



# 2023-2031 Housing Element Update

## Addendum Evaluation State Clearinghouse # 2013082037

*prepared by*

**City of Cotati**

Community Development Department  
201 West Sierra Avenue  
Cotati, California 94931

Contact: Noah Housh, Director of Community Development

*prepared with the assistance of*

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Oakland, California 94612

**March 2023**



**RINCON CONSULTANTS, INC.**

Environmental Scientists | Planners | Engineers

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# Acronyms and Abbreviations

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AB	Assembly Bill
ABAG	Association of Bay Area Governments
ADU	accessory dwelling unit
AMI	Area Median Income
BAAQMD	Bay Area Air Quality Management District
CAPCOA	California Air Pollution Control Officers Association
CEQA	California Environmental Quality Act
CCR	California Code of Regulations
EIR	Environmental Impact Report
FHSZ	Fire Hazard Severity Zone
GHG	greenhouse gas
HCD	California Department of Housing and Community Development
LOS	level of service
RHNA	Regional Housing Needs Assessment
SB	Senate Bill
SOI	Sphere of Influence
SR	State Route
TCAC	Tax Credit Allocation Committee

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# 1 Introduction and Project Summary

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## 1.1 Project Title

City of Cotati 2023-2031 Housing Element Update

## 1.2 Lead Agency/Project Sponsor Name and Address

City of Cotati  
Community Development Department  
201 West Sierra Avenue  
Cotati, California 94931

## 1.3 Contact Person and Phone Number

Noah Housh, Director of Community Development  
(707) 665-3635

## 1.4 Project Location

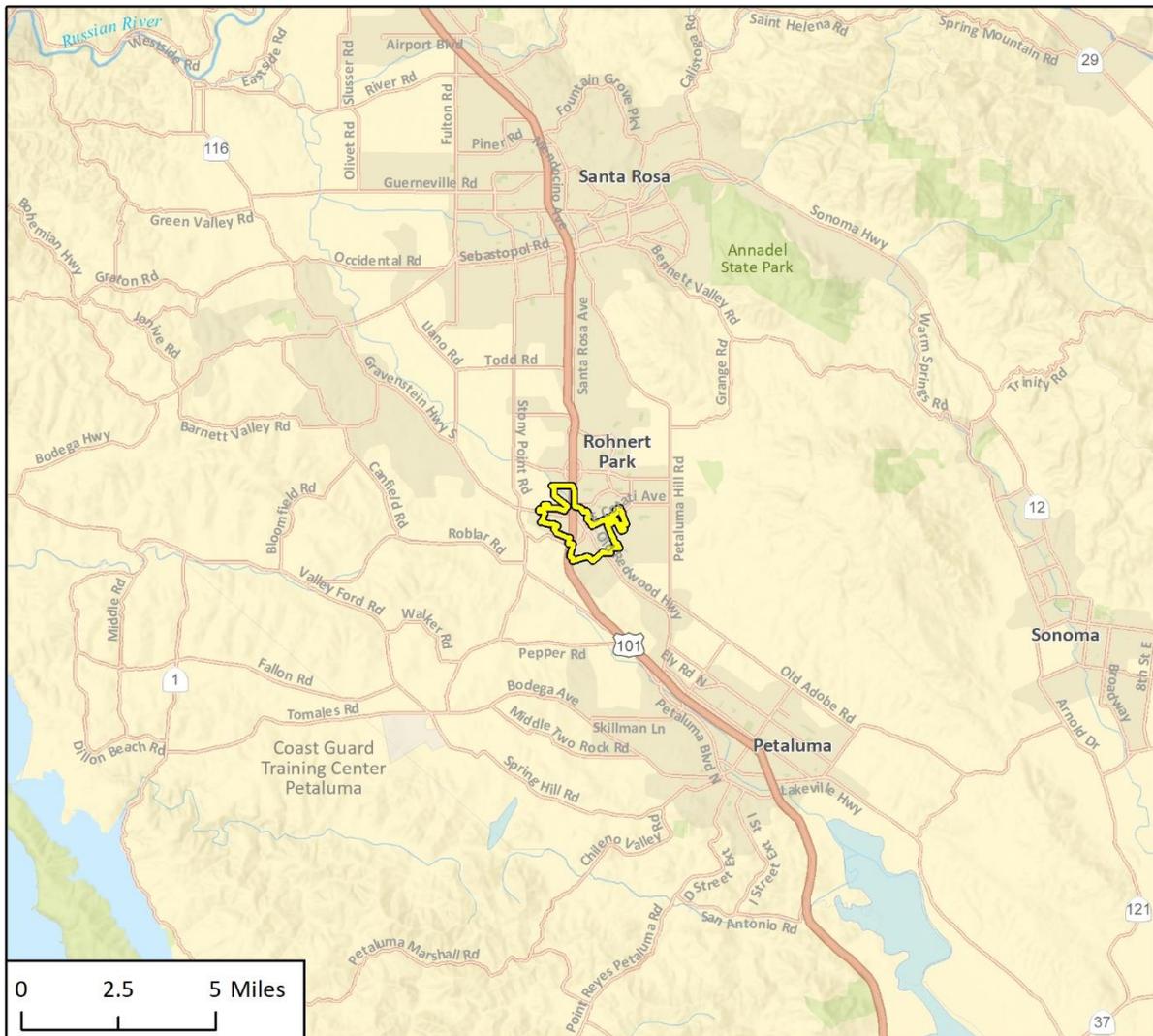
The City of Cotati (City) is located in Sonoma County, approximately 17 miles east of the Pacific Ocean, 40 miles north of San Francisco, and 7 miles south of Santa Rosa. The city is north of Petaluma, south of Rohnert Park, and west of the Sonoma Mountains. Much of the city is situated along U.S. Highway 101 (US 101), with State Route 116 (SR 116) entering the city from the northwest. The Housing Element Update's planning boundaries include all land within the Cotati city limits, as shown in Figure 1.

## 1.5 Project Description

The project consists of a comprehensive update to the City of Cotati 2023-2031 Housing Element Update (herein referred to as "Housing Element update" or "project"). The City's General Plan underwent extensive environmental review in the form of an Environmental Impact Report (EIR), which was certified in 2015. The EIR for the Cotati General Plan is a comprehensive document and includes discussion of alternatives and growth-inducing impacts associated with urban development in the city at the time it was developed.

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

**Figure 1 Regional Project Location**



Imagery provided by Esri and its licensors © 2022.  
 Cotati quadrangle. T06N R08W S25-27,34-36.

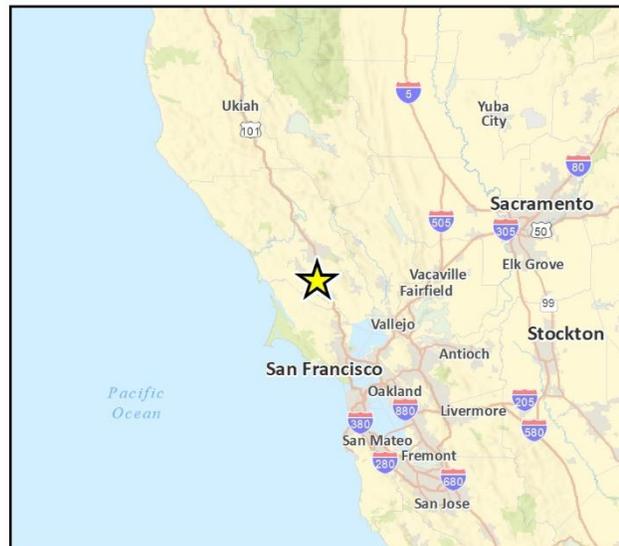


Fig 1 Regional Location

The project would bring the City's Housing Element into compliance with State legislation passed since the publication of the previous (5<sup>th</sup> cycle) Housing Element (adopted in 2015). The Housing Element update includes a housing sites inventory (Section 3 and Appendix D of the Housing Element) that demonstrates how the City plans to meet its 6<sup>th</sup> cycle RHNA. However, no formal land use changes, rezoning, or physical development are proposed as part of the Housing Element update.

The Housing Element update establishes objectives and policies designed to guide future development as the City works to achieve State-mandated housing goals. Future development will require project-specific developmental review as potential impacts are location-specific and cannot be assessed in a meaningful way until a project site and development proposal are identified. When a specific development proposal is considered for approval, that project would be subject to adopted development guidelines/standards and it must incorporate applicable mitigation measures developed in the General Plan EIR (in accordance with *CEQA Guidelines* Section 15168[c][3]). If a subsequent activity (in this case a specific development proposal) would have effects not identified in the certified EIR (the General Plan EIR and this Addendum), the City must prepare additional environmental documentation to comply with CEQA.

This Addendum, therefore, analyzes the changes and potential impacts related to the adoption of Housing Element update. This Addendum is intended to demonstrate consistency of the Housing Element update with the existing General Plan EIR to comply with CEQA. In particular, and in line with Public Resources Code Section 21083.3, this Addendum assesses whether the Housing Element update, as a policy and programs document, includes impacts not addressed or previously analyzed in the General Plan EIR.

