EXHIBIT B

October 2025 |

ADDENDUM TO THE ENVIRONMENTAL IMPACT REPORT FOR THE MENDOCINO COUNTY GENERAL PLAN (SCH No. 2008062074) FOR AMENDMENTS TO CHAPTER 6 (COMMUNITY SPECIFIC POLICIES) OF THE GENERAL PLAN

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1. Addendum to the Certified General Plan EIR

1.1 BACKGROUND

The General Plan is the foundational development policy document of the County. It defines the framework by which the physical, economic, and human resources of the County are managed and used over time. The General Plan acts to clarify and articulate the County's intentions concerning 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 the development of the County and all sectors' responsibilities in meeting these.

Mendocino County's General Plan is divided into 7 Chapters which include required portions such as the Development Element, Housing Element, and Coastal Element. Chapter 6 covers Community Specific Policies, which provide development goals and policies specific to the needs of various communities throughout the County. These policies are developed in coordination with the communities themselves, typically through work by a local community organization or Municipal Advisory Council (MAC).

In 2016, the Mendocino County Board of Supervisors adopted Resolution No. 16-057 establishing a MAC for the community of Redwood Valley. One of the listed duties and first goals of the RVMAC was to review, revise and implement the Community Action Plan (CAP) that would be used to guide future development in Redwood Valley. From 2017 to 2023, the RVMAC held a number of stakeholder meetings and was successful in creating a CAP that largely reflects the needs of the community. The CAP as presented contains several sections, including a number of goals, policies, and action items, as well as a set of recommended design guidelines. Some elements of the goals and policies can be incorporated into the General Plan and the design guidelines will be available to individuals wishing to undertake development in Redwood Valley but are non-binding. The Department is recommending minor updates to Chapter 6 of the General Plan in order to include a number of recommendations from the CAP, as well as to take the opportunity to make minor corrections and updates.

The proposed project will not result in physical changes to the environment. None of the updates in the proposed project would change the existing land use pattern established by the General Plan and evaluated in the General Plan EIR. All future construction within the County must comply with the General Plan, the zoning ordinance, state and federal permits, and local development standards. In addition, future discretionary actions (i.e., administrative permits, use permits, site plan review) require independent and project-specific environmental review.

This document serves as the environmental documentation for the County's proposed General Plan update. The California Environmental Quality Act (Public Resources Code section 21000 *et seq.*; "CEQA") and its implementing Guidelines (14 Cal. Code Regs. 15000 *et seq.*; "CEQA Guidelines") apply to the proposed amendments. In the case of a modification to a project for which an EIR has been approved (as is the case with the proposed update), CEQA and the CEQA Guidelines require the lead agency to determine whether a supplemental or subsequent EIR is required. This requirement is codified in Public Resources Code section 21166 and also stated in CEQA Guidelines Section 15162. Section 15162 provides guidance in this process by requiring an examination of whether, since the certification of the EIR and approval of the original project, changes in the project or conditions have been made to such an extent that the proposal may result in substantial changes in physical conditions that are considered significant under CEQA. If so, the County would be required to prepare a subsequent or supplemental environmental review document. 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, an addendum may be prepared. The addendum should include a brief explanation of the decision not to prepare a subsequent or

supplemental environmental document, supported by substantial evidence, and the lead agency's required findings on the project.

This Addendum examines the proposed amendments in accordance with Section 15162. This addendum to the Mendocino County General Plan EIR demonstrates that the analysis contained in the existing EIR adequately addresses the potential physical impacts associated with incorporation of the proposed updates. None of the conditions described in CEQA Guidelines Section 15162, calling for the preparation of a subsequent EIR or negative declaration, exist.

The current adopted version of the Mendocino County General Plan EIR may be found at the following website: https://www.mendocinocounty.gov/departments/planning-building-services/long-range-plans.

