

ADDENDUM TO THE GENERAL PLAN EIR

FOR THE CITY OF SANTA ROSA HOUSING ELEMENT UPDATE

I. INTRODUCTION

This document serves as the environmental documentation for the City of Santa Rosa's proposed Housing Element update. This addendum to the City of Santa Rosa General Plan 2035 Environmental Impact Report (EIR) (State Clearinghouse Number 2008092114) demonstrates that the analysis contained in that EIR adequately addresses the potential physical impacts associated with implementation of the City's Housing Element update and that none of the conditions described in California Environmental Quality Act (CEQA) Guidelines Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred. The General Plan includes land uses for residential development and the EIR analyzed the potential footprint effects of the development of those units and the demand for services and utilities that the additional population would generate. The EIR analyzed effects related to the location and intensity of the development of approximately 23,770 housing units in the urban growth boundary, which would increase the city's housing supply to a total of 94,840 housing units at build out. The proposed Housing Element update states that there is enough vacant land within the city limits to accommodate over 13,000 units at all affordability levels. Therefore, the housing assumptions in the Housing Element would not exceed the assumptions for residential development in the General Plan EIR and no changes to the EIR would be required, as discussed below.

State law requires every jurisdiction in California to adopt a comprehensive, long-term general plan to guide its physical development; the housing element is one of seven mandated elements of the general plan. California housing element law requires that each city and county develop local housing programs to meet its "fair share" of existing and future housing needs for all income groups. The Association of Bay Area Governments (ABAG) is responsible for developing and assigning these regional needs, or Regional Housing Needs Allocations (RHNA), to the jurisdictions in the greater Bay Area region. Consistent with the current RHNA planning period, the proposed Santa Rosa Housing Element is an eight-year plan extending from 2014 to 2022. California Government Code Section 65583(a)(7) requires "an assessment of housing needs and an inventory of resources and constraints relevant to the meeting of these needs." A housing element does not propose development of any residential uses, but serves as a planning document that establishes goals, policies, and objectives relative to the provision of housing needs for all income levels and identifies sites where existing zoning allows residential development. In some jurisdictions, additional land could need to be designated or zoned for residential development to accommodate that jurisdiction's fair share of housing. As discussed below, the City of Santa Rosa has adequate land zoned for residential development to accommodate the City's RHNA, so no changes to the zoning of any land are needed to accommodate Santa Rosa's RHNA.

II. BACKGROUND

The City of Santa Rosa adopted the Santa Rosa General Plan 2035 and certified the General Plan Environmental Impact Report in November 2009. The General Plan 2035 is a comprehensive update, addressing land use and livability, urban design, housing, transportation, public services and facilities, open space and conservation, growth management, youth and family, economic vitality, historic preservation, noise and safety, and art and culture. The General Plan is intended to guide development in Santa Rosa through 2035.

The General Plan EIR is a program EIR that analyzes the possible impacts that could occur under implementation of the General Plan. The General Plan EIR addressed the following issue areas: land use consistency and compatibility; population, housing, and employment; transportation and circulation; air quality and climate change; noise; biological resources; utilities and service systems; hydrology and water quality; public services; cultural resources; visual quality; open space and agriculture; geology, soils, and seismicity; hazards and hazardous materials; energy; and parks and recreation.

In 2012, the City prepared a General Plan Amendment and Climate Action Plan with the intent to reduce greenhouse gas emissions within the City's Urban Growth Boundary. The General Plan Amendment included new and revised text and policies aimed at reducing greenhouse gas emissions. The Climate Action Plan is an implementation tool that contains reduction measures that focus on attaining the various goals and policies of the General Plan relative to GHG emissions. The City prepared an EIR that supplemented information from the General Plan EIR. The Supplemental Environmental Impact Report for the General Plan Amendment and Climate Action Plan (State Clearinghouse Number 2011092010) was certified in 2012. While the General Plan Amendment and Climate Action Plan Project did not alter the development assumptions contained in the General Plan EIR, or change assumptions regarding the location of development within the City, it is expected that implementation of the Plan will reduce greenhouse gas emissions in Santa Rosa, especially by ensuring that new development incorporates specific features identified in the New Development Checklist (Appendix E).

