

January 2023 | General Plan EIR Addendum

ADDENDUM TO THE GENERAL PLAN EIR
SCH No. 2001082030
FOR THE
2023–2031 HOUSING ELEMENT UPDATE
City of Santa Rosa

Prepared for:

City of Santa Rosa

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1. Addendum to the Adopted General Plan EIR

1.1 BACKGROUND

The proposed 2023–2031 Housing Element (proposed project) will replace the existing 2015–2023 Housing Element and serve as Santa Rosa’s (City’s) guiding policy document that meets future needs of housing for all the City’s economic levels. The Housing Element is one of nine elements of the City’s General Plan.

The General Plan is the foundation development policy document of the City of Santa Rosa. It defines the framework by which the physical, economic, and human resources of the City are to be managed and used over time. The General Plan acts to clarify and articulate the intentions of the City with respect to the rights and expectations of the public, property owners, and prospective investors and business interests. The General Plan informs these citizens of the goals, objectives, policies, and standards for development of the City and the responsibilities of all sectors in meeting these. While the General Plan Environmental Impact Report (EIR) did not specifically address the 2023–2031 Housing Element, the policies in the General Plan address all physical impacts resulting from development in Santa Rosa consistent with the General Plan.

As a policy document, the Housing Element does not result in physical changes to the environment but encourages the development of housing at all income levels within the residential designations shown in the Land Use Element of the General Plan. None of the policies in the proposed project would change the existing land use pattern, as established by the General Plan and evaluated in the General Plan EIR. All future construction within the city must comply with the General Plan, zoning ordinance, state and federal regulations, and local development standards. In addition, future discretionary actions (i.e., use permits, design review) require independent and project-specific environmental review to comply with the California Environmental Quality Act (CEQA).

This document serves as the environmental documentation for adoption of the City’s proposed 2023–2031 Housing Element update. This addendum to the City of Santa Rosa’s General Plan EIR (certified in May 2009; State Clearinghouse Number 2008092114) demonstrates that the analysis in the General Plan EIR adequately addresses the potential physical impacts associated with housing built consistent with the Land Use Element of the General Plan. As the proposed project does not change any land use designations implementation of the proposed project would not trigger any of the conditions described in CEQA Guidelines Section 15162 calling for the preparation of a subsequent EIR or negative declaration.

1.2 GENERAL PLAN EIR

The General Plan EIR addresses potentially significant impacts related to 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 resources; open space and agriculture; geology, soils, and seismicity; hazards and hazardous materials; energy; and parks and recreation. The mitigation measures from the General Plan EIR

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reduce significant impacts to a less than significant level for the following environmental topic areas: air quality and climate change, and biological resources.

The General Plan EIR determined that implementation of the General Plan would result in significant and unavoidable impacts related to the following environmental topics:

- Transportation and Circulation
 - C-1: Implementation of the proposed Santa Rosa General Plan 2035 would result in increased traffic volumes, delay, and a decrease in level of service (LOS) on area intersections during the peak hours.
 - C-6: Implementation of the proposed Santa Rosa General Plan 2035 would result in increased motor vehicle traffic, which would contribute to an unacceptable LOS on Highway 101.
- Air Quality and Climate Change
 - D-1: New development under the proposed Santa Rosa General Plan 2035 could increase population and vehicle miles traveled (VMT) in the area at a rate greater than that assumed in regional air quality planning and therefore conflict with the implementation of the Bay Area Ozone Strategy.
 - D-5: The proposed Santa Rosa General Plan 2035 could conflict with implementation of state or local goals for reducing greenhouse gas emissions or generate greenhouse gas emissions (directly or indirectly) that would exceed any applicable threshold of significance and thereby have a negative effect on global climate change.
 - D-6: Implementation of the proposed Santa Rosa General Plan 2035, along with other foreseeable development in the vicinity, would not be consistent with the 2005 Bay Area Ozone Strategy and would result in a cumulative air quality impact.

1.3 PROJECT SUMMARY

CEQA requires the City to evaluate the environmental impacts associated with physical changes to the environment. In this instance, most of the goals, policies, and programs from the previous Housing Element are continued through to the proposed 2023–2031 Housing Element. Table 1-1 identifies the changes in goals or policies between the existing 2015–2023 Housing Element and the proposed 2023–2031 Housing Element.

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

	Existing Program	Implementation Status	Revision to Existing Program
H-A-1	Ensure adequate sites are available for development of a variety of housing types for all income levels, including single and multifamily units, mobile homes, transitional housing, and homeless shelters.	The City has ensured adequate sites are available for development of a variety of housing types for all income levels, including single- and multifamily units, mobile homes, transitional housing, and homeless shelters. The 2014 Housing Element identified vacant parcels available for construction of residential units at various densities. In addition, subsequent rezones in the SMART station areas have increased the number of sites zoned for high-density and residential housing. The City Council adopted an updated Downtown Station Area Specific Plan in October 2020 that offers strategies designed to encourage density and increase housing production for all income levels. The City is currently updating its General Plan, which will update the inventory of vacant parcels and explore density increases within appropriate areas.	Combine with Program H-F-8, modify and continue as new Program H-1.
H-A-2	Pursue the goal of meeting Santa Rosa's housing needs through increased densities, when consistent with preservation of existing neighborhoods. The number of affordable units permitted each year and the adequacy of higher density sites shall be reported as part of the General Plan Annual Review report.	The City continues to pursue its goal of meeting housing needs through increased densities when consistent with preservation of existing neighborhoods. An updated Density Bonus Ordinance was adopted in January 2019. This ordinance allows density increases citywide up to 35%, and up to 100% within the Downtown and North Station Area Specific Plan areas. The updated Downtown Station Area Specific Plan, adopted in 2020, allows for increased residential densities.	Delete. Increased density is not needed to meet the City's RHNA. The City does continue to promote development through additional programs in the Housing Element.
H-A-3	Promote conservation and rehabilitation of the existing housing stock and discourage intrusion of incompatible uses into residential neighborhoods which would erode the character of established neighborhoods or lead to use conflicts.	The City continues to improve the living conditions in the city's neighborhoods through active code enforcement and the Neighborhood Revitalization Program.	Combine with Programs H-B-1, H-B-4, and H-B-9, modify, and continue as new Programs H-8A and H-9.

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Existing Program	Implementation Status	Revision to Existing Program
	From 2015 to present, 570 residential units were rehabilitated through the ongoing administration of the Neighborhood Revitalization Program. To assist low-income renters with disabilities, the City continued to offer the Housing Accessibility Modification Grant Program and provided the following grants for accessibility improvements: 2018: \$7,588 for improvements for one household 2019: \$15,000 for improvements for three households 2020: \$3,000 for improvements for two households To ensure that building code standards for existing plumbing, electrical, and other aspects of homes were maintained, the City continued to conduct inspections. As a result of the inspections, homes were rehabilitated, including: 183 units in 2018 1,436 units in 2019 131 units in 2020 As a result of the Housing Quality Standards Inspection requirements of the HCV Rental Assistance Program, homes were rehabilitated, including: 173 units in 2018 211 units in 2019 121 between January and April in 2020 COVID waivers in place April 2020 – September 2021 108 units between October 2021 and December 2021	
H-A-4	Meet and confer with Sonoma County Planning staff on a regular basis to address housing needs of lower income and special needs groups, to coordinate regarding issues including infrastructure, zoning and land	The City continues to meet and confer with Sonoma County Planning staff on a regular basis to address housing needs of lower-income and special-needs groups, to coordinate regarding issues including infrastructure, zoning and land use, annexations, community acceptance strategies, homeless shelters, farmworkers, Delete. The City meets with Sonoma County Staff regularly to coordinate regional efforts. Regional efforts will be addressed

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Existing Program	Implementation Status	Revision to Existing Program
use, annexations, community acceptance strategies, homeless shelters, farmworkers, persons with disabilities, environmental issues, funding, and impact fees.	persons with disabilities, environmental issues, funding, and impact fees. Santa Rosa planners attend monthly Planning Advisory Committee (PAC) meetings, made up of Planning staff from each of the nine cities within the county and from the County of Sonoma, to collaborate on state legislation related to housing and work with Sonoma County planners on annexation initiatives. In addition, City and County planning staff meet as needed to discuss housing needs regionally. In the wake of the October 2017 wildfires, planning staff across the county have been meeting regularly to address the housing crises on a regional level. As a result of those conversations, the City has secured funding from two state programs and a direct allocation from the State to support the city’s recovery. The City received approximately \$38.5 million in Community Development Block Grant - Disaster Recovery (CDGB-DR) program funds to provide loans to affordable housing developers to create new affordable housing. Five developments were identified to receive CDBG-DR funding and are in various states of review and approval with HCD. The five projects are anticipated to create 377 new units of affordable housing in Santa Rosa by April 2024. The City Council authorized \$10 million from the PG&E settlement monies stemming from the Tubbs fire lawsuit towards affordable housing to be administered by the Renewal Enterprise District (RED). The City's contribution was matched by a \$10 million contribution from the County of Sonoma. On September 26, 2018, the City received a \$1.2 million award of CalHome Disaster Assistance (Wildfire Recovery) from HCD. The program funds were for disaster-related owner-occupied	through additional Housing Element programs.