## 1.6 Discretionary Action

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

- Adoption of the updated Housing Element and General Plan Amendment

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

## 1.7 Prior Environmental Document(s)

City of Cotati, General Plan Update Environmental Impact Report (General Plan Update EIR). State Clearinghouse Number 2013082037, certified March 2015.

## 1.8 Location of Prior Environmental Document(s)

City of Cotati, Planning Department Website: <http://cotati.generalplan.org/content/environmental-documents/index.html>

## 2 Project Context

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

### 2.1 Purpose of the Housing Element

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

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

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

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

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

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

### 2.2 Updates to the Housing Element

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

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

## 2.3 Regional Housing Needs Allocation

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

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

Income Group	Cotati Unit Needs	Percent of Total Units	Regional Unit Needs (ABAG)	Percent of Regional Units
Very low ( $\leq$ 50% AMI)	60	25.6%	114,442	25.9%
Low (> 50-80% AMI)	34	14.5%	65,892	14.9%
Moderate (>80-120% AMI)	39	16.7%	72,712	16.5%
Above Moderate (>120% AMI)	101	43.2%	188,130	42.6%
<b>Total</b>	<b>234</b>	<b>100.0%</b>	<b>441,176</b>	<b>100.0%</b>

AMI = Area Median Income (established annually by the Department of Housing and Urban Development)  
Source: ABAG 2022

The City had 3,215 households as of January 2022. Throughout the city, approximately 65 percent of housing units were single-family, including approximately 46 percent single-family detached units and approximately 19 percent single-family attached units; multi-family dwelling units comprised approximately 32 percent of the city's housing stock; and the remaining approximately 4 percent were mobile homes (California Department of Finance 2022).

## 2.4 Changes in State Law

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

- Affordable Housing Streamlined Approval Process: Senate Bill 35 (2017)
- Additional Housing Element Sites Analysis Requirements: Assembly Bill 1397 (2017)
- Affirmatively Furthering Fair Housing: Assembly Bill 686 (2017)
- No-Net-Loss Zoning: Senate Bill 166 (2017)
- By Right Transitional and Permanent Supportive Housing: Assembly Bill 2162 (2018)
- Housing Crisis Act of 2019: Senate Bill 330
- Standardization of Sites Inventory Analysis and Reporting: Senate Bill 6 (2019)

- California Housing Opportunity and More Efficiency (HOME) Act: Senate Bill 9 (2022)
- Senate Bill 10 (2022)

## 2.5 City of Cotati General Plan

State law mandates that each city and county in California adopt "a comprehensive, long-term general plan," for the physical development of its planning area. The Cotati General Plan planning area includes all lands within the city limits and Sphere of Influence (SOI). The purpose of the General Plan is to plan for important community issues such as new growth, housing needs, and environmental protection. Furthermore, the General Plan is used to project future demand for services such as sewer, water, roadways, parks, and emergency services.

The Cotati General Plan, adopted in March 2015, is a long-term document which identifies the community's vision for the future and provides a framework that will guide decisions on growth, development, and conservation of open space and resources in a manner that is consistent with the quality of life desired by the city's residents and businesses.

The General Plan policy document contains the goals and policies that will guide future decisions within the city and identifies action items (implementation measures) to ensure the vision and goals of the General Plan are carried out. The General Plan also contains a revised Land Use Map, which serves as a general guide to the distribution of land uses throughout the city.

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

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

## 2.6 Cotati General Plan EIR

The City of Cotati General Plan Update EIR (herein called the General Plan EIR) addressed the potential environmental effects of the planned buildout of Cotati through the 20-year period and concluded that implementation of the General Plan would result in environmental impacts as detailed in Table 2. Actions and policies were incorporated into the General Plan EIR to reduce potential impacts from project development under the General Plan.

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

<b>Issue Area</b>	<b>Level of Significance after Mitigation</b>	<b>Mitigation Proposed in the General Plan EIR</b>
Aesthetics and Visual Resources	Significant and Unavoidable	Mitigated to the greatest extent feasible through General Plan policies and actions. No additional feasible mitigation is available.
Air Quality	Less than Significant	General Plan policies and actions mitigate this impact to a less than significant level
Biological Resources	Less than Significant	General Plan policies and actions mitigate this impact to a less than significant level
Cultural Resources	Less than Significant	General Plan policies and actions mitigate this impact to a less than significant level
Geology and Soils	Less than Significant	General Plan policies and actions mitigate this impact to a less than significant level
Greenhouse Gases and Climate Change	Less than Significant	General Plan policies and actions mitigate this impact to a less than significant level
Hazards and Hazardous Materials	Less than Significant	General Plan policies and actions mitigate this impact to a less than significant level
Hydrology and Water Quality	Less than Significant	General Plan policies and actions mitigate this impact to a less than significant level
Land Use, Agriculture, and Population	Less than Significant	General Plan policies and actions mitigate this impact to a less than significant level
Noise	Significant and Unavoidable	Mitigated to the greatest extent feasible through General Plan policies and actions. No additional feasible mitigation is available.
Public Services and Recreation	Less than Significant	General Plan policies and actions mitigate this impact to a less than significant level
Transportation and Circulation	Significant and Unavoidable	Mitigated to the greatest extent feasible through General Plan policies and actions. No additional feasible mitigation is available.
Utilities	Significant and Unavoidable	Mitigated to the greatest extent feasible through General Plan policies and actions. No additional feasible mitigation is available.
Cumulative/Other CEQA-Required Topics	Significant and Unavoidable	Mitigated to the greatest extent feasible through General Plan policies and actions. No additional feasible mitigation is available.

Source: City of Cotati 2014

## General Plan Assumptions

The General Plan buildout analysis assumes a 20-year horizon to the year 2035. The General Plan will accommodate future growth in Cotati, including new businesses, expansion of existing businesses, and new residential uses.

The General Plan EIR addresses two buildout scenarios to evaluate the maximum projected development that could occur within city limits under the proposed general plan and the maximum projected development that could occur within the entire planning area. As shown in Table 2-3 on page 2.0-10 of the General Plan EIR, the General Plan could yield up to 1,541 new housing units within the city limits which would increase the population within city limits by approximately 3,775 units and result in approximately 6,766 employment opportunities. Full buildout conditions in the

entire planning area, as shown in Table 2-4 on page 2.0-11, could yield 2,140 new housing units resulting in a population growth of approximately 5,243 residents and approximately 8,819 new employment opportunities in the city and SOI. It should be noted that the SOI is not included in the Housing Element update.

## 2.7 Housing Element Update

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

- **Section I: Introduction and Summary:** introduces the overall Housing Element update effort, a summary of housing needs and constraints, a Fair Housing summary, and a review of the effectiveness of the 2015 Housing Element and the City's progress in its implementation.
- **Section II: Housing Strategy:** sets forth the City's Housing Strategy, which is comprised of the Goals, Policies, and Programs that it intends to implement over the next 8-year planning cycle. The City's Quantified Objectives are also included in this section.
- **Section III: Housing Sites:** presents a detailed Housing Site Inventory, including a discussion of the availability of services, and compares this inventory to the City's projected housing needs.
- **Section IV: Technical Background Report:** provides statutorily required data including an assessment of housing needs and programs, an analysis of nongovernmental and governmental constraints to affordable housing provision, a discussion of special needs populations, and an assessment of fair housing. Pre-certified housing and demographic data provided by ABAG is included here.

### Goals, Policies, and Programs

The primary objective of the Housing Element is to encourage the production of new housing units to meet the RHNA and housing for special needs populations. This is done by adopting a series of policies and programs which aim to conserve and improve existing housing stock; expand affordable housing opportunities; provide adequate sites and funding to accommodate housing needs of all economic segments of the community; promote housing opportunities for all persons regardless of race, gender, age, marital, status, ancestry, national origin, color, or sexual orientation; and ensure public participation in the development of the City's housing policies. The Housing Element update goals, policies, and programs are summarized below and referenced throughout this Addendum as appropriate.

#### *Goal H-1: Resilient & Safe Housing*

The City's goal to conserve and improve the existing housing supply to provide adequate, safe, and decent housing for all Cotati residents is supported by policies that encourage housing rehabilitation and preservation, assist with homeownership opportunities, enforce local building codes, encourage development of accessory dwelling units, expand energy and water efficiency, seek funding to support programs, and facilitate resident awareness of assistance programs.

#### *Goal H-2: Housing Production*

The City's goal to provide adequate sites to accommodate the housing needs of all economic segments of the community is supported by policies that ensure adequate land designated for residential or mixed-use development is available to meet the RHNA, ensure that public infrastructure accommodates the City's fair share of regional housing needs, encourage mixed use

development, facilitate and encourage the construction of accessory dwelling units, encourage housing development on infill sites, and assist in the development of affordable housing.