1.2 SUMMARY OF SIGNIFICANT & UNAVOIDABLE IMPACTS IDENTIFIED IN GENERAL PLAN EIR

On August 17, 2009, the Mendocino County Board of Supervisors adopted Resolution No. 09-182 certifying the Final Environmental Impact Report for the 2009 Mendocino County General Plan Update ("General Plan EIR"), making findings of fact related to the feasibility of mitigation measures and project alternatives, adopting a Statement of Overriding Considerations, and adopting a mitigation monitoring and reporting program. The resolution identifies the following significant, unavoidable, growth inducing, and/or cumulative significant impacts:

(a) Air Quality:

(1) Impact 4.3.2: Subsequent land use activities associated with implementation of the proposed General Plan may result in short-term emissions generated by construction and demolition activities that would affect local air quality and could result in health and nuisance-type impacts in the immediate vicinity of individual construction sites as well as contribute to particulate matter and regional ozone impacts. Even with implementation of the air quality related policies and action items of the proposed General Plan Update Resource Management Element this impact would remain significant, and there are no other feasible mitigation measures or alternatives that would reduce this impact to a less than significant level.

(2) Impact 4.3.3: Negative air quality impacts associated with long-term emissions from projected growth over the planning horizon of the General Plan Update may result in violations of ambient air quality standards or create significant nuisance impacts (e.g., wood smoke). Even with implementation of the air quality related policies and action items of the proposed General Plan Update Resource Management Element this impact would remain significant, and there are no other feasible mitigation measures or alternatives that would reduce this impact to a less than significant level.

(3) Impact 4.3.4: Subsequent land use activities associated with implementation of the proposed General Plan Update may result in projects that would include sources of toxic air contaminants which may affect surrounding land uses/or place sensitive land uses near existing sources of toxic air contaminants. Even with implementation of the air quality related policies and action items of the proposed General Plan Update Resource Management Element this impact would remain significant, and there are no other feasible mitigation measures or alternatives that would reduce this impact to a less than significant level.

(4) Impact 5.0.3: Subsequent land use development activities associated with implementation of the proposed General Plan along with existing, approved, proposed, and reasonably foreseeable cumulative development within the air basin would contribute to regional air quality impacts. The proposed General Plan Update' s contribution to these conditions is cumulatively considerable. Even with implementation of the air quality related policies and action items of the proposed General Plan Update Resource Management Element this

impact would remain significant, and there are no other feasible mitigation measures or alternatives that would reduce this impact to a less than significant level.

(5) Impact 5.0.4: Subsequent land use activities associated with implementation of the proposed General Plan Update, in combination with existing, approved, proposed, and reasonably foreseeable development in the county, would result in the cumulative increase of greenhouse gases including CO2 emitted into the atmosphere. The proposed General Plan Update's contribution to this impact would be cumulatively considerable. Proposed General Plan policies and action items can effectively reduce greenhouse gas (GHG) emissions. Whether or not these requirements will reduce emissions effectively enough to mitigate the county's contribution to GHGs is unknown. The only entities which have jurisdiction over vehicle emissions in California are the state or federal government. Therefore, until such time that there are thresholds of significance to which the county's GHGs contribution can be compared, it must be assumed that any increase in GHGs will lead to a change in climate.

(6) Impact 5.0.5: The impacts of global climate change would cumulatively result in the potential decrease in water supply, increase in air pollutants, and increase in health hazards. The contribution of the proposed General Plan Update to this impact is considered cumulatively considerable. Even with implementation of the air quality related policies and action items of the proposed General Plan Update Resource Management Element this impact would remain significant, and there are no other feasible mitigation measures or alternatives that would reduce this impact to a less than significant level.

(b) Biological Resources:

(1) Impact 4.4.2: Subsequent land uses activities and growth under the proposed General Plan Update could have a substantial adverse effect on any wetlands, riparian, or other sensitive biotic community or native habitat within the county. Even with implementation of Mitigation Measures MM 4.4.2a and 4.4.2b, which are incorporated into the proposed General Plan Update as policies in the Resource Management Element, this impact would remain significant, and there are no other feasible mitigation measures or alternatives that would reduce this impact to a less than significant level.

(2) Impact 5.0.6: Subsequent land use activities associated with implementation of the proposed General Plan Update, in combination with existing, approved, proposed, and reasonably foreseeable development, would substantially contribute to cumulative impacts associated with significant effects to special-status plant and wildlife species, sensitive natural communities, and movement corridors. The impact to sensitive biotic communities would be cumulatively considerable. Even with implementation of Mitigation Measures MM 4.4.1 a, 4.4.1 b, 4.4.2a, 4.4.2b, and 4.4.3 which are incorporated into the proposed General Plan Update as policies in the Resource Management Element (as noted above), this impact would remain significant, and there are no other feasible mitigation measures or alternatives that would reduce this impact to a less than significant level.