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	Existing Program	Implementation Status	Revision to Existing Program
		rehabilitation activities that were directly impacted by the October 2017 wildfires. Unfortunately, this resulted in only 1 successful participant.	
H-A-5	Improve community acceptance of higher density housing through community based outreach, recognition of existing livable neighborhoods, and assurance of well-designed high density projects.	The City continues to improve community acceptance of higher-density housing through community based outreach, recognition of existing livable neighborhoods, and assurance of well-designed high-density projects. This policy is implemented on a project-by-project basis. The Planning staff continued to hold neighborhood meetings to raise public awareness of proposed projects, and to provide opportunities for increased transparency and input. In 2020, Planning staff continued to hold neighborhood meetings, pivoting to a virtual format in response to the COVID-19 pandemic, to raise public awareness of proposed projects, to ensure transparency, and to receive public input. Additionally, projects that used the City's Pre-Application Meetings and/or Concept Design Review benefitted from early feedback regarding the project design. Community discussions around increasing residential densities in the downtown core continued as part of the Downtown Station Area Specific Plan update process prior to it being adopted in October 2020.	Continue as Program H-28.
H-B-1	Rehabilitate 50 housing units annually through the city's rehabilitation programs, focusing on very low- and low-income beneficiaries.	The City continues to improve the living conditions in the city's neighborhoods through active code enforcement and the Neighborhood Revitalization Program. From 2015 to present, 570 residential units were rehabilitated through the ongoing administration of the Neighborhood Revitalization Program.	Combine with Programs H-A-3, H-B-4, and H-B-9 modify, and continue as new Programs H-8A and H-12.

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	To assist low-income renters with disabilities, the City continued to offer the Housing Accessibility Modification Grant Program and provided the following grants for accessibility improvements: 2018: \$7,588 for improvements for one household 2019: \$15,000 for improvements for three households 2020: \$3,000 for improvements for two households To ensure that building code standards for existing plumbing, electrical, and other aspects of homes were maintained, the City continued to conduct inspections. As a result of the inspections performed by the City's Code Enforcement Team, homes were rehabilitated, including: 2018: 183 units 1,436 units in 2019 131 units in 2020 As a result of the Housing Quality Standards Inspection requirements of the HCV Rental Assistance Program, more than 500 homes were rehabilitated, including: 173 units in 2018 211 units in 2019 121 units between January and April 2020 COVID-19 inspection waivers were in place April 2020 – September 2021 108 units between October 2021 and December 2021	
H-B-2	Discourage the subdivision of mobile home parks or conversion to other uses through enforcement of the Conversion of Mobile home Parks chapter of the City Code.	The implementation of the City's Mobile Home Parks Conversion ordinance is conducted on a project-by-project basis. The City continues to discourage the subdivision of mobile home parks or Modify and continue as new Program H-13.

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	Existing Program	Implementation Status	Revision to Existing Program
		conversion to other uses through enforcement of the Conversion of Mobile Home Parks chapter of the City Code.	
H-B-3	Retain federal, state and locally subsidized affordable units which may be lost through contract termination.	The City continues to retain federal, state, and locally subsidized affordable units that may be lost through contract termination. Through various City programs, 460 affordable units have been preserved since 2009. Opportunities are evaluated annually. During the planning period, no locally funded affordable units were lost to market rate.	Modify and continue as new Program H-15.
H-B-4	Continue improving living conditions in the city's neighborhoods through active code enforcement and the Neighborhood Revitalization Program.	The City continues to improve the living conditions in the city's neighborhoods through active code enforcement and the Neighborhood Revitalization Program. From 2015 to present, 570 residential units were rehabilitated through the ongoing administration of the Neighborhood Revitalization Program. To assist low-income renters with disabilities, the City continued to offer the Housing Accessibility Modification Grant Program and provided the following grants for accessibility improvements: 2018: \$7,588 for one household 2019: \$15,000 for three households 2020: \$3,000 for two households To ensure that building code standards for existing plumbing, electrical, and other aspects of homes were maintained, the City continued to conduct inspections. As a result of the inspections performed by the City's Code Enforcement Team, homes were rehabilitated, including: 183 units in 2018 1,436 units in 2019 131 units in 2020.	Combine with Programs H-A-3, H-B-1, and H-B-9 modify, and continue as new Programs H-10 and H-9.

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		As a result of the Housing Quality Standards Inspection requirements of the HCV Rental Assistance Program, homes were rehabilitated, including: 171 units in 2018 126 units in 2019 144 between January and March in 2020 As a result of COVID-19, Housing Quality Standards Inspections were suspended in March 2020. HCV assisted units resumed inspection in October 2021 and HOME-funded units resumed inspections in February 2022.	
H-B-5	Revise the Condominium Conversion Ordinance to preserve rental apartments from conversion to ownership units.	The existing Condominium Conversion Ordinance has not been revised; however, the City has not received any applications or inquiries related to condominium conversions since the 2014 General Plan Housing Element update.	Delete. The City does not receive applications for condominium conversions.
H-B-6	Administer the federal Section 8 Housing Choice Voucher rental assistance program.	The Housing Authority continues to administer the Housing Choice Voucher program aiding over 2,000 households.	Modify and continue as new Program H-36
H-B-7	Continue to designate a portion of the Real Property Transfer Tax, through annual budget appropriations, to affordable housing programs.	The Department of Housing and Community Services (HCS) continues to use a portion of the Real Property Transfer Tax (RPTT) for affordable housing citywide. Between 2015 and early 2022, \$1,606,710 of Real Property Transfer Tax revenues has been allocated to support over 350 units. The City Council authorized annual increases to the percentage of RPTT transferred to HCS until it reaches 100%.	Continue as Program H-33.
H-B-8	Review and document the performance of affordable housing programs annually. Report the number of affordable units developed from various funding sources, the number and income levels of households assisted through various programs and the	The City continues to review and document the performance of affordable housing programs annually, including reporting the number of affordable units developed from various funding sources, the number and income levels of households assisted through various programs, and the number of existing homes sold at affordable prices. This policy goal is met by various ongoing city	Continue. New program H-17.

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	Existing Program	Implementation Status	Revision to Existing Program
	number of existing homes sold at affordable prices.	housing programs and is reported annually to HCD and the City Council in compliance with state law.	
H-B-9	Continue to operate the Mobile Home Repair Loan and Mobile Home Rent Deferral programs.	Through 2021, the Department of Housing and Community Services administered a mobile home assistance program funded by HCD; as of early 2022, the program is inactive. Through June 2021, the program had provided financial support to 21 mobile home owners, with a total of \$618,776 in CalHome Rehab funds.	Combine with Programs H-A-3, H-B-1 and H-B-4, modify and continue as new Programs H-8A and H-12.
H-B-10	Recognize existing nonconforming residential uses which are located in non-residential land use categories. Allow such uses to be zoned residential and to be found consistent with the General Plan on an interim basis, until the area is ready to convert and rezone to non-residential uses	The City continues to recognize existing nonconforming residential uses that are in non-residential land use categories. This policy is implemented on a project-by-project basis, as allowed through the non-conforming section in the City's Zoning Code.	Delete. This is implemented through the City's Zoning Code.
H-C-1	Amend the Housing Allocation Plan, the city's inclusionary housing ordinance, to change the trigger for provision of affordable units from acres to units and to consider elimination of the exemption for mixed use developments and a commercial linkage fee.	In 2019, the Inclusionary Housing Ordinance was amended to: (1) Revise the inclusionary (on-site) affordable unit percentage requirement (2) Modify the Housing Impact Fee structure (3) Reduce the inclusionary percentage and housing impact fee for multifamily housing and mixed-use development in the Downtown Area to help encourage higher-intensity development, and (4) Establish a new Commercial Linkage Fee to increase affordable housing development within the city.	Combine with Programs H-C-2 and H-C-3, modify, and continue as new Program H-18.
H-C-2	Implement the Housing Allocation Plan to increase the number of affordable units in Santa Rosa, both on site and through collection of in lieu fees and subsequent development of affordable units.	The City continues to implement its 2016 Housing Action Plan, which continues to increase affordable housing development, particularly through the Housing Allocation Plan Ordinance (also known as the "Inclusionary Housing" Ordinance). The City continues to implement the Housing Allocation Plan to increase the number of affordable units in Santa Rosa, both on site and through collection of in-lieu fees used to subsidize affordable housing projects in various stages of financing. Since the City began	Combine with Programs H-C-1 and H-C-3, modify, and continue, as new Program H-18.

