribal Historic Preservation Office, Stewarts Point Rancheria;
- Mr. Greg Sarris, Chairperson, The Federated Indians of Graton Rancheria; Mr. Gene Buvelot;
- The Federated Indians of Graton Rancheria;
- Ya-Ka-Ama; and
- Western Sonoma County Historical Society.

The Native American Heritage Commission responded with a letter dated February 21, 2014. On June 3, 2014, Mr. Otis Parish, Tribal Historic Preservation Office, Stewarts Point Rancheria, responded via email stating: “This letter constitutes our answer to your letter regarding The City of Sebastopol General Plan Study Area consultation. The City of Sebastopol is out of The Kashia Band of Pomo Indians of the Stewarts Point Rancheria’s aboriginal cultural area of concern. Thus, we have no interest.”

On January 12, 2016, the Sebastopol Planning Director and representatives from the General Plan Update consultant team met with representatives from the Federated Indians of the Graton Rancheria to discuss General Plan policies and local approaches towards the projection of cultural and historical resources within the Planning Area. No specific resources or previously unknown cultural or historical resources within the Planning Area were identified during the consultation meeting. As discussed in Section 3.5, *Cultural Resources*, of the General Plan EIR, the Sebastopol General Plan has been developed to include extensive policies and actions aimed at reducing potential impacts to cultural and historical resources, and the policies included in the General Plan were developed to be responsive and respectful of the concerns and priorities raised by the Federated Indians of the Graton Rancheria during consultation with the City.

## Addendum Analysis

As part of its tribal cultural resource identification process under SB 18, the City of Sebastopol sent letters regarding the Housing Element Update to 13 Native American tribe contacts that have requested notice of projects within the City’s jurisdiction on June 27, 2022. The Federated Indians of Graton Rancheria (FIGR) requested a consultation meeting, which took place on November 30, 2022. As of the drafting of this Addendum, consultation has not been completed. However, the City must complete consultation prior to adoption of the Housing Element.

During the 2016 consultation with representatives from the Federated Indians of the Graton Rancheria, no specific resources or previously unknown cultural or historical resources within the Planning Area were identified.

The General Plan goals and policies support reduction of impacts to tribal and cultural resources. Policies and actions in the General Plan included as mitigation in the General Plan EIR are implemented to help reduce impacts to the greatest extent possible. These policies and actions would be required with implementation of the Housing Element Update.

The Housing Element Update is a policy document consistent with the General Plan. The Housing Element Update includes housing sites located throughout the city that were evaluated previously for potential environmental impacts in the General Plan EIR. The Housing Element Update also includes ADUs as well as housing inventory sites consisting of vacant and non-vacant properties that could accommodate new or additional housing units. Since non-vacant sites already contain some type of development, housing that may be built on these sites would not create a substantial change from current conditions. Similarly, most vacant sites are urban infill sites where development and infrastructure already exist throughout the area. The Housing Element Update, in and of itself, does not include a specific project involving a new housing development, but puts forth goals and policies that support housing efforts in Sebastopol. Because it is a policy document, the Housing Element Update would not, in and of itself, result in impacts to tribal cultural resources.

All future development consistent with the Housing Element Update must comply with General Plan policies and programs that would minimize impacts to tribal and cultural resources and must comply with all applicable regulations regarding tribal cultural resources and the following policies and actions from the Sebastopol General Plan:

General Plan Element	Policies	Actions
Conservation and Open Space Element	COS 10-1 through 10-3, COS 10-5 through 10-6, COS 10-8	COS-2a, COS-10b through 10c, COS-10e through 10f, COS-10h
Community Design Element	CD 3-1 through 3-6	CD-2a, CD-3a through 3b, CD-3e through 3i

Source: City of Sebastopol 2016a

## Conclusions

The adoption of the Housing Element Update does not involve changes to the current adopted land uses and the City’s RHNA does not exceed the buildout capacity specified in the General Plan EIR. The Housing Element Update would not result in impacts beyond those addressed or analyzed in the General Plan EIR nor present new information that shows impacts would be more significant than those described in the General Plan EIR. Therefore, the General Plan EIR applies to the Housing Element Update and no additional environmental assessment of tribal cultural resources is required.