(c) Hydrology and Water Quality:

(1) Impact 4.8.4: Subsequent land use activities associated with implementation of the proposed General Plan Update may increase the demand for water from groundwater sources and could thus result in overdraft. Even with implementation of the proposed General Plan policies and action items relating to groundwater resources, this impact would remain significant, and there are no other feasible mitigation measures or alternatives that would reduce this impact to a less than significant level.

(2) Impact 5.0.13: Subsequent land use activities associated with implementation of the proposed General Plan Update, in combination with existing, approved, proposed, and

reasonably foreseeable development in the region, would contribute to the drawdown of underlying aquifers and decreased recharge in the North Coastal Basin. This impact is considered cumulatively considerable. Even with implementation of the proposed General Plan policies and action items relating to groundwater resources, this impact would remain significant, and there are no other feasible mitigation measures or alternatives that would reduce this impact to a less than significant level.

(d) Noise:

(1) Impact 5.0.16: Subsequent land use activities associated with implementation of the proposed General Plan Update, along with existing, approved, proposed, and reasonably foreseeable development in the region, could result in increased traffic noise conflicts. This is considered a cumulatively considerable impact. Even with implementation of proposed General Plan policies addressing noise impacts, this impact would remain significant, and there are no other feasible mitigation measures or alternatives that would reduce this impact to a less than significant level.

(e) Public Services:

(1) Impact 4.12.1.1: Subsequent land use activities associated with implementation of the proposed General Plan Update may increase the demand for fire protection and emergency medical services and facilities. Even with implementation of General Plan policies and action items as well as Section 8.80.020 and Chapter 9.05 of the Mendocino County Code, this impact would remain significant, and there are no other feasible mitigation measures or alternatives that would reduce this impact to a less than significant level.

(2) Impact 5.0.18: Subsequent land use activities associated with implementation of the proposed General Plan Update, in combination with existing, approved, proposed, or reasonably foreseeable development in the county, would increase development and population and contribute to the cumulative demand for fire protection and emergency medical services. This is considered a cumulatively considerable impact. Even with implementation of the proposed General Plan policies and action items relating to fire protection and emergency medical services, this impact would remain significant, and there are no other feasible mitigation measures or alternatives that would reduce this impact to a less than significant level.

(3) Impact 4.12.2.1: Subsequent land use activities associated with implementation of the proposed General Plan Update may result in increased demand for law enforcement services, potentially resulting in the need for additional law enforcement personnel and related facilities. This is considered a potentially significant impact. Even with implementation of proposed General Plan policies and action items relating to law enforcement services, this impact would remain significant, and there are no other feasible mitigation measures or alternatives that would reduce this impact to a less than significant level.

(4) Impact 5.0.19: Subsequent land use activities associated with implementation of the proposed General Plan Update, in combination with existing, approved, proposed, or reasonably foreseeable development in the county, would contribute to the cumulative demand for additional law enforcement services and facilities. Even with implementation of proposed General Plan policies and action items relating to law enforcement services, this impact would remain significant, and there are no other feasible mitigation measures or alternatives that would reduce this impact to a less than significant level.

(f) Transportation and Circulation

(1) Impact 4.13.1: Subsequent land use activities in the county could result in additional traffic on area highways, which could exceed level of service standards. Implementation of the proposed General Plan Update would contribute to this impact. Even with implementation of proposed General Plan policies and action items relating to traffic, this impact would remain significant, and there are no other feasible mitigation measures or alternatives within the authority of the County that would reduce this impact to a less than significant level.

(2) Impact 5.0.22: Subsequent land use activities associated with implementation of the proposed General Plan Update, in combination with existing, approved, proposed, and reasonably foreseeable development in the county, would result in cumulative traffic impacts on area highways. This is considered a cumulatively considerable impact. Even with implementation of proposed General Plan policies and action items relating to traffic, this impact would remain significant, and there are no other feasible mitigation measures or alternatives within the authority of the County that would reduce this impact to a less than significant level.