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	tracking the program in 2018, it has contributed \$6.2 million to housing projects. 2018: \$2.26 million 2019: \$2.81 million 2020: \$1.2 million	
H-C-3	Utilize fees generated through the Housing Allocation Plan for the development of housing units affordable to extremely low, very low, and low income households. The City continues to use fees generated through the Housing Allocation Plan for the development of housing units affordable to extremely low-, very low-, and low-income households. Since its inception in 1992, more than 1,800 affordable units have been supported through this fee, with a total of \$28,402,475 awarded in loan funds. Funding awards by income level are as follows: Approximately 426 units at 30% AMI Approximately 729 units at 50% AMI Approximately 143 units at 60% AMI Approximately 29 units at 120% AMI Of the awards since 1992, 379 awards, totaling \$13,468,088, have been issued between 2015 and late 2021. Some of the Housing Allocation Plan funding awards have supported special-needs groups. The City does not track specific metrics related to the special needs of the population served. The City continues to implement the Housing Allocation Plan to increase the number of affordable units in Santa Rosa, both on site and through collection of in-lieu fees used to subsidize affordable housing projects in various stages of financing. 2018: \$2.26 million 2019: \$2.81 million 2020: \$1.2 million	Combine with Programs H-C-1 and H-C-2, modify and continue as new Program H-18.

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	Existing Program	Implementation Status	Revision to Existing Program
H-C-4	Consider a Commercial Linkage Fee for non-residential development to increase funds available for the development of housing units affordable to very low and low income households	This implementation Program was completed through the 2019 update to the City's Inclusionary Housing Policy.	Delete, program completed.
H-C-5	Rezone Medium and Medium High Density sites of two acres or more concurrent with the adoption of this Housing Element to facilitate the development of higher density sites	The City implemented the rezoning of Medium- and Medium High-Density sites of two acres or more concurrent with the adoption of the Housing Element to facilitate the development of higher-density sites.	Delete, program completed.
H-C-6	Rezone residential and mixed use sites in the Downtown Station Area Specific Plan boundary to allow residential uses by right.	The City implemented rezoning residential and mixed-use sites in the Downtown Station Area Specific Plan boundary to allow residential uses by right. SMART station areas were rezoned to transit village designations to achieve consistency with the General Plan and to facilitate housing development in the station area plan boundary. This action addressed a shortfall of sites needed to meet Santa Rosa's housing need.	Delete, program completed.
H-C-7	Utilize the Santa Rosa Housing Trust to maximize and leverage available federal, state, and local funding to assist in the development of affordable housing, the preservation and rehabilitation of low income housing, the development and maintenance of homeless shelters, and the acquisition and development of facilities for the physically and developmentally disabled	The City continues to use the Santa Rosa Housing Trust to maximize and leverage available federal, state, and local funding to assist in the development of affordable housing, the preservation and rehabilitation of low-income housing, the development and maintenance of homeless shelters, and the acquisition and development of facilities for the physically and developmentally disabled.	Continue as Program H-16.
H-C-8	Continue to provide funding for affordable housing projects, particularly if a portion of the project units are targeted to extremely low income households.	The City continues to provide financing for affordable housing projects through various ongoing grant programs and the use of in-lieu fees.	Combine with Programs H-C-9, H-C-10, H-C-13, H-C-14, H-C-15, and H-C-16, modify, and continue as new Program H-21.

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H-C-9	Allow Low Density sites of 3 acres or less to develop at densities up to 15 units per acre under the following conditions: • Where infrastructure is sufficient to support the increased density; • When the project design is compatible with the surrounding residential neighborhood in terms of building mass, setbacks and landscaping; • Where at least one very low or two low income rental units are included for every 10 market rate units with affordability maintained for 10 years; and • Where affordable housing units are incorporated into the neighborhood using superior design such that affordable units are indistinguishable from market rate units.	The City implements the policy for allowing density sites that meet certain conditions as well as 3 acres or less to develop at densities up to 15 units per acre on a project-by-project basis. Combine with Programs H-C-8, H-C-10, H-C-13, H-C-14, H-C-15, and H-C-16, modify and continue as new Program H-21.
H-C-10	Encourage production of residential units downtown as envisioned by the Downtown Station Area Specific Plan. The City Council approved an updated Downtown Station Area Specific Plan in October 2020. The updated plan uses floor-area ratios (FAR) to encourage maximum density, reduces parking requirements, and provides fee-reduction incentives and other streamlining Programs for downtown development. As of January 2022, 596 residential units are currently under construction and an additional 757 housing units are under planning review or have been approved in the Downtown Station Area Plan. A November 2020 amendment to the City's Resilient City Development Programs extends Programs that encourage housing and economic development within the City, including reduced review authority for certain uses within the Downtown Station Area. Also, Design Review for new development or major remodel projects within the Downtown Station Area boundary is delegated to the	Combine with Programs H-C-8, H-C-9, H-C-13, H-C-14, H-C-15, and H-C-16, modify, and continue as new Program H-21.

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		Zoning Administrator through the Minor Design Review process further streamlining the permitting process.	
H-C-11	Provide opportunities for higher density and affordable housing development on regional/arterial streets and near the rail transit corridor for convenient access to bus and rail transit.	The City's General Plan 2035, the Northwest Station Area Specific Plan, and the Downtown Station Area Specific Plan designate higher-density sites along regional/arterial streets and the rail corridor. Ongoing streamlining efforts incentivize development in these areas through reduced parking requirements, increased height limits, the City's density bonus ordinance, and fee incentives. The General Plan update process will include review for possible increased housing densities citywide. The City will continue to seek opportunities for building affordable housing in the designated higher-density sites along regional/arterial streets and the rail corridor.	Continue as Program H-4.
H-C-12	Promote the development of second units. Discuss this option with residential developers during initial development application meetings.	The City continues to facilitate the development of Accessory Dwelling Units (ADUs). The City-approved zoning code revisions comply with state law and create setback and parking exceptions, and fee reductions for ADUs. In addition, utility connection fees were eliminated for ADUs less than 750 square feet. ADU applications received: 2018: 118 (281% increase from 2017). 2019: 164 (39% increase from 2018). 2020: 61	Modify and continue as new Program H-5.

