

Merced County Housing Element Update Project

Addendum Evaluation State Clearinghouse #2011041067

prepared by

County of Merced
222 Main Street
Merced, California 95340
Contact: Tiffany Ho, Deputy Director of Planning

prepared with the assistance of

Rincon Consultants, Inc.
7080 North Whitney Ave Suite #101
Fresno, California 93720

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Table of Contents

Acronyms and Abbreviations	iii
1 Introduction and Project Summary	1
1.1 Project Title.....	1
1.2 Lead Agency/Project Sponsor Name and Address	1
1.3 Contact Person and Phone Number	1
1.4 Project Location	1
1.5 Project Description	3
1.6 Discretionary Action	4
1.7 Prior Environmental Document(s).....	4
1.8 Location of Prior Environmental Document	4
2 Project Context.....	5
2.1 Purpose of the Housing Element	5
2.2 Regional Housing Needs Allocation (RHNA)	6
2.3 Changes in State Law	6
2.4 Merced County General Plan.....	7
2.5 Merced County General Plan EIR.....	8
2.6 Housing Element Update	9
2.7 Buildout of Proposed Project and Comparison to the 2003 General Plan EIR.....	13
3 Overview of CEQA Guidelines Section 15162 and Section 15164.....	15
4 Environmental Effects and Determination	17
4.1 Environmental Areas Determined to Have New or Substantially More Severe Significant Effects Compared to Those Identified in the Previous EIR	17
4.2 Determination.....	17
5 Addendum Evaluation Methodology	19
5.1 General Plan Consistency	19
5.2 Preliminary Environmental Constraints.....	21
6 Addendum Evaluation	22
6.1 Aesthetics.....	22
6.2 Agriculture and Forestry	23
6.3 Air Quality	25
6.4 Biological Resources	30
6.5 Cultural Resources	33
6.6 Energy	34
6.7 Geology and Soils.....	36
6.8 Greenhouse Gas Emissions.....	38
6.9 Hazards and Hazardous Materials	40

Merced County Housing Element Update Project

6.10	Hydrology and Water Quality	42
6.11	Land Use and Planning.....	43
6.12	Mineral Resources	49
6.13	Noise	50
6.14	Population and Housing.....	52
6.15	Public Services	53
6.16	Recreation.....	54
6.17	Transportation	55
6.18	Tribal Cultural Resources	58
6.19	Utilities.....	60
6.20	Wildfire	61
7	Cumulative Impacts	63
8	Conclusion	64
9	References	65
9.1	Bibliography	65
9.2	List of Preparers	65

Tables

Table 1	2024-2032 Regional Housing Need Allocation	6
Table 2	Summary of Areas of Potential Impact under the General Plan EIR	8
Table 3	Housing Unit Credits	12
Table 4	Housing Unit Yield per Site Category.....	13
Table 5	Total Development Evaluated in the 2030 General Plan EIR Compared to the Housing Element Update	14
Table 6	SJVAPCD Thresholds of Significance – Criteria Pollutant Emissions.....	29

Figures

Figure 1	Regional Project Site Location	2
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Acronyms and Abbreviations

AMI	Area Median Income
BMP	best management practices
CAL FIRE	California Department of Forestry and Fire Protection
CEQA	California Environmental Quality Act
EIR	Environmental Impact Report
FAR	floor-area ratio
FHSZ	Fire Hazard Severity Zone
GHG	greenhouse gas
LOS	level of service
SB	Senate Bill
SOI	Sphere of Influence
VMT	vehicle miles traveled

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1 Introduction and Project Summary