# 19 Utilities and Service Systems

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	Where was the Impact Analyzed in the EIR	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
				Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
Would adoption of the Housing Element Update:								
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	Less than significant	Policies: CSF 3-1 through 3-10, CSF 4-2 through 4-4, CSF 4-6 through 4-8  Actions: CSF-3a through 3j, CSF-4a through 4f, CSF-4h	3.14-18 through 3.14-19 (water) 3.14-30 through 3.14-32 (wastewater)	No	No	No	Yes	Yes

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	Where was the Impact Analyzed in the EIR	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
				Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	Less than significant	Policies: CSF 3-1 through 3-10 Actions: CSF-3a through 3j	3.14-14 through 3.14-17	No	No	No	Yes	Yes
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	Significant and Unavoidable	Policies: CSF 4-1 through 4-10 Actions: CSF-4a through 4h	3.14-27 through 3.14-30	No	No	No	Yes	Yes

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	Where was the Impact Analyzed in the EIR	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162(a) Occur?	Project is within the Scope of General Plan EIR?
				Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	Less than significant	Policies: COS 9-12, COS 9-13 Actions: COS-9h through 9j	3.14-39 through 3.14-40	No	No	No	Yes	Yes
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	Less than significant	Policies: COS 9-12, COS 9-13 Actions: COS-9h through 9j	3.14-39 through 3.14-40	No	No	No	Yes	Yes

## General Plan EIR Utilities and Service Systems Findings

The General Plan EIR determined that the potential to exceed wastewater treatment capacity would be significant and unavoidable. The General Plan policies and actions would assist in reducing wastewater generation flows to the greatest extent feasible and would ensure that new development is not approved until it can be demonstrated that wastewater treatment capacity exists to meet new and existing development demands. At the time of preparation of the General Plan EIR, an increase in permitted capacity cannot be guaranteed. Therefore, this impact would be significant and unavoidable under cumulative buildout conditions.

The General Plan EIR found that other impacts to utilities and service systems are less than significant including environmental impacts from the construction or expansion of water and wastewater treatment facilities and ensuring that adequate water supplies are available to serve new growth projected under the General Plan.

## Addendum Analysis

The General Plan goals and policies support reduction of impacts to utilities and service systems. Policies and actions in the General Plan included as mitigation in the General Plan EIR are implemented to help reduce impacts to utilities and service system to the greatest extent possible. These policies and actions would be required with implementation of the Housing Element Update.

The Housing Element Update is a policy document consistent with the General Plan. The Housing Element Update includes housing sites located throughout the city that were evaluated previously for potential environmental impacts in the General Plan EIR. The Housing Element Update also includes ADUs as well as housing inventory sites consisting of vacant and non-vacant properties that could accommodate new or additional housing units. Since non-vacant sites already contain some type of development, housing that may be built on these sites would not create a substantial change from current conditions. Similarly, most vacant sites are urban infill sites where development and infrastructure for utilities already exists throughout the city. The Housing Element Update, in and of itself, does not include a specific project involving a new housing development, but puts forth goals and policies that support housing efforts in Sebastopol. Because it is a policy document, the Housing Element Update would not, in and of itself, result in impacts to utilities and service systems. All future development consistent with the Housing Element Update would be subject to adopted development guidelines and other regulatory requirements concerning water, wastewater, storm drains, solid waste, and other infrastructure; water supply; and wastewater treatment systems including the following policies and actions from the Sebastopol General Plan:

General Plan Element	Policies	Actions
Conservation and Open Space Element	COS 9-12, COS 9-13	COS-9h through 9j
Community Services and Facilities Element	CSF 3-1 through 3-10 CSF 4-1 through 4-10	CSF-3a through 3j CSF-4a through 4h

Source: City of Sebastopol 2016a

## **Conclusions**

The adoption of the Housing Element Update does not involve changes to the current adopted land uses and the City's RHNA does not exceed the buildout capacity specified in the General Plan EIR. The Housing Element Update would not result in impacts beyond those addressed or analyzed in the General Plan EIR nor present new information that shows impacts would be more significant than those described in the General Plan EIR. Therefore, the General Plan EIR applies to the Housing Element Update and no additional environmental assessment of utilities and service systems is required.



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# 20 Wildfire

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	Where was the Impact Analyzed in the EIR	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
				Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
Would adoption of the Housing Element Update:								
a. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, substantially impair an adopted emergency response plan or emergency evacuation plan?	No Impact	None	3.8-8 and 3.8-26 through 3.8-29	No	No	No	Yes	Yes
b. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant	No Impact	None	3.8-8 and 3.8-26 through 3.8-29	No	No	No	Yes	Yes

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	Where was the Impact Analyzed in the EIR	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162(a) Occur?	Project is within the Scope of General Plan EIR?
				Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
concentrations from a wildfire or the uncontrolled spread of a wildfire?								
c. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	No Impact	None	3.8-8 and 3.8-26 through 3.8-29	No	No	No	Yes	Yes

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	Where was the Impact Analyzed in the EIR	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 (a) Occur?	Project is within the Scope of General Plan EIR?
				Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
d. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	No Impact	None	3.8-8	No	No	No	Yes	Yes

## General Plan EIR Wildfire Findings

The General Plan EIR discusses wildfire in Section 3.8, *Hazards*. At the time the General Plan EIR was prepared, there were no adopted thresholds for wildfire impacts under CEQA.