(g) Utilities and Service Systems

(1) Impact 4.14.1.1: Subsequent land use activities associated with implementation of the proposed General Plan Update could require additional water supplies, storage capacity, and treatment and conveyance facilities to adequately serve subsequent development. Even with implementation of the service system related policies and action items of the proposed General Plan Update Resource Management Element and Development Element, this impact would remain significant, and there are no other feasible mitigation measures or alternatives that would reduce this impact to a less than significant level.

(2) Impact 5.0.23: Subsequent land use activities associated with implementation of the proposed General Plan Update, in combination with existing, approved, proposed, or reasonably foreseeable development in the North Coastal Basin, may contribute to the cumulative demand for water supplies and associated facilities. This is considered a cumulatively considerable impact. Even with implementation of the service system related policies and action items of the proposed General Plan Update Resource Management Element and Development Element, this impact would remain significant, and there are no other feasible mitigation measures or alternatives that would reduce this impact to a less than significant level.

The Statement of Overriding Considerations found that the benefits of the project outweigh the significant impacts due to the following considerations:

(a) Environmental.

(1) The Project incorporates all feasible mitigation measures to reduce potential environmental impacts to the greatest extent feasible.

(2) The Project reiterates and reinforces the County's commitments to protection of agriculture as a basic industry important to the economy and quality of life and food security of the county by maintaining extensive agricultural land areas and limiting incompatible uses.

(3) The General Plan recognizes the wide range of County natural systems, open spaces and recreational opportunities by protecting and enhancing resources. Consistent with this approach, development opportunity is focused in community areas that will support more compact urban development patterns, where such development can be supported by necessary infrastructure and public services, agriculture and open space are preserved, and energy is conserved, all of which reduce congestion and greenhouse gas emissions and improve air quality.

(4) The Project supports ecologically sustainable agricultural operations and protection and enhancement of important natural resources through encouraging research, vegetation management programs, best management practices, and technical assistance for agricultural operators while encouraging farmers, land owners and property managers to protect sensitive environments, and minimize the effects of recreation, tourism, agriculture and development on these resources.

(5) The Project includes goals, objectives, and policies that provide additional protection of the County's important natural resources, such as water resources, biotic resources, freshwater and marine environments, scenic resources, timber and agricultural resources. The General Plan contains a comprehensive set of policies and actions (located in the Resource Management Element), which seek to address how Mendocino County manages water supply and quality issues. Key among these recommendations is the need to gather more information to supplement what is already known about water supplies so that future decisions will be based on the best knowledge available. The Project protects and enhances the county's natural ecosystems and valuable resources through prevention of loss of the county's biological resources and fragmentation of oak woodlands, forests, and wildlands and preservation of their economic and ecological values and benefits.

(6) The General Plan includes new policies and programs for climate protection and sustainability and commits the County to being proactive in monitoring and addressing climate change. Directing new growth into incorporated cities and established communities and increasing bike, pedestrian and transit systems will help lower transportation related GHG emissions. Improving building energy efficiency standards and promoting the use of renewable sources (wind, sun, thermal) will lower emissions as well as consumption of fossil fuels.

(7) The Project provides updated General Plan policies that protect water resources. The County will work with agencies in developing long-term water supplies to meet the growth needs planned in this General Plan. Updated General Plan policies recognize the importance of water conservation as part of a sustainable management plan.

(8) The Project includes goals, policies and programs to reduce energy and resource consumption by promoting solid waste reduction, reuse, recycling, composting and environmentally safe transformation of waste, educating businesses and residents on options for implementing waste reduction targets, encouraging "green building" design, development and construction, and evaluating new technologies for energy generation and conservation and solid waste disposal as they become available.

(b) Economic and Fiscal.

(1) The Project focuses on the long term relative to creation of permanent jobs for local residents, consistent with each community planning area's vision for development. Creation of new employment opportunities will be balanced with protection of the environment and natural resources, with the goal of developing new businesses that utilize sustainable systems. Agricultural and timber-based operations are to be protected. Expansion of the tourism industry and County recreational activities will be encouraged.

(2) The Project emphasizes long-term and sustainable economic and community needs over short-term gains by promoting sustainable and innovative business practices and technologies that advance work force and community health, environmental protection, and use of clean, reliable and renewable energy sources.