1.1 Project Title

Merced County Housing Element Update Project

1.2 Lead Agency/Project Sponsor Name and Address

County of Merced Planning Department
2222 M Street
Merced, California 95340

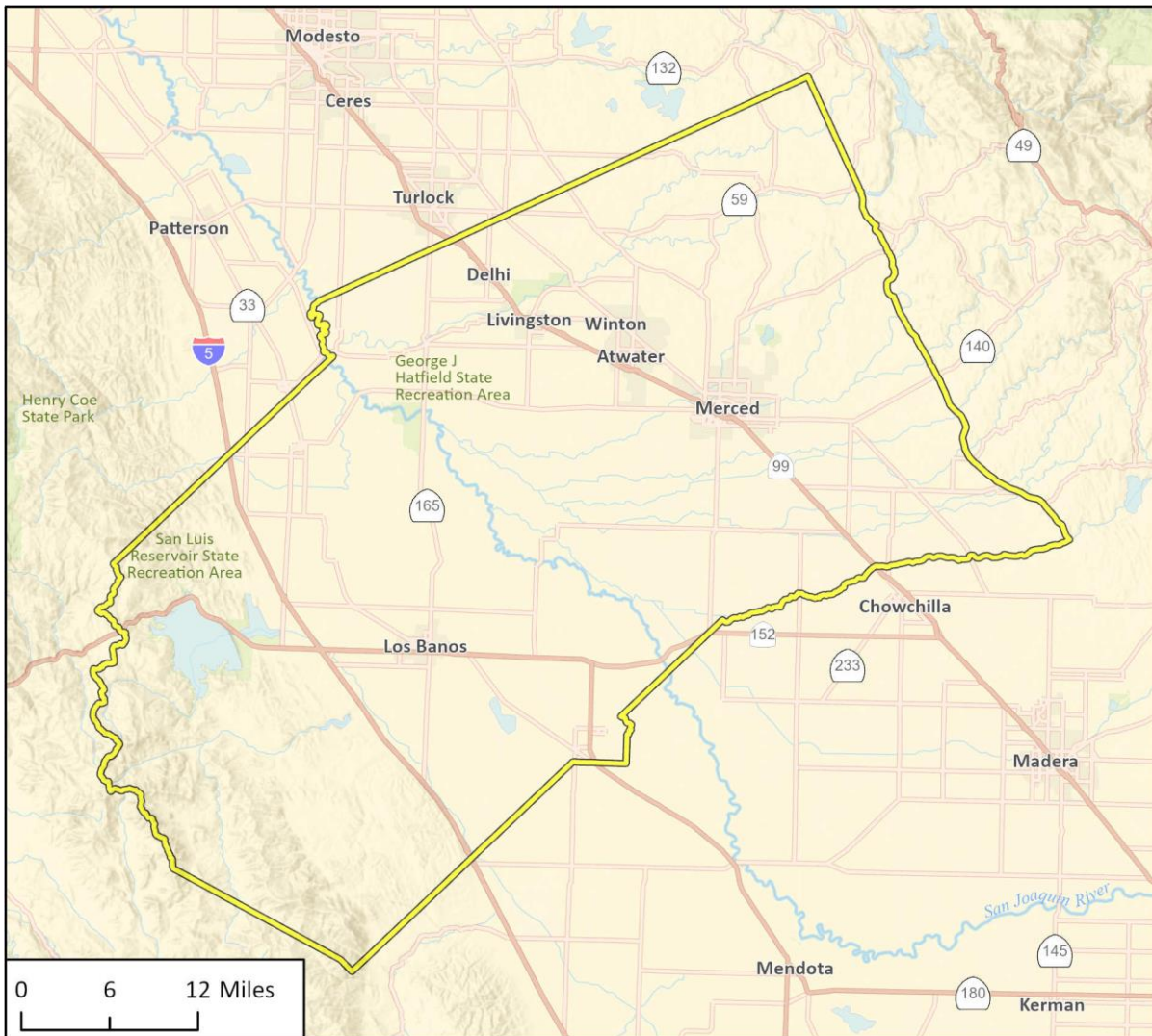
1.3 Contact Person and Phone Number

Tiffany Ho, Deputy Director of Planning
Tiffany.Ho@countyofmerced.com
(209) 385-7654 ext. 4407

1.4 Project Location

The proposed Housing Element (HE) Update project would occur in unincorporated communities in Merced County, located in the San Joaquin Valley in Central California. Merced County is bounded by Stanislaus County and Tuolumne County to the north; Mariposa County to the east; Madera County and Fresno County to the south; and Santa Clara County and San Benito County to the west. The regional project location is shown in Figure 1.