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H-C-13	Support affordable housing sponsors by continuing to provide funds to subsidize the production of affordable housing.	The City continues to support affordable housing sponsors by providing funds to subsidize the production of affordable housing. Through the Housing Authority, the City provides annual funding from a compilation of federal and local sources and programs to finance affordable housing production. As of January 2022, the Housing Authority Loan Portfolio includes approximately \$155 million in loan funds for over 4,500 subsidized units, across all funding sources.	Combine with Programs H-C-8, H-C-9, H-C-10, H-C-14, H-C-15, and H-C-16, modify and continue as new Program H-21.
H-C-14	Continue commitment of redevelopment area tax increment funds for affordable housing programs. Utilize the Redevelopment Low- and Moderate-Income Housing Fund for affordable housing targeting extremely low, very low-, low-, and moderate-income households.	With the dissolution of redevelopment by the Governor of CA in 2011, loan repayment funds are used to rehabilitate existing dwelling units, acquire land for development of new affordable units, and provide financial assistance to permanent supportive housing units.	Combine with Programs H-C-8, H-C-9, H-C-10, H-C-13, H-C-15, and H-C-16, modify and continue as new Program H-21.
H-C-15	Participate in tax credit and mortgage revenue bond programs which provide tax exempt, low cost financing to developers of projects making a portion of the units affordable.	The City continues their participation in tax credit and mortgage revenue bond programs by providing tax credit applications and serving as the sponsor for affordable housing bond issuances.	Combine with Programs H-C-8, H-C-9, H-C-10, H-C-13, H-C-14, and H-C-16, modify, and continue as new Program H-21.
H-C-16	Aggressively participate in available federal, state, and private non-profit programs for the provision of affordable housing.	The City continues to participate in available federal, state, and private non-profit programs for the provision of affordable housing. This is done by City staff who works with HUD and HCD to access all available resources and grants to sustain and expand affordable housing in Santa Rosa.	Combine with H-C-8, H-C-9, H-C-10, H-C-13, H-C-14, and H-C-15, modify, and continue as new Program H-21.
H-C-17	Allow mobile homes on single family lots through issuance of a certificate of compatibility	The City continued to permit mobile homes who meet the standards on single-family lots citywide.	Delete, program completed

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H-C-18	Continue participation in the Mortgage Credit Certificate program to assist lower income and/or first time homebuyers in purchasing new homes	During the 5th cycle, the City continued to assist lower-income and/or first-time homebuyers in purchasing new homes by participating in the Mortgage Credit Certificate program. As of 2020, Mortgage Credit Certificates have not been available. In the meantime, staff is reviewing ability to reestablish the program.	Continue as Program H-34.
H-C-19	Investigate development of a Community Land Trust program for Santa Rosa to determine its feasibility and affordable housing production possibilities	The City investigated the development of a Community Land Trust program for Santa Rosa to determine its feasibility and affordable housing production possibilities. The City continues to support the Housing Land Trust of Sonoma County's (HLTSC) efforts to work with developers and non-profit organizations to further homeownership opportunities. In 2003, the City awarded a total \$240,000 to assist six households in partnership with Habitat for Humanity and the Housing Land Trust.	Continue as Program H-35.
H-C-20	Encourage the development of units with three or more bedrooms in affordable housing projects.	The City encouraged the development of units with three or more bedrooms in affordable housing projects. The staff continuously meets and confers with applicants to address and encourage all levels of housing types and affordability.	Continue as Program H-27.
H-D-1	Continue existing programs for persons with special needs, including disabled persons, elderly, homeless, large families, single parent households, and farmworkers.	The City continued to support existing programs—the Housing Accessibility Modification (HAM) Program, Housing Opportunities for Persons with Aids (HOPWA) which is funded by HUD, and supporting developments through loans from the Housing Authority—for persons with special needs, including disabled persons, elderly, homeless, large families, single-parent households, and farmworkers. The Housing Authority provides funding and regulatory oversight for properties that serve special-needs individuals and families.	Modify. Implemented with programs under Goal 3.

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H-D-2	Require new units specifically for households with special needs by conditioning new multifamily construction to meet federal and state requirements for accessibility and/or adaptability for disabled persons.	By conditioning new multifamily construction to meet federal and state requirements, the City achieved accessibility and adaptability for disabled persons during the 5th planning period.	Modify and continue as new Program H-22.
H-D-3	Evaluate issues of “visitability” in residential building design and develop a program for implementation of appropriate policies and/or standards	The California accessibility codes the City adopted have “visitability” standards for new multi-family residential.	Modify, combine with H-D-4. New program H-22.
H-D-4	Investigate and promote incorporation of universal design features in new residential construction by developing an ordinance based on the state’s voluntary model ordinance	The California accessibility codes the City adopted have “visitability” standards for new multi-family residential.	Modify, combine with H-D-3. New program H-22.
H-D-5	Encourage special housing arrangements, including shared and congregate housing and single room occupancy facilities (SROs), by helping sponsors obtain federal and state funds. Commit city funds (to the extent such funds are available for the purpose in light of competing housing objectives) to help non- profit developers of such housing types.	The City encouraged special housing arrangements, such as shared congregate housing and single-room occupancy facilities (SROs), by helping sponsors obtain federal and state funds. In addition to committing city funds, the City continues to facilitate and support innovative housing approaches on a project-by-project basis to provide a variety of housing opportunities.	Combine with Program H-D-6 and continue as new Program H-25.
H-D-6	Encourage the development of Single Room Occupancy facilities, consistent with the Single Room Occupancy Ordinance.	During the 5th planning period, the City encouraged the development of Single-Room Occupancy facilities. As of late, the City continues to facilitate and support innovative housing approaches on a project-by-project basis to provide a variety of housing opportunities.	Combine with Program H-D-5, modify and continue as new Program H-25.

1. Addendum to the Adopted General Plan EIR

	Existing Program	Implementation Status	Revision to Existing Program
H-D-7	Support the development of rental housing for seasonal and permanent farmworkers.	During the 5th planning period, the City continued to encourage the inclusion of units for farmworkers in new affordable housing projects. In May 2021, the Housing Authority awarded \$2.9 million in CDBG funds to the Mahonia Glen project. The Mahonia Glen project will be a 100% affordable residential project consisting of 99 units, including a resident manager unit, a shared community space, and large common green space. The residential units consist of one-, two-, and three-bedroom units in three-story buildings. Of the 99 units, 43 will be designated for farmworkers and their families with additional funding from the HCD Joe Serna Farmworker Housing Program. Construction is scheduled to start in summer 2022.	Combine with Program H-D-8, modify and continue as new Program H-23.
H-D-8	Amend the Zoning Code to include a provision allowing agricultural employee housing for six or fewer residents as a permitted residential use in residential zoning districts.	The City achieved amending the Zoning Code to include a provision allowing agricultural employee housing for six or fewer residents as a permitted residential use in residential zoning districts.	Combine with Program H-D-7, modify, and continue as new Program H-23.
H-D-9	Provide funding to groups providing shelter and other services to the homeless.	The City continues to provide funding annually for homeless shelters and services such as Catholic Charities, Community Action Partnership, Living Room, and YWCA Sonoma County. The current annual budget for these services is up to \$6 million.	Combine with Programs H-D-10 and H-D-12, modify, and continue as new Program H-24.
H-D-10	Amend the Zoning Code to allow emergency shelters as a permitted use in the General Commercial (CG) district, subject to the same development standards as other permitted uses in the CG zone.	The city achieved amending the Zoning Code to allow Emergency Shelters by right in the City's General Commercial (CG) zoning district.	Combine with Programs H-D-9 and H-D-12, modify, and continue as new Program H-20.

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	Existing Program	Implementation Status	Revision to Existing Program
H-D-11	Amend the Zoning Code to define supportive housing in the glossary and to allow transitional and supportive housing as residential uses, subject to the same regulations as other residential uses in the same zoning district.	The City achieved amending the Zoning Code to define supportive housing in the glossary and to allow transitional and supportive housing as residential uses, subject to the same regulations as other residential uses in the same zoning district.	Delete, program completed.
H-D-12	Support programs which address long term solutions to homelessness including job training and placement and which provide other supportive services.	The City continues to support programs that address long-term solutions to homelessness, including job training and placement and that provide other supportive services. The City invests approximately \$5 million annually in services to support persons experiencing homelessness, including daytime support, street outreach, a winter warming center, emergency shelter and safe parking, housing assistance, and supportive services. Efforts also assist homeless service providers such as Catholic Charities, the Living Room, Community Action Partnership, and YWCA Sonoma County.	Combine with Programs H-D-9 and H-D-10, modify, and continue as new Program H-24.
H-D-13	Provide incentives for development of housing for the elderly, particularly for those in need of assisted and skilled nursing care. Incentives may include density bonuses, reduced parking requirements or deferred development fees.	The City continues to provide incentives for development of housing for the elderly, particularly for those in need of assisted and skilled nursing care. Incentives may include density bonuses, reduced parking requirements or deferred development fees. Specifically, in 2016, Farmers Lane Senior Housing Project (DB 16-004) received a density bonus of five units which were designated for moderate- income households, and two concessions (1) height, to allow parapets, and (2) parking, and in 2020, Linda Tunis Senior Apartments (DB20-001) received a density bonus of three units which were restricted for very low-income households. The most recent Zoning Code includes reduced parking ratios and density bonus options for senior housing, and community care facilities.	Combine with Programs H-D-14, H-D-15, and H-D-16, modify and continue as new Programs H-26 and H-16.