The General Plan EIR determined that the City of Sebastopol is not categorized as a "Very High" Fire Hazard Severity Zone (FHSZ) by CalFire. The closest "Very High" FHSZ is located north of SR 116 in Guerneville, approximately 9 miles north of city limits. State Responsibility Areas within the vicinity of Sebastopol are primarily found to the south and west of the city limits. Approximately 4 miles to the west of the city limits is a combination of "Moderate" and "High" FHSZs. Additionally, there are some parcels within city limits in the 'moderate' FHSZ; these parcels are all near the city limit lines. This area is generally rolling to steep slopes with increased vegetation. There are no Federal Responsibility Areas within the vicinity of City of Sebastopol.

## Addendum Analysis

The General Plan goals and policies support reduction of impacts to wildfire. Policies and actions in the General Plan included as mitigation in the General Plan EIR are implemented to help reduce impacts to the greatest extent possible. These policies and actions would remain in practice with implementation of the Housing Element Update.

The Housing Element Update is a policy document consistent with the General Plan. The Housing Element Update includes housing sites located throughout the city that were evaluated previously for potential environmental impacts in the General Plan EIR. The Housing Opportunity Sites included in the Housing Element Update remain approximately 9 miles from a "Very High" FHSZ and impacts regarding wildfire would not change significantly from current conditions. No housing sites within the "moderate" FHSZ zones are included in the housing site inventory. The Housing Element Update, in and of itself, does not include a specific project involving a new housing development, but puts forth goals and policies that support housing efforts in Sebastopol. Because it is a policy document, the Housing Element Update would not, in and of itself, result in impacts to wildfire. All future development consistent with the Housing Element Update would be required to comply with applicable regulations and requirements related to wildfire.

## Conclusions

The adoption of the Housing Element Update does not involve changes to the current adopted land uses and the City's RHNA does not exceed the buildout capacity specified in the General Plan EIR. The Housing Element Update would not result in impacts beyond those addressed or analyzed in the General Plan EIR nor present new information that shows impacts would be more significant than those described in the General Plan EIR. Therefore, the General Plan EIR applies to the Housing Element Update and no additional environmental assessment of wildfire is required.

## 7 Summary of Findings

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The Housing Element Update is part of the City's General Plan, and like other elements within the General Plan, it includes goals and policies that the City should meet when it comes to the planning of housing. The Housing Element is also unique from the other elements within the General Plan because it is required to be periodically updated to align with the State's allocation of the RHNA. Also, the Housing Element includes Housing Programs that are required to be implemented within the planning period established for the Housing Element. These programs are usually implemented over time after the element is adopted.

The Housing Element Update does not involve site-specific projects nor changes in the currently adopted General Plan land uses, therefore the adoption of the Housing Element would be consistent with the General Plan EIR certified in November 2016. The General Plan EIR analyzed full buildout of the City's General Plan. Future development facilitated by the Housing Element would be subject to applicable development standards and reviews established by City ordinances. Additionally, future development requiring discretionary review may be subject to CEQA compliance if it is not consistent with the General Plan or Housing Element.

It has been determined through this analysis that the adoption of the Housing Element Update would not result in impacts beyond those addressed or analyzed in the General Plan EIR, nor does the Housing Element Update present new information that shows impacts would be more significant than those described in the General Plan EIR. Therefore, the General Plan EIR applies to the Housing Element Update and no additional environmental compliance is required.

The analysis pursuant to Section 15162 demonstrates whether the lead agency can approve the activity as being within the scope of the existing certified EIR, that an addendum to the existing EIR would be appropriate, and no new environmental document, such as a new EIR, would be required. The addendum need not be circulated for public review but can be included in or attached to the final EIR, and the decision-making body shall consider the addendum with the final EIR prior to deciding on the project.

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## 8 References

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### 8.2 List of Preparers

Rincon Consultants, Inc. prepared this EIR Addendum under contract to the City of Sebastopol. Persons involved in data gathering analysis, project management, and quality control are listed below.

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