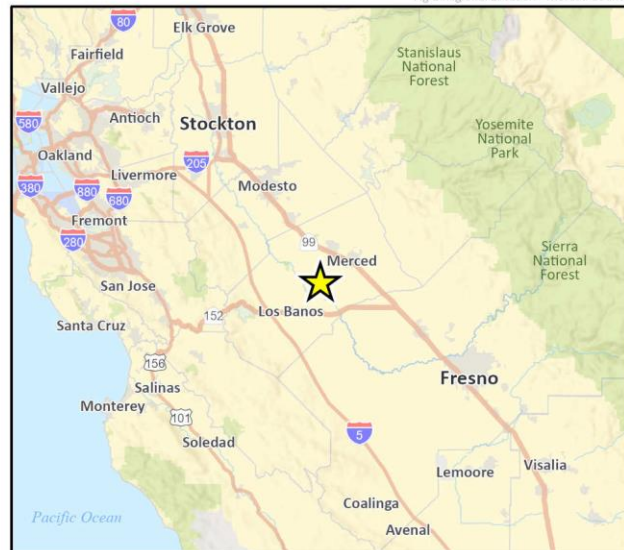
Figure 1 Regional Project Site Location



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Fig 1 Regional Location - Merced County

 Merced County Boundary 



1.5 Project Description

The project consists of a comprehensive update to the County of Merced General Plan Housing Element (herein referred to as “Housing Element Update” or “the project”). The County’s 2030 General Plan underwent extensive environmental review in the form of an Environmental Impact Report (EIR), which was certified in December 2013 by the Board of Supervisors (State Clearinghouse No. 2011041067). The Merced County General Plan EIR is a comprehensive document and includes discussion of alternatives and growth inducing impacts associated with development anticipated by the General Plan.

State law requires that housing elements be updated every eight years (California Government Code Sections 65580 to 65589.8). Each eight-year period is referred to as a “cycle.” For the County of Merced, the current (6th) cycle planning period runs from December 2023 through December 2031. Each Housing Element cycle, the California Department of Housing and Community Development assigns each region a share of the state’s housing need, and the regional government (in this case, the Merced County Association of Governments) assigns each jurisdiction a share of the Regional Housing Needs Allocation (RHNA).

The Housing Element Update must contain the following elements:

- Identification and analysis of existing and projected housing needs, resources, and constraints
- A statement of goals, policies, quantified objectives, and scheduled programs for preservation, improvement, and development of housing
- Assessment of the County’s fair housing issues
- Adequate provision for existing and projected needs of all economic segments of the population
- A Site Inventory which demonstrates the County’s ability to accommodate its share of the RHNA community

The project would bring the County’s Housing Element into compliance with Housing Element Law, including legislation passed since the publication of the previous Housing Element (adopted in 2016).

The Housing Element is the County’s plan for determining how to address existing and future housing needs and plan for future growth. The Housing Element Update will not directly result in environmental impacts as it does not propose to develop any projects nor would it result in land use changes or rezoning. Rather, it establishes objectives and policies designed to guide future development as the County works to achieve State-mandated housing goals.

The Site Inventory contains “opportunity sites” that are suitable for inclusion in the Site Inventory (pursuant to Housing Element Law) with their existing zoning and land use designations, and “rezone sites” that zoning and land use changes to qualify for inclusion. Housing Element policies and programs includes a commitment to future rezoning of the designated rezone sites, but the zoning and land use changes required to make those sites available for development are not analyzed as part of this environmental review. When a specific development proposal is considered for approval, that project would be subject to adopted development guidelines and standards and it must comply with the 2030 General Plan policies and actions listed in the certified 2030 General Plan EIR (herein called “General Plan EIR”) in accordance with California Environmental Quality Act (CEQA) Guidelines Section 15168(c)(3). If a subsequent activity (in this case, zoning or land use

changes or a specific development proposal) would have effects not identified in the EIR (the 2013-2030 General Plan EIR and this Addendum), the lead agency must prepare additional CEQA documentation prior to project approval.