III. PROJECT DESCRIPTION

The purpose of the Housing Element is to identify existing and projected housing needs within the community and to set forth policies that promote preservation, improvement, and development of diverse types and costs of housing throughout Santa Rosa. The proposed Housing Element establishes goals, policies, and objectives relative to the provision of housing for all income levels and identifies sites where existing zoning allows residential development at densities to meet the housing needs. The Housing Element does not propose development of any residential uses. As discussed below, the sites identified in the proposed Housing Element to accommodate the development of residential units in the City's RHNA have already been assumed for development in the General Plan and the General Plan EIR.

The proposed Housing Element covering the period from 2014 through 2022 was prepared in compliance with California general plan law pertaining to housing elements. **Table 1** provides the RHNA target for the City of Santa Rosa for the planning period 2014–2022 for each of the five household income groups.

TABLE 1: REGIONAL HOUSING NEEDS ALLOCATION, 2014–2022

Income Category	Housing Need
Extremely Low*	473
Very Low	474
Low	581
Moderate	759
Above Moderate	2,375
Total Projected Need	4,662

Average Annual Need	548
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Source: ABAG Regional Housing Needs Allocation, July 2013

* The ABAG RHNA did not include a specific need for units affordable to extremely low-income households; this is estimated at 50% of the need projected for very low-income households (947 units).

IV. LEGAL STANDARDS

California Environmental Quality Act (CEQA) Guidelines Section 15162 specifies the type of documentation required when changes are proposed to a project. CEQA Guidelines Section 15162 states:

- (a) *When an EIR has been certified or a negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:*
 - (1) *Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;*
 - (2) *Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or*
 - (3) *New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:*
 - (A) *The project will have one or more significant effects not discussed in the previous EIR or negative declaration;*
 - (B) *Significant effects previously examined will be substantially more severe than shown in the previous EIR;*
 - (C) *Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or*
 - (D) *Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.*
- (b) *If changes to a project or its circumstances occur or new information becomes available after adoption of a negative declaration, the lead agency shall prepare a subsequent EIR if required under subdivision (a). Otherwise the lead agency shall*

determine whether to prepare a subsequent negative declaration, an addendum, or no further documentation.

- (c) Once a project has been approved, the lead agency's role in project approval is completed, unless further discretionary approval on that project is required. Information appearing after an approval does not require reopening of that approval. If after the project is approved, any of the conditions described in subdivision (a) occurs, a subsequent EIR or negative declaration shall only be prepared by the public agency which grants the next discretionary approval for the project, if any. In this situation no other responsible agency shall grant an approval for the project until the subsequent EIR has been certified or subsequent negative declaration adopted.*
- (d) A subsequent EIR or subsequent negative declaration shall be given the same notice and public review as required under Section 15087 or Section 15072. A subsequent EIR or negative declaration shall state where the previous document is available and can be reviewed.*

Section 15164 of the CEQA Guidelines includes situations when a subsequent or supplemental EIR is not required. CEQA Guidelines Section 15164 states:

- (a) The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.*
- (b) An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.*
- (c) An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration.*
- (d) The decision making body shall consider the addendum with the final EIR or adopted negative declaration prior to making a decision on the project.*
- (e) A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.*

V. ANALYSIS

The General Plan EIR analyzed the potential environmental impacts associated with the development of approximately 23,770 new housing units within the city's Urban Growth Boundary by 2035 (General Plan EIR p. 4B-6).

Table 2 (Table 4-34 in the proposed Housing Element) demonstrates Santa Rosa's ability to accommodate the development of affordable housing included in the RHNA and in fact, shows that there would be a surplus of available residential land. According to the proposed Housing Element, the city has enough vacant land to accommodate the development of 13,080 new

housing units within the urban growth boundary. An additional 829 units affordable to lower-income households could also be provided on underutilized sites located throughout the City. Currently (2014), five multi-family housing projects in the City have been approved but not yet constructed that can be applied to the RHNA. Those projects would result in the development of 196 units affordable to extremely low- and very low-income households, and another 326 units affordable to moderate- and above moderate-income households.