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	Existing Program	Implementation Status	Revision to Existing Program
H-D-14	In new senior housing built receiving any development incentives or money from the city, require that a substantial portion, at least 25 percent, be available to low-income seniors.	The City implements on a project-by-project basis that any development building receiving incentives or money from the city are required to substantiate that at least 20 percent of units be available to low income seniors. In 2020 the Linda Tunis Senior Apartments were developed by converting an existing space to 26 affordable units, of which three units were allowed under density bonus law, ensuring that three units which were restricted for very low-income households.	Combine with Programs H-D-13, H-D-15, and H-D-16, modify, and continue as new Programs H-20 and H-22.
H-D-15	Encourage development of senior housing not receiving city funding or concessions to provide a substantial number of units affordable to low-income seniors	The City continues to encourage on a project-by-project basis the development of senior housing not receiving city funding or concessions to provide a substantial number of units affordable to low-income seniors. In 202 the Linda Tunis Senior Apartments (DB20-001) received a density bonus of three units which were restricted for very low-income households. Through the design guidelines which encourage innovative housing programs, the City hopes to stimulate development of senior housing to address the housing needs of the senior population in Santa Rosa. Additionally, with use of LEAP (Local Early Action Plan) funding, the City is launching House Santa Rosa which will provide for more transparency on available incentives and programs that are offered by the City.	Combine with Programs H-D-13, H-D-14, and H-D-16, modify, and continue as new Programs H-20 and H-22.
H-D-16	Through flexibility in design guidelines which encourage innovative housing programs, stimulate development of senior housing which addresses the housing needs of the senior population	The City continues to implement on a project-by-project basis design guidelines that can encourage innovative housing programs and stimulate the development of senior housing, which will address the housing needs of the senior population.	Combine with Programs H-D-13, H-D-14, and H-D-15, modify and continue as new Programs H-20 and H-22.
H-E-1	Eliminate discrimination in housing opportunities in Santa Rosa and assure that access to housing will not be denied on the basis of race, ethnic or national origin, religion, marital status, sexual orientation, age or physical disability. As an exception, mobile home parks and other developments	The City continues to eliminate discrimination in housing opportunities in Santa Rosa and assure that access to housing will not be denied on the basis of race, ethnic or national origin, religion, marital status, sexual orientation, age or physical disability. As an exception, mobile home parks and other developments designed specifically for seniors, or the disabled will be permitted to exclude children as permanent residents.	Combine with Program H-E-2, continue as new Program H-29.

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	Existing Program	Implementation Status	Revision to Existing Program
	designed specifically for seniors or the disabled will be permitted to exclude children as permanent residents.	The City promotes the activities of Fair Housing Advocates of Northern California (Fair Housing). Fair Housing prints brochures that are provided to the City of Santa Rosa for distribution to every HCV client and to others wishing this information. Fair Housing provides a number of services including mediation and resolution of tenant/landlord disputes and providing outreach services. Brochures are also provided to local service providers such as Becoming Independent and Disability Services and Legal Center. In 2019, the City added a Housing Anti-Discrimination chapter to City Code to prohibit housing discrimination based on source of income, including Housing Choice Vouchers and other rent subsidies.	
H-E-2	Continue to fund and support Fair Housing of Sonoma County, which serves as the city's equal opportunity housing agency.	The City continues to fund and support Fair Housing of Sonoma County, which serves as the City's equal opportunity housing agency. In addition, as a U.S. Department of Housing and Urban Development entitlement jurisdiction, the City provides annual funding for Fair Housing services. The City currently has a contract with Fair Housing Advocates of Northern California.	Combine with Program H-E-1, modify, and continue as new Program H-29.
H-F-1	Ensure that residential projects are heard by the first decision-making board, within a period not to exceed 120 days of receipt of an application for development approval	The City continues to ensure that residential projects are heard by the first decision-making board, within a period not to exceed 120 days of receipt of an application for development approval. In 2019, the City continued to improve interdepartmental coordination and effectively prioritize residential entitlement review, particularly residential projects with an affordable component. As part of the Planning and Economic Development's Housing Action Plan, Planning staff have been working on a suite of internal and external process improvements to assist applicants and City staff when submitting and reviewing residential projects. In 2020, despite pivoting to digital processing due to the COVID-19 pandemic the City continued to improve interdepartmental coordination and effectively prioritize residential entitlement review, particularly residential projects with an affordable component. Planning staff created and the public is now using a Universal Permit	Combine with Program H-F-4, modify, and continue as new Program H-37.

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	Existing Program	Implementation Status	Revision to Existing Program
		Application which streamlines and encourages more complete permit submittals shortening project review timelines.	
H-F-2	Fast track all development projects which are comprised fully of units affordable to extremely low, very low, and low income households with long term affordability restrictions. Utilize a fast track schedule mutually acceptable to the project applicant and the city.	The city continues to fast track all development projects, which are made up of fully of units affordable to extremely low, very low-, and low-income households with long-term affordability restrictions. As well as using a fast-track schedule mutually acceptable to the project applicant and the city. As of late, the City continues to prioritize affordable housing projects by coordinating and focusing staff efforts across departments on residential projects particularly those with high unit counts, and affordable units.	Modify, continue as new Program H-3.
H-F-3	Acquire sites for potential affordable housing projects, with subsequent disposition to affordable housing providers.	In 2015, the City allocated the old Bennet Valley Senior Center to affordable housing and is currently in a DDA (Development agreement) approved by Council for the transfer and development of affordable housing on those parcels. Since then, the City has not purchased property solely for affordable housing. The City continues to provide first right of refusal for surplus City land to developers of affordable housing. As determined by budget and goal-setting processes, the Housing Authority funds property acquisition and banks land acquired for later provision to affordable housing developers. The Economic Development and Housing staff also continue to seek opportunities to acquire sites throughout the planning period. In November 2020 the City's Real Property Team began a citywide survey to identify and classify surplus lands. One of the sites identified is APN 182-030-032.	Delete. This is an ongoing effort as sites are acquired. The City is not relying on acquired sites to meet the RHNA.
H-F-4	Defer payment of development fees for affordable units.	The City continues to allow applicants to defer impact fees to final occupancy instead of permit issuance. Many projects, including affordable housing developments, use the option to defer impact fees to final occupancy, though the City does not track specific numbers.	Combine with Program H-F-1, modify, and continue as new Program H-37.

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Existing Program		Implementation Status	Revision to Existing Program
H-F-5	Revise the local Density Bonus Ordinance to ensure it reflects state law and to simplify the city process of obtaining a density bonus.	The City continues to revise the local Density Bonus Ordinance to ensure it reflects state law and to simplify the City process of obtaining a density bonus. In January 2019, the City Council adopted a revised Density Bonus Ordinance consistent with state law and allowing up to 100% density bonus within the Downtown and North Station Area Specific Plan areas.	Delete, program completed.
H-F-6	Develop a checklist specific to affordable housing developments which will facilitate such projects in the Design Review process.	In 2019, the City began work to develop a checklist specific to affordable housing developments which will facilitate such projects in the Design Review process. The City Council adopted Objective Design Standards for Streamlined and Ministerial Residential Developments (Zoning Code Chapter 20-39) effective December 20, 2019, to incorporate the intent of the Santa Rosa Design Guidelines to the greatest extent possible while complying with the intent of State legislation to facilitate and expedite the construction of housing in Santa Rosa.	Delete, program completed.
H-F-7	Ensure that regulations contained in the Santa Rosa Zoning Code provide development standards, parking requirements, and use allowances which facilitate the development of housing for all income groups	The City has ensured that the Zoning Code contains a number of concessions and a reduced parking requirement to facilitate the development of housing for all income groups, including through the density bonus program and the housing allocation plan. The City's 2016 Housing Action Plan seeks to increase affordable housing development - a key tool in that effort is the Housing Allocation Plan Ordinance (renamed "Inclusionary Housing" Ordinance). In 2019, the Inclusionary Housing Ordinance was amended to: (1) Revise the inclusionary (on-site) affordable unit percentage requirement (2) Modify the Housing Impact Fee structure (3) Reduce the inclusionary percentage and housing impact fee for multifamily	Delete, program complete.