This Addendum analyzes the development capacity of the opportunity sites and the sites to be rezoned (buildout of the proposed project) and compares it with the full-buildout scenario presented in the 2013 General Plan EIR. This Addendum assesses whether the Housing Element Update would result in impacts not addressed or previously analyzed in the General Plan EIR.

1.6 Discretionary Action

The project would require the following discretionary actions by the County of Merced Planning Commission and Board of Supervisors:

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

1.7 Prior Environmental Document(s)

County of Merced, 2030 General Plan Environmental Impact Report (General Plan Update EIR). State Clearinghouse Number 2011041067, certified in October 2013 and Addendum to the EIR approved June 25, 2024.

1.8 Location of Prior Environmental Document

County of Merced, Community and Economic Development Department Website:
<https://www.countyofmerced.com/2009/Final-Program-EIR>

2 Project Context

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 county with a coordinated and comprehensive strategy for promoting the production of safe, decent, and affordable housing within the community.

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 Housing Element is one of the seven General Plan elements required by State law (Government Code Section 65302). The Housing Element serves as an integrated part of the 2003 General Plan, but unlike other General Plan elements, it is required by law to be updated every eight years (California Government Code Section 65588). Each eight-year period is referred to as a "cycle." The County is in the 6th cycle.

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 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 County decision making and set forth an action plan to implement these housing programs during the eight-year planning period.

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 people. 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).

2.2 Regional Housing Needs Allocation (RHNA)

The RHNA reflects the California Department of Housing and Community Development’s determination of the projected housing needs in a region by household income level as a percent of the Area Median Income (AMI). The Merced County Association of Governments (MCAG) was tasked with allocating this regional housing need among the jurisdictions in the MCAG region. Table 1 shows the breakdown of the County’s share of the RHNA for the 6th cycle.

Table 1 2024-2032 Regional Housing Need Allocation

Income Group	Regional Unit Needs (Merced County)	Percent of Merced County’s Total Units
Very low (\leq 50% AMI)	1,042	25%
Low ($>$ 50-80% AMI)	714	17%
Moderate ($>$ 80-120% AMI)	736	17%
Above Moderate ($>$ 120% AMI)	1,758	41%
Total	4,250	100%

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

Source: MCAG 2022

The County had 287,303 households as of January 2024 (California Department of Finance [DOF] 2024). As of 2024, 76.9 percent were single-family units, which included 73.8 percent single-family detached units and 3.1 percent single-family attached units; 17.3 percent were multi-family dwelling units; and the remaining 5.8 percent were mobile homes (DOF 2024).

Table 3, *Housing Unit Yield Per Site Category*, in Section 5 of this addendum shows the Housing Element Update’s Site Inventory.

2.3 Changes in State Law

The Housing Element Update has incorporated and addressed all substantive changes to State housing law since the County’s last Housing Element was adopted and certified in 2016, including but not limited to:

- Affordable Housing Streamlined Approval Process: Senate Bill 35 (2017)
- Additional Housing Element Sites Analysis Requirements: Assembly Bill 879 (2017) and Assembly Bill 1397 (2017)

- Affirmatively Furthering Fair Housing: Assembly Bill 686 (2017)
- No-Net-Loss Zoning: Senate Bill 166 (2017)
- By Right Transitional and Permanent Supportive Housing: Assembly Bill 2162 (2018) and Assembly Bill 101 (2019)
- Accessory Dwelling Units: Assembly Bill 2299 (2016), Senate Bill 1069 (2016), Assembly Bill 494 (2017), Senate Bill 229 (2017), Assembly Bill 68 (2019), Assembly Bill 881 (2019), Assembly Bill 587 (2019), Senate Bill 13 (2019), and Assembly Bill 671 (2019)
- Density Bonus: Assembly Bill 1763 (2019)
- Housing Crisis Act of 2019: Senate Bill 330
- Surplus Land Act Amendments: Assembly Bill 1486 and AB 1255 (2019)
- Housing Impact Fee Data: Assembly Bill 1483 (2019)
- Emergency and Transitional Housing Act of 2019: Assembly Bill 139 (2019)
- Standardization of Sites Inventory Analysis and Reporting: Senate Bill 6 (2019)