*Goal H-3: Affordable, Attainable & Accessible Housing*

The City's goal to expand affordable housing opportunities for lower income households and persons with special housing needs, including seniors, disabled persons, developmentally disabled persons, and homeless persons and families is supported by policies that incentivize discretionary affordable housing development and lower income housing, provide density bonuses to eligible projects, encourage housing for large and intergenerational families, eliminate barriers to safe and accessible housing for people with disabilities, and facilitate linkages for at-risk individuals and families to organizations and service groups that provide support services.

*Goal H-4: Affirmatively Furthering Fair Housing*

The City's goal to promote housing opportunities for all persons regardless of race, gender, age, marital status, ancestry, national origin, color, or sexual orientation is supported by a policy that works to eliminate unlawful discrimination in housing.

*Goal H-5: Community Engagement*

The City's goal to ensure public participation in the development of the city's housing policies is supported by a policy that encourages and facilitates public participation in the formulation and review of the City's housing and development policies.

### 3 Overview of CEQA Guidelines Section 15164 and Section 15162

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

*CEQA Guidelines* Section 15164 states that a lead agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary, but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred. *CEQA Guidelines* Section 15162(a) states that no Subsequent or Supplemental EIR shall be prepared for a project with a certified EIR unless the lead agency determines, based on substantial evidence in the light of the whole record, one or more of the following:

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

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

The City has prepared this Addendum Evaluation, pursuant to *CEQA Guidelines* Sections 15162 and 15164, to evaluate whether the project's environmental impacts are covered by and within the scope of the 2013 Cotati General Plan Update Final EIR (November 2014, State Clearinghouse Number 2013082037). The following Addendum Evaluation details any changes in the project,

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

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

## 4 Environmental Effects and Determination

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

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

■ NONE

- |  |   |   |
|--|---|---|
| <input type="checkbox"/> Aesthetics                | <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Air Quality                        |
| <input type="checkbox"/> Biological Resources      | <input type="checkbox"/> Cultural Resources                 | <input type="checkbox"/> Energy                             |
| <input type="checkbox"/> Geology/Soils             | <input type="checkbox"/> Greenhouse Gas Emissions           | <input type="checkbox"/> Hazards & Hazardous Materials      |
| <input type="checkbox"/> Hydrology/Water Quality   | <input type="checkbox"/> Land Use/Planning                  | <input type="checkbox"/> Mineral Resources                  |
| <input type="checkbox"/> Noise                     | <input type="checkbox"/> Population/Housing                 | <input type="checkbox"/> Public Services                    |
| <input type="checkbox"/> Recreation                | <input type="checkbox"/> Transportation                     | <input type="checkbox"/> Tribal Cultural Resources          |
| <input type="checkbox"/> Utilities/Service Systems | <input type="checkbox"/> Wildfire                           | <input type="checkbox"/> Mandatory Findings of Significance |

### 4.2 Determination

Based on this analysis:

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

- No substantial changes are proposed in the project and there are no substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previous EIR due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects. Also, there is no "new information of substantial importance" as that term is used in *CEQA Guidelines* Section 15162(a)(3). Therefore, the previously certified EIR is adequate and this evaluation serves as an ADDENDUM to the 2013 Cotati General Plan Update Environmental Impact Report (General Plan FEIR). State Clearinghouse Number 2013082037 dated November 2014.

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Signature

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Date

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Printed Name

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Title

## 5 Addendum Evaluation Methodology

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### 5.1 General Plan Consistency

To promote a uniform and compatible vision for the development of the community, California law requires the General Plan be internally consistent in its goals and policies. The Housing Element is a component of the General Plan, and thus, the Housing Element update is consistent with the vision of the General Plan and is supported by goals and policies of the other General Plan elements.

General Plan elements and policies that affect housing are summarized below:

- The **Circulation Element** correlates closely with the Land Use Element, and identifies the general locations and extent of existing and proposed major thoroughfares, transportation routes, and alternative transportation facilities necessary to support a multi-modal transportation system. This element is intended to facilitate mobility of people and goods throughout Cotati by a variety of transportation modes, including bicycle, pedestrian, and rail.
- The **Community Services and Facilities Element** sets forth standards for public service and utility systems including water, wastewater, solid waste, schools, medical facilities, libraries, parks, recreation, and historic preservation.
- The **Conservation Element** addresses the conservation, development, and use of natural resources, riparian environments, native plant and animal species, soils, mineral deposits, cultural/historical resources, air quality, and alternative energy. It also details plans and measures for preserving open space for natural resources and the managed production of resources.
- The **Economic Vitality Element** is designed to support and enhance the City's economy, through programs to retain existing and attract new business, create jobs, to help maintain existing jobs, and to improve overall opportunities for businesses in the City.
- The **Land Use Element** designates the general distribution and intensity of residential, commercial, industrial, open space, public/quasi-public, and other categories of public and private land uses. The Land Use Element includes the Land Use Map, which identifies land use designations for each parcel in the city limits and SOI.
- The **Noise Element** establishes standards and policies to protect the community from the harmful and annoying effects of exposure to excessive noise levels. This element includes strategies to reduce land use conflicts that may result in exposure to unacceptable noise levels.
- The **Open Space Element** addresses the preservation of open space for the conservation of natural resources, and public health and safety related to open space and recreational opportunities. This element also includes provisions for parks and recreational facilities throughout the City.
- The **Safety Element** establishes policies and programs to protect the community from risk associated with geologic, flood, and fire hazards, as well as setting standards for emergency preparedness.

New State law requires that the Safety Element be updated to address climate adaptation upon revision of the Housing Element. The City will ensure compliance with this requirement by updating and adopting its updated Safety Element to follow the 2023 Housing Element. Further, new

statewide bills have been passed to address the inequitable distribution of pollution and associated health effects in low-income communities and communities of color. While the City of Cotati does not currently have any disadvantaged communities as defined by SB 535, neighborhoods within Cotati that are designated as Low Resource in the 2022 Tax Credit Allocation Committee (TCAC) Opportunity Areas will be analyzed and discussed as part of the Assessment of Fair Housing.

### Accommodation of the RHNA

As described in Section 2.3, the City of Cotati’s RHNA for the current planning period is 234 units, including 60 very low-income housing units, 34 low-income housing units, 39 moderate income housing units, and 101 above moderate-income housing units. The City must demonstrate the availability of sites with appropriate zoning and development standards that can facilitate and encourage the development of such units. The Housing Element update includes a housing strategy that accommodates the RHNA plus a buffer of additional housing sites as recommended by HCD. As shown in Table 3, the City anticipates the development of 30 ADUs during the eight-year planning period and 689 units would be facilitated from planned and approved (pipeline) projects which can count towards the RHNA.

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

	Very Low	Low	Moderate	Above Moderate	Total
<b>RHNA</b>	30	34	39	101	234
ADUs	9	9	9	3	30
Pipeline		119	35	535	689
Housing Sites		30	39	36	105
<b>Total Units After Programs</b>		167	83	574	824
<b>RHNA Surplus</b>		73	44	473	590
<b>Percent Buffer</b>		78%	113%	438%	252%

Source: ABAG 2022

The 824 units that would be facilitated by the Housing Element update would not exceed the 1,541 units included in the buildout capacity estimated under the General Plan and analyzed in the General Plan EIR. Furthermore, the Housing Element update would be consistent with State requirements for the RHNA to plan adequately to meet existing and projected housing needs for all economic segments of the community. In addition, the Housing Element update would first be submitted to the HCD for review and approval to ensure that it would adequately address the housing needs and demands of the City.

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

- **Accessory Dwelling Units (ADUs) and Junior ADUs.** The City anticipates the upward trend in the development of ADUs and JADUs throughout the 6th Cycle will increase and is supporting that assumption with programs to facilitate and incentivize production. As shown in Table 3, the City anticipates the development of 30 ADUs during the eight-year planning period.
- **Planned, Approved, and Pending Projects.** The Housing Element Update provides a brief description of approved and under review pipeline projects anticipated to accommodate up to 689 total units.

- **Housing Sites.** Site 1 (vacant site) is within the Northern Gateway zone of the Downtown Specific Plan area. This site would accommodate 5 units. Sites 2 and 3 (non-vacant sites) would accommodate a total of 100 units.

## 5.2 Preliminary Environmental Constraints

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

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

Environmental constraints to residential development typically relate to the presence of sensitive habitat, flooding, topography, and other natural and physical characteristics that can limit the amount of development in an area or increase the cost of development. The Housing Element update, in and of itself, does not propose specific development projects, but rather puts forth goals, policies, and programs that regulate or encourage new housing development in Cotati. Future housing development projects would be subject to developmental review to determine potential impacts specific to that project site.

## 6 Addendum Evaluation

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### 6.1 Aesthetics

#### General Plan EIR Findings

Aesthetics are discussed in Section 3.1, *Aesthetics and Visual Resources*, of the General Plan EIR. The General Plan EIR determined that while General Plan policies and actions are intended to maintain and enhance the overall visual character of the Planning Area, the potential for new development to interrupt scenic views, impact scenic resources, or degrade the quality of public views would remain significant and unavoidable.