No zoning changes are proposed in the Housing Element to accommodate the development of this housing. The proposed Housing Element states that an additional 7,601 housing units could be developed outside of the existing city boundary within the City's Urban Growth Boundary. Of this development potential, 653 housing units could be developed in land use designations that typically accommodate affordable housing, including Transit Village Medium (TVM), Transit Village Mixed Use (TVMX), and Medium High Density (MHD). Note that while the potential units in the UGB but not currently within city limits are not counted toward meeting the RHNA in the proposed Housing Element, the General Plan EIR did consider effects of development of units in the UGB.

TABLE 2: SUMMARY OF CAPACITY TO MEET THE RHNA (2014-2022)

	Extremely Low Very Low	Low	Moderate	Above Moderate	Total
RHNA	947	581	759	2,375	4,662
Units in approved multifamily projects (see Housing Element Table 4-35) ¹	196		326		522
Vacant land (see Tables 4-36 and 4-38, and Tables 4-40 to 4-51 in the Housing Element appendix) ²	1,516		11,563		13,080
Underutilized sites (see Table 4-52 in the Housing Element appendix) ³	829		—		829
Remaining RHNA (surplus capacity)	(1,013)		(8,755)		(9,769)

Source: City of Santa Rosa Community Development Department 2014

1. The 196 units in approved multifamily projects are units that are planned within affordable projects with income restrictions. These projects are Catalina Townhomes, Lantana Place, and Tierra Springs Family Apartments.

2. For purposes of this analysis, sites in the MHD, TVM, and TVMX land use categories are assumed to be appropriate for lower-income development and capacity on all other sites is assumed to be appropriate for moderate- or above moderate-income housing. Affordable development is allowed and encouraged on sites in all land use categories.

3. Identified underutilized sites allow densities of 30 to 40 units per acre. Based on allowed/anticipated densities, these sites are considered to be appropriate for the development of lower-income housing for purposes of this analysis.

Note that the above table cross-references refer to the Housing Element.

As discussed above, the General Plan provides enough vacant residentially zoned land to accommodate the development of approximately 23,770 housing units affordable to all income levels. According to the proposed Housing Element, as of 2013, there were 67,906 housing units in the City, which represents an increase of 2,858 units over the 2008 housing unit estimate used in the General Plan EIR. Based on this, the City can still accommodate the development of 20,912 additional housing units under the current General Plan and General Plan EIR.

It should also be noted that, subsequent to adoption of the General Plan and certification of the General Plan EIR, the City adopted the North Santa Rosa Station Area Specific Plan. The North Santa Rosa Station Area Specific Plan Environmental Impact Report (State Clearinghouse Number 2011122034) analyzed an increase of approximately 1,714 dwelling units (438 single-

family units, 1,276 multi-family units) beyond that analyzed under buildout of the General Plan. These units would provide additional capacity beyond that noted above, raising the surplus capacity to 11,483 housing units.

Consequently, buildout of the land uses in the General Plan and analyzed in the General Plan EIR, including housing units to satisfy the RHNA, have been adequately analyzed and no further environmental analysis is required. No changes in land use designation or zoning are required for the City to accommodate development of affordable housing in excess of the RHNA.

VI. CONCLUSION

The City of Santa Rosa, acting as the lead agency, determined that the proposed Housing Element would not require major revisions to the adopted General Plan or its associated EIR because there are no new significant environmental effects or substantial increases in the severity of significant effects beyond those previously identified as part of the City's environmental review process.

The Housing Element would not require the designation of additional residential land for development or the expansion of services beyond that needed to accommodate the level of growth evaluated in the General Plan EIR. Because the development of residential uses has been fully analyzed in the General Plan EIR, and the provision of adequate infrastructure and services to serve that growth was anticipated in the General Plan and was also fully analyzed in the EIR, the units assumed in the proposed Housing Element are within the development potential envisioned in the General Plan and analyzed in the General Plan EIR. No additional analysis is required.