2.4 Merced County 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 Merced County General Plan planning area includes all lands within the county outside of the six incorporated cities (Atwater, Dos Palos, Gustine, Livingston, Los Banos, and Merced). The 2030 General Plan is a legal document that serves as Merced County's "blueprint" or "constitution" for all future land use, development, preservation, and resource conservation decisions. General Plans must be comprehensive and long-term.

The Merced County General Plan, adopted in October 2013, establishes, and implements new goals and policies for regulating development projects and for balancing population growth with infrastructure availability, agricultural preservation, and natural resource protection. Other goals and policies are directed to resource protection, ensuring the timely availability of public infrastructure and services, and encouraging a well-balanced economy. The plan will also integrate new planning concepts endorsed by the County Board of Supervisors and translate the updated goals and policies into implementation programs (such as amendments to the County's code, zoning ordinance, and subdivision regulations) to assure that the County's vision is implemented.

The General Plan document contains Land Use Diagrams, which identifies the various urban boundary designations, the County Planning Areas, and areas designated for Agricultural and Foothill Pasture uses.

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's future, such as sustainability, community design, and public art. The Merced County General Plan includes the following elements:

- Economic Development
- Land Use
- Agricultural
- Circulation
- Housing
- Public Services
- Natural Resources
- Recreation
- Health and Safety
- Air Quality
- Water

2.5 Merced County General Plan EIR

The Merced County General Plan EIR addressed the potential environmental effects of the planned buildout of Merced County through the approximately 20 year period between 2013 to 2030 and concluded that implementation of the General Plan would result in environmental impacts as detailed in Table 2. Mitigation measures in the General Plan EIR were incorporated as policies in the General Plan to reduce potential impacts from project development.

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

Issue Area	Level of Significance after Mitigation	Mitigation Proposed in the General Plan EIR
Aesthetics	Less than Significant	Mitigation Measure AES-3
Agricultural and Forestry	Significant and Unavoidable	Mitigation Measures AG-1a through AG-1e, AG-3a through AG-3c
	Less than Significant	Mitigation Measure AG-2a through AG-2c, AG-5a through AG-5h
Air Quality	Less than Significant	Mitigation Measure AQ-4, AQ-5a through AQ-5b,
	Significant and Unavoidable	Mitigation Measure AQ-3a through AQ-3d
Biological Resources	Significant and Unavoidable	Mitigation Measure BIO-1a through BIO-1r, BIO-2
	Less than Significant	Mitigation Measure BIO-3, BIO-4a through BIO-4d
Cultural Resources	Less than Significant	Mitigation Measure CUL-1a through CUL-1c, CUL-2 through CUL-3
Geology and Soils	Less than Significant	Mitigation Measure GEO-4a through GEO-4c
Global Climate Change	Significant and Unavoidable	Mitigation Measure GHG-1a through GHG-1g, GHG-2
Hazards and Hazardous Materials	Less than Significant	Mitigation Measure HAZ-3 through HAZ-4
Hydrology and Water Quality	Significant and Unavoidable	Mitigation Measure HYD-2a through HYD-2b
	Less than Significant	Mitigation Measure HYD-3a through HYD-3c
Land Use and Planning	Less than Significant	Mitigation Measure LU-1a through LU-1b
Noise	Less than Significant	Mitigation Measure NSE-4a through NSE-4b
	Significant and Unavoidable	Mitigation Measure NSE-5a through NSE-5f
Population and Housing	Less than Significant	Mitigation Measure POP-1a through POP-1c
Public Services	Less than Significant	None required
Recreation	Less than Significant	None required