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	Existing Program	Implementation Status	Revision to Existing Program
		housing and mixed-use development in the Downtown Area to help encourage higher intensity development, (4) Establish a new Commercial Linkage Fee to increase affordable housing development within the City.	
H-F-8	Continue to participate in regional conservation efforts regarding sensitive habitat and endangered species to ensure that mitigation opportunities are available to maintain adequate sites at appropriate densities to accommodate the city's regional housing needs allocation.	The City continues to participate in regional conservation efforts regarding sensitive habitat and endangered species to ensure that mitigation opportunities are available to maintain adequate sites at appropriate densities to accommodate the city's regional housing needs allocation. On a project-by-project basis, the City continues to implement the requirements of CEQA as they pertain to California Tiger Salamander and other sensitive species, ensuring that appropriate mitigation is required when necessary.	Combine with Program H-A-1, modify, and continue as new Program H-1.
H-G-1	Maximize energy efficiency in residential areas.	The City continues to maximize energy efficiency in residential areas. The City participates in the County Property Assessed Clean Energy retrofit program, the Sonoma Clean Power renewable utility provider, and implementation of CALGreen building standards and select Tier 1 standards. The City has adopted all-electric reach code standards for most new residential development effective January 1, 2020. Projects are reviewed for compliance with the Climate Action Plan.	Combine with Programs H-G-2, H-G-3, H-G-4, H-G-5, H-G-6, H-G-7, and H-G-8, modify, and continue as new Program H-41.
H-G-2	Require, energy efficiency through site planning and building design by assisting residential developers in identifying energy conservation and efficiency Programs appropriate to the Santa Rosa area.	The City continues to require energy efficiency through site planning and building design by assisting residential developers in identifying energy conservation and efficiency Programs appropriate to the Santa Rosa area. The City participates in the County Property Assessed Clean Energy retrofit program, utilizes Sonoma Clean Power as utility provider, and implements CALGreen building standards and select Tier 1 standards. The City also implements the requirements of the City's	Combine with Programs H-G-1, H-G-3, H-G-4, H-G-5, H-G-6, H-G-7, and H-G-8, modify, and continue as new Program H-41.

1. Addendum to the Adopted General Plan EIR

Existing Program		Implementation Status	Revision to Existing Program
		Climate Action Plan at the project level and has adopted all-electric reach code standards for most new residential development effective January 1, 2020.	
H-G-3	Promote energy efficiency in the provision and use of water in all residential developments	The city promotes energy efficiency in the provision and use of water in all residential developments. In 2019, ongoing smart meter upgrade to replace existing manual reading meters to smart meters that can report hourly usage rates, detect leaks and water waste. In addition, new development is required to comply with CALGreen building standards, Water Efficient Landscape Ordinance, and the Climate Action Plan. In 2020, a citywide upgrade from manually read water meters to smart meters that report hourly usage rates, detect leaks and water waste was nearly completed.	Combine with Programs H-G-1, H-G-2, H-G-4, H-G-5, H-G-6, H-G-7, and H-G-8, modify, and continue as new Program H-41.
H-G-4	Reduce the amount of water used, encourage the use of recycled water for landscaping where available, and require compliance with the city's Water Efficient Landscape Policy	The City continues to reduce the amount of water used and require compliance with the City's Water-Efficient Landscape Policy. As of late, the City continues to implement WELO standards for new construction and administers rebate programs for turf replacement.	Combine with Programs H-G-1, H-G-2, H-G-3, H-G-5, H-G-6, H-G-7, and H-G-8, modify, and continue as new Program H-41.
H-G-5	Continue to require the use of fuel efficient heating and cooling equipment and other appliances, in accordance with the city's green building program.	The City continues to require the use of fuel-efficient heating and cooling equipment and other appliances, in accordance with the City's green building program. The City still implements CALGreen building standards and select Tier 1 standards for energy efficiency in new construction. CALGreen building standards are required also for additions and remodels. The City adopted all-electric reach code standards effective January 1, 2020, which are applicable for most new residential development.	Combine with Programs H-G-1, H-G-2, H-G-3, H-G-4, H-G-6, H-G-7, and H-G-8, modify, and continue as new Program H-41.

1. Addendum to the Adopted General Plan EIR

	Existing Program	Implementation Status	Revision to Existing Program
H-G-6	Continue to fund energy conservation through the Housing Authority’s rehabilitation loans and develop programs to assist low income households and rental properties in meeting weatherization and energy conservation needs.	The City continues to fund energy conservation through the Housing Authority’s rehabilitation loans and continues to develop programs to assist low-income households and rental properties in meeting weatherization and energy conservation needs. In 2020, the Housing Authority continues to use its affordable housing funds to construct new, energy efficient units and to rehabilitate residential units to include energy efficiency. In addition, the Housing Authority is tracking improvements for energy efficiency will be considered in the future.	Combine with Programs H-G-1, H-G-2, H-G-3, H-G-4, H-G-5, H-G-7, and H-G-8, modify, and continue as new Program H-41.
H-G-7	Work with organizations specializing in green building programs to develop public-private partnerships supporting energy efficiency retrofit programs for existing residential structures.	The City continues to work with organizations specializing in green building Programs to develop public-private partnerships supporting energy efficiency retrofit programs for existing residential structures. In 2020, the City continued to participate in the County's Property Assessed Clean Energy loan program for energy efficient retrofits of existing residential structures.	Combine with Programs H-G-1, H-G-2, H-G-3, H-G-4, H-G-5, H-G-6, and H-G-8, modify, and continue as new Program H-41.
H-G-8	Increase local energy awareness	The City continues to increase local energy awareness. In 2020, the City updated web resources to direct residents and developers to opportunities for energy efficient rebate programs, Property Assessed Clean Energy retrofit programs, and other energy-efficiency resources.	Combine with Programs H-G-1, H-G-2, H-G-3, H-G-4, H-G-5, H-G-6, and H-G-7, modify, and continue as new Program H-41.

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1.4 PURPOSE OF AN EIR ADDENDUM

According to CEQA Guidelines Section 15164(a), an addendum shall be prepared if some changes or additions to a previously adopted EIR are necessary, but none of the conditions enumerated in CEQA Guidelines Sections 15162(a)(1)–(3) calling for the preparation of a subsequent EIR have occurred. As stated in CEQA Guidelines Section 15162 (Subsequent EIRs and Negative Declarations):

When an EIR has been certified or negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:

- (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or negative declaration was adopted, shows any of the following:
 - (a) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
 - (b) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - (c) Mitigation Programs or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation Program or alternative; or
 - (d) Mitigation Programs or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation Program or alternative.

1.4.1 Rationale for Preparing an EIR Addendum

Because all the sites included in the Housing Element would not require any designation or zone changes,, the proposed change in type of development would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects requiring major revisions to the General Plan EIR. Development impacts are addressed through policies in the General Plan, the City's municipal code, and adopted engineering standards. As all future development projects must be consistent with the General Plan, and physical impacts from development were anticipated in the General Plan EIR, the

1. Addendum to the Adopted General Plan EIR

proposed project does not meet any of the conditions outlined in CEQA Guidelines Section 15162 that would require a subsequent EIR.

As stated in CEQA Guidelines Section 15164 (Addendum to an EIR):

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

A copy of this addendum, and all supporting documentation, may be reviewed or obtained at the City of Santa Rosa Planning and Economic Development Department, 100 Santa Rosa Avenue, Room 3, Santa Rosa, CA 95404.

2. CEQA Analysis

2.1 ENVIRONMENTAL ANALYSIS

The General Plan contains policies related to land use, urban design, transportation, housing, 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 largely designed to be self-mitigating by incorporating policies and implementation programs that address and mitigate environmental impacts related to implementing the General Plan, such as zoning codes and design standards.

As described in Section 1.2, the General Plan EIR addresses potentially significant impacts related to 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 resources; open space and agriculture; geology, soils, and seismicity; hazards and hazardous materials; energy; and parks and recreation. Table 1-1 shows that most of the existing Housing Element programs will remain unchanged with the proposed project. The 12 new programs are either informative or would result in no physical change to the environment. Overall, the programs were modified to comply with State law, respond to directives from the California Department of Housing and Community Development (HCD), combine programs with similar intent to aid in implementation, or eliminate programs where the City has already completed the identified task. Sections 2.1.1 through 2.1.3 describe the informational changes of the amended and new programs resulting from the proposed project. These sections do not include the programs that were deleted from the Housing Element or the programs that underwent minor changes. Section 2.1.4 comprehensively analyzes the amended and new programs and describes why potential environmental effects of the proposed project would be no more substantial than analyzed in the General Plan EIR.