(3) The Project facilitates a variety of land uses and employment opportunities in community areas, consistent with local community needs and environmental constraints and promotes diversified employment opportunities in the industrial sector and agricultural processing operations. In all instances, the General Plan promotes and encourages land uses that incorporate environmentally sound practices.

(4) The Project creates opportunity for new commercial development by designating sufficient lands for commercial use, including an emphasis on mixed-use development. Additionally, policies call for business retention, expansion and diversification, with an emphasis on compatibility between land uses by requiring the use of buffers and setbacks, reducing the potential for environmental and other impacts and protecting natural resources.

(5) The Project recognizes the importance and value of agricultural production and the wine industry's annual economic contribution. According to the 2006 Mendocino County Crop Report the total value of agricultural production, excluding timber, was approximately $136.7 million. Agriculture has a significant role in the Mendocino County economy, which supports a growing tourism and hospitality industry, increases tax revenue and provides employment opportunities.

(c) Social.

(1) The Project includes policies, goals, and objectives which conform to the County's longstanding growth history, defining a rate of population growth that perpetuates County residents' quality of life.

(2) The Project best reflects the community's expressions of quality of life and community values and guides the County's future growth in line with those values. The Project supports a balance between agriculture, housing, environmental preservation and restoration, population growth and economic development. Planning efforts will emphasize local culture, reflecting the historic, physical, and social values of each community. This will be accomplished, in part, through the eventual adoption of community design guidelines for physical factors and sustainable development practices.

(3) The Project reflects the County's commitment to the health and well-being of all its residents, and the General Plan land use plans, policies and programs are designed to promote health through promoting an active, inclusive county, where healthy habits are encouraged rather than discouraged by the built environment. The policies also emphasize development of walkable communities.

(4) The Project development pattern policies provide for new development in the county's community planning areas, where infrastructure and public services are available. In these areas, compact forms of development will be emphasized, using infill and redevelopment of underutilized sites. This approach will create better-defined urban boundaries, minimizing urban sprawl and preserving the predominantly rural character of the county.

(5) The Project emphasizes local culture, reflecting the historic, physical, and social values of each community. This will be accomplished, in part, through the eventual adoption of community design guidelines for physical factors and sustainable development practices.

(6) The Project encourages coordination and partnering with the cities in Mendocino County is encouraged to develop appropriate land use patterns at the city/county interface, minimize environmental and economic impacts, and maximize environmental and economic benefits.

(7) The Project protects the wide range of historic, cultural, and archaeological resources through a variety of actions, including working closely with the County Museum, Native American Tribes, other organizations, and agencies. New development projects will be evaluated for potential impact to cultural resources. The County will consider adoption of a historical review code as an additional means of ensuring protection of historic resources.

(8) The Project incorporates a wide range of policy approaches addressing transportation needs. Primary among these is an emphasis on multiple modes of transportation, rather than focusing solely on vehicular transportation, while stressing community livability. Emphasis is placed on improving and maintaining existing roadway systems and bridges,

as opposed to construction of new roadways. This emphasis is in keeping with other General Plan policies that focus new development in the county's community areas. The County will also support programs intended to reduce the number and extent of vehicle trips by working with major employers, supporting carpool and vanpool facilities and incentive programs reducing single-occupant vehicle use. Policies in this Element provide for expanded pedestrian and bicycle systems in support of improved community livability. Connecting or expanding the county's system of pedestrian, bicycle, and trail routes is emphasized, as is providing improved linkages between modes of transportation. New development will be required to construct or support pedestrian and bicycle systems.

(9) The Project establishes a wide range of parks and recreational opportunities for county residents. The policies call for a needs assessment of parks and recreation, followed by actions to provide needed facilities incorporating multiple uses of parks and school facilities and open spaces in urban communities. The County will work closely with local agencies and school districts in developing its parks and recreation plans and programs. With an emphasis on community livability, policies call for development of trails and bicycle lanes and paths throughout the county.

(10) This General Plan recognizes the need and importance of providing adequate law enforcement services for the county, calling for regulation of development patterns and designs as a means of ensuring public safety, working with law enforcement agencies as part of the development process, and maintaining adequate development codes enforcement capabilities.

(d) Housing.