Issue Area	Level of Significance after Mitigation	Mitigation Proposed in the General Plan EIR
Transportation and Traffic	Significant and Unavoidable	Mitigation Measure TRF-1a through TRF-1e, TRF-2a through TRF-2d, TRF-3a through TRF-3b
	Less than Significant	Mitigation Measure TRF-6a through TRF-6b, TRF-7 through TRF-8
Utilities and Service Systems	Significant and Unavoidable	Mitigation Measure USS-1a through USS-1d

Source: County of Merced 2013

General Plan Assumptions

The General Plan buildout analysis assumes an approximately 20-year horizon to the year 2030. The General Plan will accommodate future growth in Merced County, including new businesses, expansion of existing businesses, and new residential uses, but it does not specify or anticipate exactly when buildout would occur, as long-range demographic and economic trends are difficult to predict. The designation of a site in the General Plan for a certain use does not necessarily mean that the site will be developed or redeveloped with that use during the planning period, as most development depends on property owner initiative. It only means that a certain site has the capacity to develop at a specified intensity by right or without changing its General Plan designation and/or zoning.

As discussed in Section 16 of the General Plan EIR, the General Plan anticipates a total population of approximately 180,560 residents, 56,425 residential units, and 58,615 total jobs, at buildout by 2030. During the 20-year time frame, this new growth would increase the County's population by more than 90,000 new residents and 27,999 housing units by 2030.

2.6 Housing Element Update

The 2024-2032 Housing Element Update has the following major components:

- A **Review of Past Accomplishments**, which evaluates the effectiveness of its 5th Cycle Housing Element programs in addressing housing issues, details its progress toward the previous Regional Housing Needs Allocation (RHNA), and presents a comprehensive review of past accomplishments, with an emphasis on special needs housing, quantified objectives, and recommendations for the 6th Cycle Housing Element. (Chapter A1)
- A **Public Participation** section that provides the County's public engagement efforts for the Housing Element Update including pop-up events, community workshops, a community survey, stakeholder interviews, and responses to community input, revealing significant concerns about affordability, housing availability, special needs housing, and the necessity for rental assistance, housing variety, rehabilitation services, and education on housing rights. (Chapter A2)
- A **Housing Needs Assessment** which summarizes demographic, employment, and housing characteristics. The main source of the information is the pre-approved data package for jurisdictions approved by the California Department of Housing and Community Development (HCD). (Chapter A3)
- A **Housing Constraints Analysis** that outlines non-governmental, governmental, environmental and infrastructure constraints and was used in the development of specific policies and actions included in the Housing Plan to remove barriers to housing and to incentivize housing

production, specifically targeting housing production at all income levels and housing for persons with special needs. (Chapter A4)

- An **Affirmatively Furthering Fair Housing** section that analyzes issues relating to fair housing for the County of Merced. (Chapter A5)
- A **Housing Resources and Site Inventory Analysis** which outlines the methodology and results of the Site Inventory analysis to demonstrate Merced County’s ability to meet its 6th cycle RHNA, detailing available infrastructure, services, financial, and administrative resources, and incorporating regional development trends and community input. (Chapter A6)
- A **Housing Plan** that sets forth a strategy, including goals, policies, and programs, to address housing issues identified in the County of Merced. (Chapter A7)

Goals, Policies, and Programs

The primary objective of the Housing Element is to encourage the production of new housing units to meet the RHNA and housing for special needs populations. This is done by adopting a series of goals and policies that facilitate the development of all housing types, explore innovative housing solutions, address the needs of the County’s residents, and affirmatively further fair housing. The 2024-2032 Housing Element Update goals, policies, and programs are summarized below and referenced throughout this Addendum as appropriate.

Housing Development

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

Government Constraints

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

The 6th Cycle Housing Element Update includes programs to help the county overcome these constraints. The strategies employed would help remove government constraints to accommodate special housing needs and expedite processing for affordable housing projects.

Conservation of Existing Housing

Almost half of Merced County’s housing units are more than 40 years old and rehabilitation needs will increase over the planning period. Negative effects of code enforcement can occur when compliance measures are not economically feasible for property owners. The Housing Element Update contains policies and programs that aim to preserve existing housing while protecting the occupant’s cultural, socio-economic, and/or accessibility needs.