The General Plan EIR stated that implementation of General Plan policies and actions would continue to require the review of all development proposals, planning projects and infrastructure projects to reduce lighting impacts on adjacent properties and to reduce lighting impacts to the night sky. Implementation of General Plan policies and actions related to the regulation and reduction of daytime glare and nighttime lighting would reduce such impacts to a less than significant level.

#### Addendum Analysis

Policies and actions in the General Plan that were referenced in the General Plan EIR would help reduce impacts to the greatest extent possible. These policies and actions would be required with implementation of the Housing Element update.

The Housing Element update is a policy document consistent with the General Plan. The Housing Element update identifies sites located throughout the city designated for residential development, which were evaluated previously for potential environmental impacts in the General Plan EIR. The Housing Element update also identifies sites that can accommodate ADUs as well as vacant and non-vacant properties that could accommodate new or additional housing units. Since non-vacant sites already contain some type of development, housing that may be built on these sites would not create a substantial change from current conditions. Similarly, most vacant sites are urban infill sites where development and infrastructure is already present adjacent to such sites. The units facilitated by the Housing Element update would not exceed the buildout capacity estimated under the General Plan and analyzed in the General Plan EIR.

The Housing Element update, in and of itself, does not propose specific projects but puts forth goals and policies that regulate various aspects of new housing development in Cotati. Because it is a policy document, the Housing Element update would not, in and of itself, result in impacts to scenic vistas, scenic resources, or visual character, and would not create new sources of substantial light or glare which adversely affects views.

Future development facilitated by the Housing Element update would undergo project-specific developmental review, including design review, and would be subject to adopted development guidelines, including standards that govern visual quality and community design.

## Conclusion

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

## 6.2 Agriculture and Forestry

### General Plan EIR Findings

Agriculture and Forestry Resources are discussed in Section 3.9, *Land Use*, of the General Plan EIR. The General Plan EIR found that impacts regarding the potential to conflict with existing farmlands, agricultural zoning or Williamson Act Contracts, and the conversion of farmlands, including prime farmland, unique farmland, and farmland of statewide importance would be less than significant.

There are no lands within or adjacent to the City that are currently zoned as forest land, timber, or timber production. The General Plan EIR found no impacts to forest land, timber, or timber production.

### Addendum Analysis

The General Plan goals and policies protect rural (Agricultural and Rural Residential) and natural open space lands from urbanization. These goals and policies would remain in effect with implementation of the Housing Element update. None of the sites identified in the Housing Element update are designated as Agriculture.

The Housing Element update is a policy document consistent with the General Plan. The Housing Element update identifies sites located throughout the city designated for residential development, which were evaluated previously for potential environmental impacts in the General Plan EIR. The Housing Element update also identifies sites that can accommodate ADUs as well as vacant and non-vacant properties that could accommodate new or additional housing units. Since non-vacant sites already contain some type of development, housing that may be built on these sites would not create a substantial change from current conditions. Similarly, most vacant sites are urban infill sites where development and infrastructure is already present adjacent to such sites. The units facilitated by the Housing Element update would not exceed the buildout capacity estimated under the General Plan and analyzed in the General Plan EIR.

The Housing Element update, in and of itself, does not propose specific projects but puts forth goals and policies that regulate various aspects of new housing development in Cotati. Because it is a policy document, the Housing Element update would not, in and of itself, result in impacts to agriculture or forestry.

Future development facilitated by the Housing Element update would undergo project-specific developmental review and be required to comply with any applicable requirements regarding agriculture and forestry including General Plan policies and actions.

## Conclusion

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

## 6.3 Air Quality

### General Plan EIR Findings

Air quality is discussed in Section 3.2, *Air Quality*, of the General Plan EIR. The General Plan EIR determined that impacts to air quality would be less than significant regarding the potential to conflict with applicable air quality plans, cumulatively considerable net increase of criteria pollutants for which the region is in non-attainment, exposure of sensitive receptors to pollutant concentrations, and the potential to create objectionable odors. The General Plan includes numerous goals and polices to reduce potential air quality impacts, and the City is required to enforce compliance with regional plans and programs that reduce air quality impacts.

### Addendum Analysis

Policies and actions in the General Plan that were referenced in the General Plan EIR would help reduce impacts to less than significant levels. These policies and actions would be required with implementation of the Housing Element update.

The Housing Element update is a policy document consistent with the General Plan. The Housing Element update identifies sites located throughout the city designated for residential development, which were evaluated previously for potential environmental impacts in the General Plan EIR. The Housing Element update also identifies sites that can accommodate ADUs as well as vacant and non-vacant properties that could accommodate new or additional housing units. Since non-vacant sites already contain some type of development, housing that may be built on these sites would not create a substantial change from current conditions. Similarly, most vacant sites are urban infill sites where development and infrastructure is already present adjacent to such sites. The units facilitated by the Housing Element update would not exceed the buildout capacity estimated under the General Plan and analyzed in the General Plan EIR.

Potential air quality-related impacts cannot be assessed in a meaningful way until the project site and development design is known, including the number of units, potential residents, and potential vehicle miles traveled. Short-term air quality impacts resulting from construction of the sites, such as dust generated by clearing and grading activities, exhaust emissions from gas- and diesel-powered construction equipment, and vehicular emissions associated with the commuting of construction workers will be subject to Bay Area Air Quality Management District rules and regulations. The Housing Element update, in and of itself, does not propose specific projects but puts forth goals and policies that regulate various aspects of new housing development in Cotati. Because it is a policy document, the Housing Element update would not, in and of itself, result in impacts to air quality.

Future development facilitated by the Housing Element update would undergo project-specific developmental review and be required to comply with adopted General Plan policies and actions regarding air quality and any applicable State and regional air quality plans.

## **Conclusion**

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

## 6.4 Biological Resources

### **General Plan EIR Findings**

Biological resources are discussed in Section 3.3, *Biological and Natural Resources*, of the General Plan EIR. The General Plan EIR determined that while implementation of projects proposed under the General Plan may have the potential to result in impacts to special status species, riparian habitat or other sensitive natural communities, adherence to the policies and action measures listed in the General Plan EIR, as well as federal and state regulations, would reduce impacts to these resources to a less than significant level. It further stated that all projects proposed under General Plan implementation would be required to comply with the General Plan and adopted state, federal, and local regulations for the protection of special status plants and wildlife, including habitat. Impacts were determined to be less than significant.

The General Plan EIR found that the General Plan would not conflict with any local policies or ordinances protecting biological resources, the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Impacts were determined to be less than significant.

### **Addendum Analysis**

Policies and actions in the General Plan that were referenced in the General Plan EIR would help reduce impacts to less than significant levels. These policies and actions would be required with implementation of the Housing Element update.

The Housing Element update is a policy document consistent with the General Plan. The Housing Element update identifies sites located throughout the city designated for residential development, which were evaluated previously for potential environmental impacts in the General Plan EIR. The Housing Element update also identifies sites that can accommodate ADUs as well as vacant and non-vacant properties that could accommodate new or additional housing units. Since non-vacant sites already contain some type of development, housing that may be built on these sites would not create a substantial change from current conditions. Similarly, most vacant sites are urban infill sites where development and infrastructure is already present adjacent to such sites. The units facilitated by the Housing Element update would not exceed the buildout capacity estimated under the General Plan and analyzed in the General Plan EIR.

The Housing Element update, in and of itself, does not propose specific projects but puts forth goals and policies that regulate various aspects of new housing development in Cotati. Because it is a policy document, the Housing Element update would not, in and of itself, result in impacts to biological resources.

Future development facilitated by the Housing Element update would undergo project-specific developmental review and be required to comply with the General Plan policies and actions regarding biological resources, and adopted state, federal, and local regulations for the protection of special status plants and wildlife, including habitat.

## Conclusion

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

## 6.5 Cultural Resources

### General Plan EIR Findings

Cultural resources are discussed in Section 3.4, *Cultural Resources*, of the General Plan EIR. The General Plan EIR determined that with implementation of General Plan policies and actions, and State law, impacts to historical resources, archaeological resources, and human remains would be less than significant.

### Addendum Analysis

Policies and actions in the General Plan that were referenced in the General Plan EIR would help reduce impacts to less than significant levels. These policies and actions would be required with implementation of the Housing Element update.

The Housing Element update is a policy document consistent with the General Plan. The Housing Element update identifies sites located throughout the city designated for residential development, which were evaluated previously for potential environmental impacts in the General Plan EIR. The Housing Element update also identifies sites that can accommodate ADUs as well as vacant and non-vacant properties that could accommodate new or additional housing units. Since non-vacant sites already contain some type of development, housing that may be built on these sites would not create a substantial change from current conditions. Similarly, most vacant sites are urban infill sites where development and infrastructure is already present adjacent to such sites. The units facilitated by the Housing Element update would not exceed the buildout capacity estimated under the General Plan and analyzed in the General Plan EIR.