(1) The State of California has made the attainment of decent housing and a suitable-living environment for every Californian a statewide priority. As set forth in Government Code section 65580, the County of Mendocino must facilitate the improvement and development of housing to make adequate provision for the housing needs of all economic segments of the community. Similarly, CEQA recognizes the importance of balancing the prevention of environmental damage with the provision of a "decent home and satisfying living environment for every Californian." (See Public Resources Code section 21000(g).) The proposed 2009 GPU sets forth the County's long-range plan for meeting regional housing needs, during the present and future housing cycles, while balancing environmental, economic, and fiscal factors and community goals.

(2) The County is obligated under state law to assume its fair share of regional growth, particularly housing for all income levels. The Project accommodates this obligation while at the same time minimizing impacts by concentrating growth in areas where urban services are available. The 2009 GPU also outlines a variety of strategies for the County to use to address its long-term housing needs and to meet state and regional housing requirements.

(3) The Project intent is to provide a range of flexibility in how the General Plan is implemented, through updates to the Zoning Ordinance and other development codes. Similarly, flexibility in development standards helps implement the Housing Element.

(e) Legal and Regulatory.

(1) The Project provides for cooperative planning between the County and the four incorporated cities in the county, numerous other state and federal jurisdictions, and private and non-profit sectors to provide needed services and facilities such as housing, transportation, economic development, parks and recreation, open space and other needed services and infrastructure to County residents.

(2) The Project balances the protection of ecologically sensitive resources with the protection of property rights, the importance of agriculture and the need for affordable housing, transportation, and economic growth. The Project represents the best compromise in

terms of satisfying the County's obligations to social, environmental, and housing considerations, all within the constraints of the County's limited budget.

(3) The Project ensures that private property owners will continue to have economically viable use of their lands, promotes economic development, spreads the public burdens fairly, and protects the County from regulatory takings challenges.

(4) The Project is consistent with the rule that, in mitigating or avoiding a significant effect on the environment, a public agency may exercise only those express or implied powers provided by law other than the California Environmental Quality Act. (See Public Resources Code section 21004.)

1.3 PROJECT SUMMARY

The project proposes the addition of 8 policies and 1 action item to the section of Chapter 6 discussing the community of Redwood Valley. Additionally, one existing policy is proposed to be updated to reflect development that has occurred since the previous General Plan was adopted, and a number of minor changes to the chapter are proposed including text corrections and re-numbering. The policy updates are intended to reflect the goals of the community of Redwood Valley and do not permit additional development beyond that which has already been analyzed by the General Plan EIR. The individual policies and associated discussion are provided in the associated staff report (GP 2024-0001).

1.4 APPROACH TO CEQA ANALYSIS

In the case of an application requiring discretionary approval on a project for which an EIR has been certified, the California Environmental Quality Act (CEQA) requires the lead agency to determine whether a supplemental or subsequent EIR is required. The requirement is codified in Public Resources Code section 21166 and CEQA Guidelines Section 15162. Section 15162 provides guidance in this process by requiring an examination of whether, since the certification of the EIR and approval of the project, changes in the project or conditions have been made to such an extent that the proposal may result in substantial changes in physical conditions that are considered significant under CEQA. If so, the County would be required to prepare a subsequent EIR or supplement to the EIR.

The following review examines the proposed updates to the General Plan in accordance with Section 15162. The evaluation concludes that the conditions set forth in Section 15162 are not present, and that an Addendum to the EIR is the appropriate CEQA document pursuant to CEQA Guidelines Section 15164.

Each of the following standards, as set forth in Section 15162(a), are addressed in this Addendum.

1) Are substantial changes 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) Have substantial changes occurred 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?

3) Is there new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, that 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 (or negative declaration);

    (c) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

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

Pursuant to CEQA, this Addendum evaluates the proposed amendments to Chapter 6 of the General Plan to determine whether circumstances are present that could require a supplemental environmental document. Based on the Addendum, County staff recommends that: (a) the impacts of the proposed amendments to Chapter 6 are within the scope of those analyzed in the General Plan EIR that was reviewed and certified by the County; (b) no changes are required to the General Plan EIR, and (c) the General Plan EIR provides a sufficient and adequate analysis of the environmental impacts of the proposed amendments.