2.1.1 Amended Programs

- Program H-A-5 was amended to include a new aim to develop a neighborhood outreach program in predominantly single-family neighborhoods in the City of Santa Rosa. This program would be designed to facilitate meaningful discussions around housing opportunities and providing a variety of housing types in Santa Rosa. This program is included in the Housing Element Update as Program H-28.
- Program H-B-3 was amended to add specific actions that the City will take to protect affordable housing conversion. These include maintaining a database of affordable housing properties, contacting property owners of units at risk of converting to market-rate housing, coordinating with owners of expiring subsidies to ensure the required notices to tenants are sent out, reaching out to agencies interested in purchasing and/or managing at-risk units, and working with tenants to provide

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multilingual education regarding tenant rights and conversion procedures pursuant to California law. This program is included in the Housing Element Update as Program H-15.

- Program H-B-6 was amended to expand on the Program's intent to administer the Section Housing Choice Voucher rental assistance program by specifying that the Santa Rosa Housing Authority should actively emphasize and promote acceptance of vouchers to property owners in high-resource neighborhoods and continue to maintain multilingual information about this program on the City's website and at public meetings and events. The program also directs the City to develop an educational program for homeowners and property owners to increase awareness of the Housing Choice Voucher program assistance that includes proactive Programs to engage the public. This program is included in the Housing Element Update as Program H-36.
- Program H-B-7 was amended to direct the City to consider increasing the portion of the tax designated for affordable housing and use these additional funds to assist with the development of affordable units. This program is included in the Housing Element Update as Program H-33.
- Program H-C-7 was amended to direct the City to implement a system to track projects supported by the Santa Rosa Housing Trust, including units by affordability category. This program is included in the Housing Element Update as Program H-16.
- Program H-C-11 was amended to specify the target of this Program as the Opportunity Areas defined in the Downtown Station Area Specific Plan and other Priority Development Areas. This program is included in the Housing Element Update as Program H-4.
- Program H-C-12 was amended to include specific actions that would promote the construction of affordable ADU's. These include continuing to implement a multilingual public information and proactive outreach campaign via the City's website and other outlets to inform property owners of the standards for ADU development, permitting procedures, construction resources, and the importance of ADUs to Santa Rosa, including ADUs affordable to lower-income households; collaborating with Napa Sonoma ADU to offer residents pre-reviewed plans and provide incentives to residents using these pre-reviewed plans; providing information and offer review of resident's homes floor plan; and identifying incentives for construction of ADUs with new development, among other actions. This program is included in the Housing Element Update as Program H-5.
- Program H-C-18 was amended to specify where the Mortgage Credit Certificate program should be targeted. The new Program specifies that the City will promote the availability of these programs in areas with concentrations of renters, particularly low-income renters and Equity Priority Populations. This program is included in the Housing Element Update as Program H-34.
- Program H-C-19 was amended to specify that the City will continue to support Sonoma County's Housing Land Trust of Sonoma County program while continuing to investigate the feasibility of

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developing a Land Trust program in Santa Rosa. This program is included in the Housing Element Update as Program H-35.

- Program H-C-20 was amended to include an additional provision for the Program that encourages affordable housing development that provides amenities for residents, such as on-site recreational facilities, children's programs (day care and/or after-school care), and community meeting spaces. This program is included in the Housing Element Update as Program H-20.
- Program H-D-2 was amended to include a variety of actions that the City should implement to ensure that persons with disabilities have increased access/placement in residential units rehabilitated or constructed through City and County programs. These actions include continuing to cooperate with nonprofit agencies that provide placement or referral services for persons with disabilities; by June 2024, developing targeted marketing plan to promote local resources and programs for persons with disabilities, including educational materials on reasonable accommodation, housing rights, and access to legal aid; and encouraging development of housing with visitability standards. This program is included in the Housing Element Update as Program H-22.
- Program H-F-2 was amended to change the target of the Program the development of affordable units to the development of residential units in mixed-use projects. The new program also specifies actions that would create incentives for this type of development including, priority project processing, deferral of development impact or permit fees, flexibility in development standards, density bonuses, and support for infrastructure upgrades. This program is included in the Housing Element Update as Program H-3.

2.1.2 Combined and Amended Programs

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

- Program H-A-1 and Program H-F-8. The new program is H-1.
- Program H-A-3, Program H-B-1, Program H-B-4, and Program H-B-9. The new programs are H-8A and H-9.
- Program H-C-1, Program H-C-2, and Program H-C-3. The new program is H-18.
- Program H-C-8, Program H-C-9, Program H-C-10, Program H-C-13, Program H-C-14, Program H-C-15, and Program H-C-16. The new program is H-21.
- Program H-D-5 and Program H-C-6. The new program is H-25.
- Programs H-D-7 and Program H-D-8. The new program is H-23.

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- Program H-D-9, Program H-D-10, and Program H-D-12. The new program is H-24.
- Program H-D-13, Program H-D-14, Program H-D-15, and Program H-D-16. The new program is H-16.
- Program H-E-1 and Program H-E-2. The new program is H-29.
- Program H-F-1 and Program H-F-4. The new program is H-37.
- Program H-G-1, Program H-G-2, Program H-G-4, Program H-G-6, Program H-G-7, and Program H-G-8. The new program is H-41.

2.1.3 New Programs

The 12 new programs represent changes that would:

- Facilitate the consolidation of small lots in the Downtown Station Area Specific Plan to allow development to utilize the land more efficiently, achieve economies of scale, and offer opportunity for improved site design and amenities. (Program H-2)
- Explore innovative and alternative housing options that provide greater flexibility and affordability in the housing stock. This may include consideration for further reduction in regulatory barriers for tiny houses, inclusionary housing, microhomes, housing cooperatives, and other alternative housing types as well as explore a variety of densities and housing types in all zoning districts. (Program H-6)
- Strive to receive and maintain the State's Prohousing Designation. (Program H-7)
- Provide by-right development when at least 20 percent of the units in the proposed development are affordable to lower-income households for sites that have been identified in the prior fifth Cycle Housing Element. (Program H-8)
- Direct the City to complete a Housing Conditions Survey in older neighborhoods and neighborhoods with lower median incomes, to evaluate rehabilitation need. Based on findings of the focused evaluation, the City would identify Programs to encourage housing preservation, conservation, and acquisition rehabilitation, and mitigate potential costs, displacement and relocation impacts on residents. (Program H-11)
- Continue the Mobile Home Park Rent Review Program and encourage affected residents to convene quarterly meetings to assure that the amount of rent charged at mobile home parks does not increase more than the amount set forth in the Mobile Home Park Rent Control Ordinance. (Program H-14)
- Develop and implement a system to review and document the number of affordable units annually. (Program H-17)

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- Implement actions to Affirmatively Furthering Fair Housing that address significant disparities in housing needs and in access to opportunity for all persons regardless of race, color, religion, sex, gender, sexual orientation, marital status, national origin, ancestry, familial status, source of income, or disability, and other characteristic protected by the California Fair Employment and Housing Act. This program includes actions targeted at anti-displacement. (Program H-30)
- Implement actions to Affirmatively Furthering Fair Housing that address significant disparities in housing needs and in access to opportunity for all persons regardless of race, color, religion, sex, gender, sexual orientation, marital status, national origin, ancestry, familial status, source of income, or disability, and other characteristic protected by the California Fair Employment and Housing Act. This program includes actions targeted at place-based revitalization. (Program H-31)
- Assist with tenant protections and eviction prevention by continuing to provide services to tenants for eviction defense, tenant legal services, educational services, fair housing assistance, relocation help in substandard housing; exploring the development of a landlord –tenant mediation services program; collaborating with non-profits and grass roots organizations to support tenants' rights and provide educational opportunities for tenants and landlords; exploring the development of an Anti-Eviction – Emergency Rental Assistance Fund Program for Santa Rosa low-income residents; and explore programs implemented by other jurisdictions to address the disproportionate impact of evictions and displacement of communities of color. (Program H-32)
- Ensure that the regulations contained in the Santa Rosa Zoning Code provide development standards, parking requirements, and use allowances that facilitate the development of housing for all income groups. (Program H-38)
- Adopt a written policy with specific objective standards for meeting the priority requirement for proposed developments that include housing units affordable to lower-income households, with respect to water and wastewater availability. (Program H-42)

2.1.4 Analysis of Programs

New development resulting from these programs would occur on land currently designated for housing under the City's General Plan and analyzed in the General Plan EIR. Furthermore, all future development in the City would be required to comply with local regulations, including the City's General Plan and Zoning Code. Consequently, all projects would be subject to development procedures of the City, such as the Municipal Code, Zoning Code, and subdivision standards. These local regulations guide future development and would address physical impacts resulting from development. The General Plan policies and ordinances of the City address the physical impacts associated with all development such as dust control, noise, odor, etc. The policies and ordinances that regulate development will not change with adoption of the proposed Housing Element. The General Plan EIR anticipated physical impacts associated with the permitted uses in the City's Zoning Code and would, therefore, not result in a new impact as part of development. The policies identified in the General Plan EIR to reduce physical environmental effects would continue to apply to all development.