The Housing Element update, in and of itself, does not propose specific projects but puts forth goals and policies that regulate various aspects of new housing development in Cotati. Because it is a policy document, the Housing Element update would not, in and of itself, result in impacts to cultural resources. Although known historic and prehistoric resource sites are located within Cotati's SOI, and 36 cultural resources have been recorded within the General Plan Planning Area, future

development facilitated by the Housing Element update would be evaluated for compliance with the City's General Plan, Municipal Code, and any other applicable State and local regulations regarding cultural resources including California Health and Safety Code Section 7050.5 and California Public Resources Code Section 5097.98.

## **Conclusion**

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

## **6.6 Energy**

### **General Plan EIR Findings**

The General Plan EIR does not include a separate section regarding energy since it was not required under the *CEQA Guidelines* Appendix G checklist at the time the report was prepared; however, energy is discussed in Section 4.3, *Significant Irreversible Effects*, of the General Plan EIR. The General Plan EIR found that General Plan policies focus on energy efficiency in the design, materials, construction, and use of buildings, the use of alternative energy systems, and alternative transportation modes. A discussion of energy impacts is provided herein to supplement the General Plan EIR.

### **Addendum Analysis**

Policies and actions in the General Plan that were referenced in the General Plan EIR would help reduce impacts to the greatest extent possible. These policies and actions would be required with implementation of the Housing Element update.

The Housing Element update is a policy document consistent with the General Plan. The Housing Element update identifies sites located throughout the city designated for residential development, which were evaluated previously for potential environmental impacts in the General Plan EIR. The Housing Element update also identifies sites that can accommodate ADUs as well as vacant and non-vacant properties that could accommodate new or additional housing units. Since non-vacant sites already contain some type of development, housing that may be built on these sites would not create a substantial change from current conditions. Similarly, most vacant sites are urban infill sites where development and infrastructure is already present adjacent to such sites. The units facilitated by the Housing Element update would not exceed the buildout capacity estimated under the General Plan and analyzed in the General Plan EIR.

The Housing Element update, in and of itself, does not propose specific projects but puts forth goals and policies that regulate various aspects of new housing development in Cotati. Because it is a policy document, the Housing Element update would not, in and of itself, result in impacts to energy.

Future development facilitated by the Housing Element update would undergo project-specific developmental review and be required to adhere to applicable regulations and General Plan policies

and actions related to energy resources and energy consumption with new residential construction, including California Code of Regulations (CCR) Title 20, Division 2, Chapter 4, *Energy Conservation*; CCR Title 24, Part 6, *California Energy Code*; and CCR Title 24, Part 11, *California Green Building Standards Code, Tier 1*.

## Conclusion

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

## 6.7 Geology and Soils

### General Plan EIR Findings

Geology and soils are discussed in Section 3.5, *Geology and Soils*, of the General Plan EIR. General Plan policies and actions require geotechnical investigations to be completed for all construction in areas with potential geological hazards and require that recommendations from the geotechnical analysis are incorporated into the project's design and engineering. The General Plan EIR determined that with implementation of General Plan policies and actions as well as applicable State and City regulations, impacts to geology and soils would be less than significant for adverse effects related to ground shaking, seismic-related ground failure, unstable soils, expansive soils, landslide, and loss of topsoil or soil erosion.

The General Plan EIR determined that there would be no septic tanks or alternative wastewater disposal systems utilized for new development as all new wastewater generated from General Plan land uses would be sent to the (regional) Laguna Treatment Plant for treatment. Impacts would be less than significant.

Paleontological resources are discussed in Section 3.4, *Cultural Resources*, of the General Plan EIR. There are no known paleontological resources in the General Plan Planning Area and future development would be analyzed for potential environmental impacts pursuant to State and local regulations regarding paleontological resources. Impacts would be less than significant.

### Addendum Analysis

Policies and actions in the General Plan that were referenced in the General Plan EIR would help reduce impacts to less than significant levels. These policies and actions would be required with implementation of the Housing Element update.

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

where development and infrastructure is already present adjacent to such sites. The units facilitated by the Housing Element update would not exceed the buildout capacity estimated under the General Plan and analyzed in the General Plan EIR.

The Housing Element update, in and of itself, does not propose specific projects but puts forth goals and policies that regulate various aspects of new housing development in Cotati. Because it is a policy document, the Housing Element update would not, in and of itself, result in impacts to geology and soils.

Future development facilitated by the Housing Element update would undergo project-specific developmental review to address potential impacts related to geology and soils, including adherence to State and City grading and building standards and requirements. Proponents of the individual projects may need to prepare geotechnical investigations prior to project design. Future development would be required to adhere to General Plan policies and actions related to paleontological resources.

## **Conclusion**

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

## **6.8 Greenhouse Gas Emissions**

### **General Plan EIR Findings**

Greenhouse gas (GHG) emissions are discussed in Section 3.6, *Greenhouse Gases and Climate Change*, of the General Plan EIR. The General Plan EIR determined that the General Plan policies and actions are consistent with the policy guidance provided by California Air Pollution Control Officers Association (CAPCOA) through the 2009 Model Policies for Greenhouse Gases in General Plans, which is consistent with the Assembly Bill (AB) 32 Scoping Plan, and GHG reduction measures recommended by the Bay Area Air Quality Management District. Impacts related to the generation of GHG emissions were determined to be less than significant.

The General Plan EIR determined that compliance with the City's Green Building Standards would reduce GHG emissions from future development to less than significant levels and ensure future development consistent with the General Plan would be consistent with all applicable plans and policies adopted for the purpose of reducing GHG emissions. Impacts were determined to be less than significant.

### **Addendum Analysis**

Policies and actions in the General Plan that were referenced in the General Plan EIR would help reduce impacts to less than significant levels. These policies and actions would be required with implementation of the Housing Element update.

The Housing Element update is a policy document consistent with the General Plan. The Housing Element update identifies sites located throughout the city designated for residential development, which were evaluated previously for potential environmental impacts in the General Plan EIR. The Housing Element update also identifies sites that can accommodate ADUs as well as vacant and non-vacant properties that could accommodate new or additional housing units. Since non-vacant sites already contain some type of development, housing that may be built on these sites would not create a substantial change from current conditions. Similarly, most vacant sites are urban infill sites where development and infrastructure is already present adjacent to such sites. The units facilitated by the Housing Element update would not exceed the buildout capacity estimated under the General Plan and analyzed in the General Plan EIR.

The Housing Element update, in and of itself, does not propose specific projects but puts forth goals and policies that regulate various aspects of new housing development in Cotati. Because it is a policy document, the Housing Element update would not, in and of itself, result in impacts to GHG emissions.

Future development facilitated by the Housing Element update would undergo project-specific developmental review and would be required to adhere to State and City building standards and policies designed to reduce GHG emissions with new residential construction, such as CCR Title 20, Division 2, *State Energy Resources Conservation and Development Commission*; and CCR Title 24, Part 11, *California Green Building Standards Code, Tier 1*.

## Conclusion

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

## 6.9 Hazards and Hazardous Materials

### General Plan EIR Findings

Hazards and hazardous materials are discussed in Section 3.7, *Hazards*, of the General Plan EIR. The General Plan EIR determined that impacts for hazardous materials would be less than significant with implementation of General Plan policies and actions for impacts related to the routine transport, use, or disposal of hazardous materials; the emission of acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school; and development on or near sites listed as hazardous material sites pursuant to Government Code Section 65962.5.

The City of Cotati does not have any airport facilities located within the city limits, SOI, of urban growth boundary. Impacts related to safety hazards from nearby airports would be less than significant.

The General Plan EIR determined that community safety facilities would be located outside of identified hazard areas to ensure these facilities are available in the event of a natural disaster and projects are not anticipated to remove or impede evacuation routes. It determined that the General

Plan does not include land uses, policies, or other components that conflict with adopted emergency response or evacuation plans. Impacts would be less than significant.

The General Plan EIR determined that with implementation of General Plan policies and actions, impacts regarding wildland fires would be less than significant.

### **Addendum Analysis**

Policies and actions in the General Plan that were referenced in the General Plan EIR would help reduce impacts to less than significant levels. These policies and actions would be required with implementation of the Housing Element update.

The Housing Element update is a policy document consistent with the General Plan. The Housing Element update identifies sites located throughout the city designated for residential development, which were evaluated previously for potential environmental impacts in the General Plan EIR. The Housing Element update also identifies sites that can accommodate ADUs as well as vacant and non-vacant properties that could accommodate new or additional housing units. Since non-vacant sites already contain some type of development, housing that may be built on these sites would not create a substantial change from current conditions. Similarly, most vacant sites are urban infill sites where development and infrastructure is already present adjacent to such sites. The units facilitated by the Housing Element update would not exceed the buildout capacity estimated under the General Plan and analyzed in the General Plan EIR.

The Housing Element update, in and of itself, does not propose specific projects but puts forth goals and policies that regulate various aspects of new housing development in Cotati. Because it is a policy document, the Housing Element update would not, in and of itself, result in impacts to hazards and hazardous materials.

Future development facilitated by the Housing Element update would undergo project-specific developmental review and would be required to comply with all applicable General Plan policies and actions as well as State and local regulations regarding hazards and hazardous materials.