2. CEQA Analysis for General Plan EIR

2.1 "SUBSTANTIAL CHANGES IN THE PROJECT" STANDARD

Pursuant to Section 15162(a)(1) of the CEQA Guidelines, this section presents a discussion of whether substantial changes are proposed which will require major revisions of the General Plan EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

The General Plan contains policies related to development, resource management, housing, the community, and coastal resources. The General Plan is primarily designed to be self-mitigating by incorporating policies and implementation measures that address and mitigate related environmental impacts, such as zoning codes and design standards.

The proposed project would update a portion of the Community Specific Policies chapter of the General Plan to incorporate policy recommendations developed by the RVMAC. The proposed project does not alter the requirements or policies analyzed in the General Plan EIR. The proposed project consists of updated text, inclusion of graphics, language clarifications, and improved format. The clarifications made to Chapter 6 consist of graphic additions, language clarifications, and updates to goals and policies that have no potential for impacts on the environment as they are solely providing greater guidance on future development review and are administrative in nature. Staff has reviewed the proposed policies and determined them to be consistent with existing policies and goals of the General Plan, as required by government code §65300.5. Further analysis of the individual policies is provided in the project staff report. The term "project" as defined in CEQA Guidelines Section 15378 specifically excludes "[o]rganizational or administrative activities of governments that will not result in direct or indirect physical changes in the environment."

Because the proposed changes would not result in a physical impact, the proposed project's impacts would be no more substantial than analyzed in the General Plan EIR.

2.2 "SUBSTANTIAL CHANGES IN THE CIRCUMSTANCES" STANDARD

Pursuant to Section 15162(a)(2) of the CEQA Guidelines, this section presents a discussion of whether changes to the project site or the vicinity have occurred subsequent to the certification of the General Plan EIR that would result in new significant impacts or a substantial increase in the severity of a previously identified significant impact.

No substantial changes have occurred within the County since the certification of the 2009 General Plan EIR. Development in the region has occurred at a slower pace than anticipated in the General Plan EIR. Based on the environmental baseline identified in the General Plan EIR, the physical changes in the county that have occurred are consistent with the analysis of the General Plan EIR and the cumulative projects considered in the General Plan EIR. There have been no substantial changes in the circumstances of the county as considered in the General Plan EIR.

2.3 "NEW INFORMATION OF SUBSTANTIAL IMPORTANCE" STANDARD

Pursuant to Section 15162(a)(3) of the CEQA Guidelines, this section includes a discussion of whether the Modified Project would result in 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. New information of substantial importance includes: (1) one or more significant effects not discussed in the previous EIR; (2) significant effects previously examined that are substantially more severe than shown in the previous EIR; (3) mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or (4) mitigation measures or alternatives that are considerably different from those analyzed in the previous EIR and that would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

No new information of substantial importance has been identified that was not known or could have been known at the time of certification of the previous EIR that shows the zoning code update will have one or more significant effects not discussed in the previous EIR. As discussed in the subsequent section, no significant effects previously examined are substantially more severe than shown in the previous EIR. The Mendocino County Board of Supervisors determined all mitigation measures in the 2009 General Plan EIR to be feasible and as a result all were adopted as goals, policies, or action items in connection with the 2009 General Plan Update. No new mitigation measures are recommended.

2.4 ENVIRONMENTAL REVIEW

The Mitigation Monitoring and Report Program adopted for the General Plan EIR identifies Mitigation Measures in the following potential impact categories: Biological Resources, Cultural Resources, and Noise.

Biological Resource Mitigation Measures 4.4.1a through 4.4.3 were addressed within the Resource Management Element of the General Plan. None of the proposed updates to the Community Specific Policies have the potential to alter any existing protections for biological resources including wetlands, oak woodlands, sensitive biotic communities, or any other “sensitive resources”. No new mitigation measures are necessary as a result of the proposed amendments as all potential impacts were previously analyzed under the General Plan EIR.

Cultural Resource Mitigation Measures 4.5.1 and 4.5.2 were addressed within the Development Element of the General Plan. None of the proposed updates to the Community Specific Policies have the potential to alter any existing protections or requirements for cultural resources. No new mitigation measures are necessary as a result of the proposed amendments as all potential impacts were previously analyzed under the General Plan EIR.

Noise Mitigation Measure 4.10.1 was addressed within the Development Element of the General Plan. None of the proposed amendments alter any existing noise provisions. Appendix C, which contains exterior noise limit standards, remains unchanged.