2. CEQA Analysis

The public service impacts associated with the potential population increase that could be associated with new housing include police and fire services, parks, water, and sewer. The water and sewer impacts would be addressed through connection fees as part of the development process. Additional services for police and fire would only result in a physical impact if new facilities were required to meet the growth needs. If additional physical facilities for police and fire are needed this would be determined when the sites are identified and then included in the capital improvement program and subsequently the impact fees associated with each unit.

Furthermore, the units identified in this Housing Element would not exceed the City's population and housing projections for 2030 that are listed in Table 3-1, *Buildout Changes Between 2020 to 2035 General Plans*, of the 2030 General Plan EIR. This table shows the total housing unit buildout for the City by 2030 as 94,840 units. The capacity identified in this Housing Element (Table 5-9 in the 2023–2031 Housing Element), is 9,944 units which when added to the City's number of current number of units is 80,901 units (DOF 2022). Similarly, the estimated number of residents that would be added to the City under full buildout of the 2023–2031 Housing Element is 25,474 residents, which when added to the City's 2022 population is 201,249 (DOF 2022). Thus, there would be 32,271 fewer residents than the 2030 buildout population described in the General Plan EIR which is 233,520 residents.

All housing developments in which at least 20 percent of the units are affordable to lower-income households on three sites (sites numbers 5, 7, and 8) listed in Table 5-7 of the Housing Element Update are allowed for residential use by-right—as described in Program H-8, Sites Identified in Previous Cycles, would be required to be evaluated in accordance with the Zoning Code. Future by-right development would still be subject to federal, state, and local policies related to land use, such as the Migratory Bird Treaty Act, wetland conservation, and construction air quality permitting. Moreover, the City maintains a thorough building permit review process that ensures compliance with federal, state, and local regulations, such as dust control, stormwater runoff, and water quality, prior to the issuance of any building permit. The building permit and development review process is independent of the CEQA process and would be unaffected by the change to by-right zoning. Additionally, prior to issuance of any building permit, a project applicant is required to pay development impact fees, which would address potential impacts to public services and regional transportation improvements. The policies identified in the General Plan EIR to reduce physical environmental effects would continue to apply to future development and would reduce impacts to the same significance level as identified in the General Plan EIR.

The proposed Housing Element establishes targets for the income accessibility of future housing; however, the ability to construct the housing is based on designations in the Land Use Element. Because the City can meet its RHNA without changing any land use designation, the Land Use Element remains unchanged from the document evaluated in the General Plan EIR. The proposed Housing Element does not change the development pattern for the City, as shown in the Land Use Element of the General Plan and the zoning map for the City. Physical change to the environment would occur from implementation of the Land Use Element of the City's General Plan, not the proposed Housing Element. Therefore, development of housing as considered in the proposed Housing Element would be consistent with what was analyzed in the General Plan EIR. Because the proposed Housing Element does not affect the land use pattern of the City or result in any physical change to the environment, and because the General Plan EIR evaluated the existing land use pattern and includes policies and programs to address environmental impacts, the update to the Housing Element

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would not result in any new environmental impacts or increase the severity of any environmental impacts previously evaluated in the General Plan EIR. Because the proposed 2023–2031 Housing Element does not change any land use designation or zoning district, the impacts of the proposed project would be no more substantial than analyzed in the General Plan EIR. No new mitigation measures are necessary.

2.2 FINDING

The discussion in this addendum confirms that the proposed project has been evaluated for significant impacts pursuant to CEQA. The discussion is meaningfully different than a determination that a project is “exempt” from CEQA review, as the proposed 2023–2031 Housing Element update is not exempt. Rather, the determination here is that the General Plan EIR evaluated the physical impacts likely to result from future development. As the proposed 2023–2031 Housing Element does not change any land use designation or approve any development, the General Plan EIR provides a sufficient and adequate analysis of the environmental impacts of the proposed 2023–2031 Housing Element.

There are no substantial changes in the circumstances or new information that was not known and could not have been known at the time of the adoption of the General Plan EIR. The proposed project consists entirely of land uses permitted by project sites’ existing General Plan land use designation and zoning and represents no change from the impacts that were assumed and analyzed by the General Plan EIR.

As a result, and for the reasons explained in this addendum, the project would not cause any new significant environmental impacts or substantially increase the severity of significant environmental impacts disclosed in the General Plan EIR. Thus, the proposed project does not trigger any of the conditions in CEQA Guidelines Section 15162 allowing the preparation of a subsequent EIR, and the appropriate environmental document as authorized by CEQA Guidelines Section 15164(b) is an addendum. Accordingly, this EIR addendum has been prepared.

The following identifies the standards set forth in Section 15162 of the CEQA Guidelines as they relate to the proposed project. The text that follows the provisions of the law relates to the proposed 2023–2031 Housing Element.

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

As shown in Table 1-1, the program changes included in the proposed Housing Element are limited to complying with State law, combining programs with similar intent to aid in implementation, or elimination of programs where the City has already completed the identified task. The proposed project would not result in the rezoning of land or approval of any development project. All development in the City must be consistent with the General Plan, and if a discretionary action, would also be subject to CEQA.

- 2. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the EIR was certified shows:**

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

The General Plan EIR addresses potentially significant impacts related to 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 resources; open space and agriculture; geology, soils, and seismicity; hazards and hazardous materials; energy; and parks and recreation. The policies identified in the General Plan EIR to reduce physical environmental effects would also apply to the proposed project. The proposed Housing Element programs are similar to the existing programs of the General Plan. The proposed 2023–2031 Housing Element includes 26 amended programs and 12 new programs. These amended and new programs would not result in new significant environmental impacts. The City's General Plan provides for housing growth in the City over time. The proposed Housing Element identifies targets for housing at different income levels but does not include development of an unusual type, scale, or location that would not have been evaluated in the General Plan EIR. Because a development project must be consistent with the General Plan, zoning, and development standards of the City, the adopted measures to address physical impacts on the environment would be applied resulting in the same impacts as evaluated in the General Plan EIR. Therefore, there would be no new environmental impacts.

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

The proposed project would have the same significant impacts as those disclosed in the certified General Plan EIR. The General Plan EIR identified significant and unavoidable impacts related to transportation and air quality. The policies identified in the General Plan EIR to reduce physical environmental effects would also apply to the proposed project. Because the proposed project does not include land use changes and the new and amended programs identified in Table 1-1 would not affect land use patterns in the City or result in physical changes to the environment, there would be no new or more severe significant impacts associated with the proposed 2023–2031 Housing Element.

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.

The proposed project includes policy-level changes that are limited to complying with State law and would not result in physical changes to the environment that were not disclosed in the General Plan EIR. Moreover, the proposed project would not create new impacts or the need for additional mitigation measures. The policies identified in the General Plan EIR would reduce physical environmental effects associated with future development. These policies in the General Plan EIR would also apply to the 2023–2031 Housing Element. The City is required to adopt a Housing Element and the element must be reviewed and certified by HCD. There is no feasible alternative to adopting a Housing Element. The update to the Housing Element would not result in significant environmental impacts or increase the severity of any environmental impacts previously evaluated in the General Plan EIR; therefore, there is no need for new mitigation measures or alternatives.

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- d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.**

The proposed project would have the same significant impacts as the previously certified General Plan EIR, and all associated policies and mitigation measures identified in the General Plan EIR to reduce physical environmental effects would apply to all future development. There would be no new significant impacts resulting from adoption of the 2023–2031 Housing Element; therefore, there would be no new mitigation measures or alternatives required for the proposed Housing Element.

2.3 REFERENCES

Department of Finance (DOF). 2022. E-5 Population and Housing Estimates for Cities, Counties, and the State, 2020-2022. <https://dof.ca.gov/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2022/>