### **Conclusion**

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

## **6.10 Hydrology and Water Quality**

### **General Plan EIR Findings**

Hydrology and water quality impacts are discussed in Section 3.8, *Hydrology and Water Quality*, of the General Plan EIR. The General Plan EIR determined that with implementation of General Plan policies and actions, impacts to hydrology and water quality would be less than significant relating to violating any water quality standards or waste discharge requirements, substantially decreasing groundwater supplies or interfering substantially with groundwater recharge, creating or

contributing to runoff water which would exceed the capacity of existing or planned stormwater drainage systems, degrading water quality, and exposing people or structures to a significant risk of loss, injury or death involving flooding.

### **Addendum Analysis**

Policies and actions in the General Plan that were referenced in the General Plan EIR would help reduce impacts to less than significant levels. These policies and actions would be required with implementation of the Housing Element update.

The Housing Element update is a policy document consistent with the General Plan. The Housing Element update identifies sites located throughout the city designated for residential development, which were evaluated previously for potential environmental impacts in the General Plan EIR. The Housing Element update also identifies sites that can accommodate ADUs as well as vacant and non-vacant properties that could accommodate new or additional housing units. Since non-vacant sites already contain some type of development, housing that may be built on these sites would not create a substantial change from current conditions. Similarly, most vacant sites are urban infill sites where development and infrastructure is already present adjacent to such sites. The units facilitated by the Housing Element update would not exceed the buildout capacity estimated under the General Plan and analyzed in the General Plan EIR.

The Housing Element update, in and of itself, does not propose specific projects but puts forth goals and policies that regulate various aspects of new housing development in Cotati. Because it is a policy document, the Housing Element update would not, in and of itself, result in impacts to hydrology and water quality.

Future development facilitated by the Housing Element update would undergo project-specific developmental review and be required to comply with General Plan policies and actions and all applicable regulations regarding hydrology and water quality.

### **Conclusion**

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

## **6.11 Land Use and Planning**

### **General Plan EIR Findings**

Land use and planning is discussed in Section 3.9, *Land Use*, of the General Plan EIR. The General Plan EIR determined that impacts to land use would be less than significant regarding conflicts with applicable land use plans, policies, or regulations.

The General Plan does not include any new areas designated for urbanization or new roadways, infrastructure, or other features that would divide existing communities and impacts were determined to be less than significant.

## **Addendum Analysis**

Policies and actions in the General Plan that were referenced in the General Plan EIR would help reduce impacts to less than significant levels. These policies and actions would be required with implementation of the Housing Element update.

The Housing Element update is a policy document consistent with the General Plan. The Housing Element update identifies sites located throughout the city designated for residential development, which were evaluated previously for potential environmental impacts in the General Plan EIR. The Housing Element update also identifies sites that can accommodate ADUs as well as vacant and non-vacant properties that could accommodate new or additional housing units. Since non-vacant sites already contain some type of development, housing that may be built on these sites would not create a substantial change from current conditions. Similarly, most vacant sites are urban infill sites where development and infrastructure is already present adjacent to such sites. The units facilitated by the Housing Element update would not exceed the buildout capacity estimated under the General Plan and analyzed in the General Plan EIR.

The Housing Element update, in and of itself, does not propose specific projects but puts forth goals and policies that regulate various aspects of new housing development in Cotati. Because it is a policy document, the Housing Element update would not, in and of itself, result in impacts to land use and planning. The Housing element update does not involve changes to the current adopted land uses.

Future development facilitated by the Housing Element update would undergo project-specific developmental review and be required to comply with General Plan policies and actions and all applicable regulations regarding land use.

## **Conclusion**

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

## 6.12 Mineral Resources

### **General Plan EIR Findings**

A background discussion of mineral resources is provided in Section 3.5, *Geology and Soils*, of the General Plan EIR. The General Plan EIR only provides background information regarding mineral resources. Therefore, a discussion of potential impacts to mineral resources is provided herein to supplement the General Plan EIR.

### **Addendum Analysis**

The Planning Area does not contain land classified as Mineral Resource Zone 2 (MRZ-2) known mineral resources (California Department Of Conservation Division Of Mines And Geology 1987).

The Stony Point Rock Quarry, located approximately 2 miles south of Cotati, is the nearest mineral extraction site.

The Housing Element update is a policy document consistent with the General Plan. The Housing Element update identifies sites located throughout the city designated for residential development, which were evaluated previously for potential environmental impacts in the General Plan EIR. The Housing Element update also identifies sites that can accommodate ADUs as well as vacant and non-vacant properties that could accommodate new or additional housing units. Since non-vacant sites already contain some type of development, housing that may be built on these sites would not create a substantial change from current conditions. Similarly, most vacant sites are urban infill sites where development and infrastructure is already present adjacent to such sites. The units facilitated by the Housing Element update would not exceed the buildout capacity estimated under the General Plan and analyzed in the General Plan EIR.

The Housing Element update, in and of itself, does not propose specific projects but puts forth goals and policies that regulate various aspects of new housing development in Cotati. Because it is a policy document, the Housing Element update would not, in and of itself, result in impacts to mineral resources.

Future development facilitated by the Housing Element update would undergo project-specific developmental review and would be required to adhere to applicable regulations regarding mineral resources.

## Conclusion

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

## 6.13 Noise

### General Plan EIR Findings

Noise is discussed in Section 3.10, *Noise*, of the General Plan EIR. The General Plan EIR determined that implementation of the General Plan would result in significant and unavoidable impacts relative to noise from traffic noise sources and cumulative noise levels associated with traffic. Railroad, construction, and stationary source noise impacts were found to be less than significant with implementation of General Plan actions and policies.

The General Plan EIR found that the General Plan would not impact an airport compatibility plan or expose people residing or working in the project area because the project is not located within an airport land use plan or within two miles of a public airport or public use airport.

## Addendum Analysis

Policies and actions in the General Plan that were referenced in the General Plan EIR would help reduce impacts to the greatest extent possible. These policies and actions would be required with implementation of the Housing Element update.

The Housing Element update is a policy document consistent with the General Plan. The Housing Element update identifies sites located throughout the city designated for residential development, which were evaluated previously for potential environmental impacts in the General Plan EIR. The Housing Element update also identifies sites that can accommodate ADUs as well as vacant and non-vacant properties that could accommodate new or additional housing units. Since non-vacant sites already contain some type of development, housing that may be built on these sites would not create a substantial change from current conditions. Similarly, most vacant sites are urban infill sites where development and infrastructure is already present adjacent to such sites. The units facilitated by the Housing Element update would not exceed the buildout capacity estimated under the General Plan and analyzed in the General Plan EIR.

The Housing Element update, in and of itself, does not propose specific projects but puts forth goals and policies that regulate various aspects of new housing development in Cotati. Because it is a policy document, the Housing Element update would not, in and of itself, result in impacts to noise.

Future development facilitated by the Housing Element update would undergo project-specific developmental review and would be required to adhere to General Plan policies and actions related to noise and applicable noise regulations.

## Conclusion

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

## 6.14 Population and Housing

### General Plan EIR Findings

Population and housing is discussed Section 3.9, *Land Use*, of the General Plan EIR. The General Plan EIR determined implementation of the General Plan would result in less than significant impacts relating to unplanned population growth and the displacement of substantial numbers of people or existing housing.

### Addendum Analysis

The Housing Element update is a policy document consistent with the General Plan. As discussed in Section 2, *Project Context*, of this Addendum, the 824 units that would be facilitated by the Housing Element update would not exceed the 1,541 units included in the buildout capacity estimated under the General Plan and analyzed in the General Plan EIR. The California Department of Finance estimates Cotati has an average household size of 2.4 residents per unit (California Department of

Finance 2022). The potential increase of 1,978 residents that would result from implementation of the Housing Element update would not exceed the population growth anticipated under the General Plan of 3,775 new residents.

The Housing Element update is a policy document consistent with the General Plan. The Housing Element update identifies sites located throughout the city designated for residential development, which were evaluated previously for potential environmental impacts in the General Plan EIR. The Housing Element update also identifies sites that can accommodate ADUs as well as vacant and non-vacant properties that could accommodate new or additional housing units. Since non-vacant sites already contain some type of development, housing that may be built on these sites would not create a substantial change from current conditions. Similarly, most vacant sites are urban infill sites where development and infrastructure is already present adjacent to such sites. The units facilitated by the Housing Element update would not exceed the buildout capacity estimated under the General Plan and analyzed in the General Plan EIR.

The Housing Element update, in and of itself, does not propose specific projects but puts forth goals and policies that regulate various aspects of new housing development in Cotati. Because it is a policy document, the Housing Element update would not, in and of itself, result in impacts to population and housing. The additional units facilitated by the Housing Element update would assist in meeting the identified housing needs of the City's communities and City's RHNA and would not exceed that previously evaluated under the General Plan EIR.

## **Conclusion**

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

## 6.15 Public Services

### **General Plan EIR Findings**

Public services are discussed in Section 3.11, *Public Services and Recreation*, of the General Plan EIR. The General Plan EIR determined that implementation of the General Plan would not result in substantial adverse physical impacts associated with new or physically altered public services facilities, including those related to fire, police, schools, parks, and libraries, and impacts would be less than significant.

### **Addendum Analysis**

As discussed in Section 2, *Project Context*, and Section 6.14, *Population and Housing*, of this Addendum, the potential increase in residential units and population that would occur from implementation of the Housing Element update would not exceed growth anticipated under the General Plan. Therefore, the demand for public services and recreational facilities would not exceed that previously evaluated in the General Plan EIR.

The Housing Element update is a policy document consistent with the General Plan. The Housing Element update identifies sites located throughout the city designated for residential development, which were evaluated previously for potential environmental impacts in the General Plan EIR. The Housing Element update also identifies sites that can accommodate ADUs as well as vacant and non-vacant properties that could accommodate new or additional housing units. Since non-vacant sites already contain some type of development, housing that may be built on these sites would not create a substantial change from current conditions. Similarly, most vacant sites are urban infill sites where development and infrastructure is already present adjacent to such sites. The units facilitated by the Housing Element update would not exceed the buildout capacity estimated under the General Plan and analyzed in the General Plan EIR.

The Housing Element update, in and of itself, does not propose specific projects but puts forth goals and policies that regulate various aspects of new housing development in Cotati. Because it is a policy document, the Housing Element update would not, in and of itself, result in impacts to public services.

The demand for public services would not exceed that previously evaluated in the General Plan EIR. Future development facilitated by the Housing Element update would undergo project-specific developmental review, and would be evaluated for conformance with the General Plan policies and actions, State law, City Municipal Code including the payment of fees, and other applicable regulations.

## **Conclusion**

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

## 6.16 Recreation

### **General Plan EIR Findings**

Recreation is discussed in Section 3.11, *Public Services and Recreation*, of the General Plan EIR. The General Plan EIR determined that implementation of the General Plan would not result in substantial adverse physical impacts associated with the deterioration of existing parks and recreation facilities or the construction of new parks or recreation facilities. Impacts would be less than significant.

### **Addendum Analysis**

The City of Cotati General Plan requires a park standard of a minimum of one acre per 200 residents. Buildout of the General Plan would result in the need for approximately 17.5 acres of new parks and recreation facilities to serve projected buildout growth within the City limits, and 26 acres of new parks and recreation facilities to served projected buildout growth within the Planning Area. As discussed in Section 2, *Project Context*, and Section 6.14, *Population and Housing*, of this Addendum, the potential increase in residential units and population that would occur from

implementation of the Housing Element update would not exceed growth anticipated under the General Plan. Therefore, the demand for new parks and recreational facilities would not exceed that anticipated under the General Plan.

The Housing Element update is a policy document consistent with the General Plan. The Housing Element update identifies sites located throughout the city designated for residential development, which were evaluated previously for potential environmental impacts in the General Plan EIR. The Housing Element update also identifies sites that can accommodate ADUs as well as vacant and non-vacant properties that could accommodate new or additional housing units. Since non-vacant sites already contain some type of development, housing that may be built on these sites would not create a substantial change from current conditions. Similarly, most vacant sites are urban infill sites where development and infrastructure is already present adjacent to such sites. The units facilitated by the Housing Element update would not exceed the buildout capacity estimated under the General Plan and analyzed in the General Plan EIR.

The Housing Element update, in and of itself, does not propose specific projects but puts forth goals and policies that regulate various aspects of new housing development in Cotati. Because it is a policy document, the Housing Element update would not, in and of itself, result in impacts to recreation or recreation facilities.

The demand for recreational facilities would not exceed that previously evaluated in the General Plan EIR. Future development facilitated by the Housing Element update would undergo project-specific developmental review, and would be evaluated for conformance with the General Plan policies and actions, State law, City Municipal Code including the dedication of land or the payment of fees and other applicable regulations.

## Conclusion

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

## 6.17 Transportation

### General Plan EIR Findings

Transportation is evaluated in Section 3.12, *Transportation and Circulation*, of the General Plan EIR. The General Plan EIR analyzed Level of Service (LOS) as the methodology to assess significance and found that implementation of the General Plan would result in acceptable operation of LOS D or better at all study intersections under Cotati's jurisdiction. However, several segments on US 101 are projected to operate unacceptably at LOS F in the future (year 2040) due to regional growth including buildout of the General Plan. Therefore, the impact to US 101 was determined to be significant and unavoidable.

The General EIR determined that uncertainty exists as to whether funding will be available to achieve all General Plan policies and actions related to future circulation improvements including the widening of Gravenstein Highway (SR 116), a regional highway facility owned and operated by

Caltrans that also serves local traffic within Cotati. Therefore, the potential for implementation of the General Plan to conflict with local policies would be significant and unavoidable.

The General Plan EIR determined that the General Plan does not contain provisions that would increase hazards due to design features of incompatible uses and roadway facilities in Cotati are not expected to impede emergency access. These impacts would be less than significant.

Since certification of the EIR and pursuant to Senate Bill (SB) 743, transportation impacts are evaluated using vehicle miles traveled (VMT) instead of LOS.

### **Addendum Analysis**

Policies and actions in the General Plan that were referenced in the General Plan EIR would help reduce impacts to the greatest extent possible. These policies and actions would be required with implementation of the Housing Element update.

The Housing Element update is a policy document consistent with the General Plan. The Housing Element update identifies sites located throughout the city designated for residential development, which were evaluated previously for potential environmental impacts in the General Plan EIR. The Housing Element update also identifies sites that can accommodate ADUs as well as vacant and non-vacant properties that could accommodate new or additional housing units. Since non-vacant sites already contain some type of development, housing that may be built on these sites would not create a substantial change from current conditions. Similarly, most vacant sites are urban infill sites where development and infrastructure is already present adjacent to such sites. The units facilitated by the Housing Element update would not exceed the buildout capacity estimated under the General Plan and analyzed in the General Plan EIR. Additionally, the proposed housing sites would concentrate housing development in the city rather than in the SOI, which would reduce overall vehicle miles traveled.

The Housing Element update, in and of itself, does not propose specific projects but puts forth goals and policies that regulate various aspects of new housing development in Cotati. Because it is a policy document, the Housing Element update would not, in and of itself, result in impacts to transportation.

Future development facilitated by the Housing Element update would undergo project-specific developmental review and be required to adhere to General Plan policies and all applicable regulations and requirements related to transportation.

### **Conclusion**

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

## 6.18 Tribal Cultural Resources

### General Plan EIR Findings

Tribal Cultural Resources was added to the 2016 *CEQA Guidelines* as a separate environmental issue area. Thus, the General Plan EIR (published in September 2014) does not include a chapter or section dedicated to analysis of impacts to tribal cultural resources. However, it does analyze general impacts to historical and cultural resources (including archeological resources that may originate from Native American tribes) in Section 3.5, *Cultural Resources*. As the Notice of Preparation for the General Plan EIR was published before July 1, 2015, tribal consultation pursuant to Assembly Bill (AB) 52 was not required.

In 2011 during the General Plan update process, the City sent letters to the Native American Heritage Commission, the Federated Indians of Graton Rancheria, and the Cotati Historical Society to request information regarding the Planning Area. The Native American Heritage Commission responded indicating that they had no specific information regarding cultural resources within the Planning Area. The Federated Indians of Graton Rancheria responded indicating that because the General Plan Update falls under Senate Bill (SB) 18 they would initiate consultation directly with the City. The City met with the Federated Indians of Graton Rancheria and the Cotati Historical Society.

### Addendum Analysis

The ethnographic context of the Coast Miwok is provided as Appendix A to this document. This appendix provides supplementary background information.

The Housing Element update is a policy document consistent with the General Plan. The Housing Element update identifies sites located throughout the city designated for residential development, which were evaluated previously for potential environmental impacts in the General Plan EIR. The Housing Element update also identifies sites that can accommodate ADUs as well as vacant and non-vacant properties that could accommodate new or additional housing units. Since non-vacant sites already contain some type of development, housing that may be built on these sites would not create a substantial change from current conditions. Similarly, most vacant sites are urban infill sites where development and infrastructure is already present adjacent to such sites. The units facilitated by the Housing Element update would not exceed the buildout capacity estimated under the General Plan and analyzed in the General Plan EIR.

The Housing Element update, in and of itself, does not propose specific projects but puts forth goals and policies that regulate various aspects of new housing development in Cotati. Because it is a policy document, the Housing Element update would not, in and of itself, result in impacts to tribal cultural resources.

On April 18, 2022 during the Housing Element update process, the City sent a letter to the Federated Indians of Graton Rancheria to initiate AB 52 and SB 18 consultation. The tribe responded on May 3, 2022, requesting both AB 52 and SB 18 consultation. The City met with the tribe on September 28, 2022 and December 12, 2022, and consultation is ongoing. Additional AB 52 and SB 18 consultation letters were sent to the Cloverdale Rancheria of Pomo Indians, Dry Creek Rancheria of Pomo Indians, Guidiville Indian Rancheria, Lytton Rancheria, Middletown Rancheria of Pomo Indians, Mishewal-Wappo Tribe of Alexander Valley, Pinoleville Pomo Indians, and Robinson Rancheria of Pomo Indians on July 1, 2022. None of these tribes requested consultation. No previously unidentified tribal cultural resources within the city have been identified during consultation, and the Housing Element update would not result in increased impacts to potential

tribal cultural resources. However, future development facilitated under the Housing Element update would undergo project-specific developmental review and be required to comply with General Plan policies and actions and all applicable regulations that help protect and conserve tribal cultural resources.

## **Conclusion**

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

## 6.19 Utilities

### **General Plan EIR Findings**

Utilities are discussed in Section 3.13, *Utilities*, of the General Plan EIR. The General Plan EIR determined that the potential to exceed wastewater treatment capacity or the requirements of the Regional Water Quality Control Board would be cumulatively considerable and significant and unavoidable. The General Plan EIR further determined that impacts related to water supply, stormwater drainage, and solid waste would be less than significant.

### **Addendum Analysis**

Policies and actions in the General Plan that were referenced in the General Plan EIR would help reduce impacts to the greatest extent possible. These policies and actions would be required with implementation of the Housing Element update.

The Housing Element update is a policy document consistent with the General Plan. The Housing Element update identifies sites located throughout the city designated for residential development, which were evaluated previously for potential environmental impacts in the General Plan EIR. The Housing Element update also identifies sites that can accommodate ADUs as well as vacant and non-vacant properties that could accommodate new or additional housing units. Since non-vacant sites already contain some type of development, housing that may be built on these sites would not create a substantial change from current conditions. Similarly, most vacant sites are urban infill sites where development and infrastructure is already present adjacent to such sites. The units facilitated by the Housing Element update would not exceed the buildout capacity estimated under the General Plan and analyzed in the General Plan EIR.

The Housing Element update, in and of itself, does not propose specific projects but puts forth goals and policies that regulate various aspects of new housing development in Cotati. Because it is a policy document, the Housing Element update would not, in and of itself, result in impacts to utilities.

Future development facilitated by the Housing Element update would undergo project-specific developmental review and be subject to adopted development guidelines and other regulatory requirements concerning water, wastewater, storm drains, solid waste, and other infrastructure; water supply; and wastewater treatment systems.

## Conclusion

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

## 6.20 Wildfire

### General Plan EIR Findings

The General Plan EIR discusses wildfire in Section 3.7, *Hazards*, and determined that the City of Cotati is not categorized as a "Very High" Fire Hazard Severity Zone (FHSZ) by the California Department of Forestry and Fire Protection. A portion of the SOI is in a State Responsibility Area and categorized as a "Moderate" FHSZ. The closest "Very High" FHSZ is located east of SR 12, over 10 miles from the eastern city limits. The General Plan EIR states that as future development and infrastructure projects are considered by the City, each project would be evaluated for potential impacts, specific to the project, associated with wildland fire hazards as required under CEQA. Impacts regarding potential to expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands would be less than significant.

### Addendum Analysis

The City of Cotati is not in a State Responsibility Area or Very High Fire Hazard Severity Area (California Department of Forestry and Fire Protection 2007). A portion of the Cotati SOI remains in a State Responsibility Area categorized as a "Moderate" FHSZ.

Policies and actions in the General Plan that were referenced in the General Plan EIR would help reduce impacts to the greatest extent possible. These policies and actions would be required with implementation of the Housing Element update.

The Housing Element update is a policy document consistent with the General Plan. The Housing Element update identifies sites located throughout the city designated for residential development, which were evaluated previously for potential environmental impacts in the General Plan EIR. The Housing Element update also identifies sites that can accommodate ADUs as well as vacant and non-vacant properties that could accommodate new or additional housing units. Since non-vacant sites already contain some type of development, housing that may be built on these sites would not create a substantial change from current conditions. Similarly, most vacant sites are urban infill sites where development and infrastructure is already present adjacent to such sites. The units facilitated by the Housing Element update would not exceed the buildout capacity estimated under the General Plan and analyzed in the General Plan EIR.

The Housing Element update, in and of itself, does not propose specific projects but puts forth goals and policies that regulate various aspects of new housing development in Cotati. Because it is a policy document, the Housing Element update would not, in and of itself, result in impacts to wildfire.

Future development facilitated by the Housing Element update would be required to adhere to General Plan and other State and local regulatory requirements concerning wildfire hazards and emergency response. Additionally, the Housing Element update would concentrate housing development as infill development in the city and in areas with existing adequate emergency response services.

## **Conclusion**

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

## 7 Conclusion

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The City of Cotati, acting as the lead agency, determined that an addendum is the appropriate environmental document under CEQA because the proposed project would not require revisions to the certified General Plan EIR due to the involvement of new significant environmental effects or substantial increases in the severity of significant effects previously identified in the General Plan EIR.

There are no changed circumstances or new information that meets the standards for requiring further environmental review under *CEQA Guidelines* Section 15162. Thus, these circumstances and information would not result in new or more severe impacts beyond what were addressed in the General Plan EIR and would not meet any other standards under *CEQA Guidelines* Section 15162(a)(3). No additional analysis is required based on the discussions throughout this addendum. The proposed Housing Element update would not involve development in areas not assumed for development in the General Plan EIR, nor would it result in population growth and density beyond what was analyzed in the General Plan EIR. The project would not result in significant or substantially more severe impacts that were not discussed in the General Plan EIR. Also, there are no previously identified significant effects which, as a result of substantial new information that was not known at the time of the previous environmental review, would be substantially more severe than discussed in the General Plan EIR. Accordingly, no additional CEQA review is required.

*CEQA Guidelines* Section 15164 states that “[t]he lead agency or a 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 *CEQA Guidelines* Section 15162 calling for preparation of a subsequent EIR have occurred.” An addendum is therefore appropriate because, as explained above, none of the conditions calling for preparation of a subsequent EIR have occurred.

## 8 References

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### 8.2 List of Preparers

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

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# Appendix A

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Coast Miwok Ethnographic Context

## Ethnographic Context: Coast Miwok

The City of Cotati is located in the traditional tribal territory of the Coast Miwok. Coast Miwok territory is centered on Marin and Sonoma Counties, extending roughly from Duncan's Point south to Point Bonita, with the inland boundary east of the Sonoma River (Kelly 1978:414; Kroeber 1925:443). The Miwok Language consists of two dialect groups: the southern, or Marin group, and the western, or Bodega group (Kelly 1978:414).

The pre-contact Coast Miwok inhabited villages made up of conical dwellings, semi-subterranean sweathouses, and dance houses (Kelly 1978:417). Each village had a chief to oversee village affairs and social and ceremonial life was organized around moieties, or dichotomous groups, classed as either Land or Water (Kelly 1978:419).

Coast Miwok subsistence was based on hunting, gathering, and fishing (Kelly 1978: 415-417). Dried acorns and kelp were primary food sources during the winter and early spring when food was scarce. Coast Miwok relied heavily on nearshore fish and shellfish and on fish from rivers, marshes, and the bay. Hunting focused on deer, elk, bear, and small game. The material culture of the Coast Miwok included clamshell disk beads as currency, and a variety of stone tools, shell ornaments, ceremonial artifacts, and baskets (Kelly 1978: 417-418).

The Coast Miwok were exploited for labor by Mission Dolores, established in 1800 in San Francisco, and later by the Mexican land grant holders. As a direct result of the establishment of the mission system, the Coast Miwok population dramatically declined. After the establishment of the United States, the Coast Miwok were legally prevented from owning land in their traditional territories. Despite this, the Coast Miwok continued to populate the Marin area, often working as farm workers or in the fishing industry (Milliken et al. 2009; Federated Indians of Graton Rancheria 2016).

In 1920, the Bureau of Indian Affairs purchased a 15.45-acre tract of land in Graton, CA which was put into a federal trust and thus, the Graton Rancheria was formed. The development of the Graton Rancheria effectively consolidated the Coast Miwok and Southern Pomo groups into one entity, establishing them as a federally recognized tribe (Federated Indians of Graton Rancheria 2016). However, in 1958 Congress passed the California Rancheria Act of 1958 which led the termination of 41 California Rancherias, including the Graton Rancheria. Graton Rancheria was removed from federal trust and federal recognition of the tribe was terminated. Despite this setback, tribal members continued to protect their cultural identity, preserving important tribal and archaeological sites within their traditional and ancestral territory. Between 1990 and 1992 tribal members traveled to Washington, D.C., in effort to restore their federal status but it wasn't until 2000 that President Clinton finally signed legislation restoring federal recognition to the tribe, which had been renamed the Federated Indians of Graton Rancheria. The tribe was able to purchase 254 acres of land in 2005 for its reservation located near Rohnert Park, CA where they now operate the Graton Resort and Casino, and in doing so, the tribe is able to provide programs and services to Tribal Citizens (Federated Indians of Graton Rancheria 2016).

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