Fair Housing

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

Site Inventory

The Housing Element must demonstrate through the Site Inventory that the County has capacity to meet its share of the RHNA. Merced County's share of the RHNA for the current planning period is 4,250 units, consisting of 1,756 very low- and low-income housing units, 736 moderate-income housing units, and 1,758 above moderate-income housing units. The Housing Element Update includes a site inventory that accommodates Merced County's share of the RHNA plus a buffer of additional housing units as recommended by HCD. The Site Inventory identifies opportunity sites and rezone sites. Opportunity sites refer to parcels of land identified in a jurisdiction's Housing Element site inventory as having realistic potential for residential development within the planning period. Rezone sites are parcels that require a zoning change to accommodate the housing needs identified in the Housing Element.

The County would meet its RHNA through planned, approved, and pending projects projected to develop during the planning period and adequate sites identified in the Site Inventory, including opportunity sites and rezone sites.

Credits

Credits refer to planned and approved housing projects and ADUs that count toward a jurisdiction's RHNA obligation. These credits represent housing units that have been entitled or permitted and projected ADUs, and help demonstrate progress in meeting the jurisdiction's required housing production targets. Table 3 shows the County's share of RHNA and housing unit yield per income category that is met by housing credits.

PLANNED, APPROVED, AND PENDING PROJECTS

Jurisdictions may count planned, approved, and pending residential units as credits towards their RHNA. These units can be counted toward each income level according to demonstrated affordability, provided it can be demonstrated that the units can be built within the planning period. Pipeline projects are concentrated in CDPs of Delhi, Franklin/Beachwood, and Hilmar and consist of single-family projects. As shown in Table 3, the County currently has 177 above moderate-income units in planned, approved, and pending projects, which may be credited towards the County's RHNA.

ADUS

Jurisdictions may count the potential for ADU development as credits towards their RHNA obligations. Recent legislation has facilitated the increased permitting and production of ADUs in many communities. The County issued an average of two ADU building permits per year during the

last five years. Extrapolated over the 2024-2032 Housing Element planning period, the County can assume the production of 16 ADUs.

Table 3 Housing Unit Credits

	Number of Lower-Income Units	Number of Moderate-Income Units	Number of Above Moderate-Income Units	Total Number of Units
County's Share of RHNA	1,756	736	1,758	4,250
Planned and Approved Units	0	0	177	177
ADUs Anticipated	0	0	16	16
Total Unit Credits	0	0	193	80
Remaining RHNA Obligation	1,756	736	1,565	4,057

Sources: County of Merced

Sites in Inventory

The County has not identified enough units through the credits described above (projected ADU development and pending, approved, or permitted projects) to meet its share of the 6th Cycle RHNA for the lower- and moderate-income category. Therefore, the County identified sites to include in the Site Inventory to accommodate 1,875 lower-income units, 784 moderate-income units, and 1,563 above moderate-income units on 73 sites. The summary of the residential Site Inventory is presented in Table 4.

HOUSING OPPORTUNITY SITES

Housing Opportunity Sites refer to specific parcels of land identified by a city or county as suitable for residential development to accommodate projected housing needs, particularly for different income levels. These sites are included in the Site Inventory, a key component of the Housing Element required by State law (Government Code Section 65583.2).

The Housing Element Update has prepared an inventory of suitable sites for housing development. As shown in Chapter A4, *Merced County Housing Resources*, the Site Inventory is broken up into seven CDPs identified as Urban Communities (Delhi, Franklin/Beachwood, Hilmar, Le Grand, Planada, Santa Nella, and Winton). Please refer to Chapter A4, *Merced County Housing Resources*, of the Housing Element Update for details on housing opportunity sites.

Of the 73 sites included in the County's Site Inventory, 58 are vacant and 15 are nonvacant. The existing use of all nonvacant sites is agriculture. Given these redevelopment trends on active agricultural sites, the County does not anticipate existing operational agricultural uses to impede conversion from agricultural land to residential development on the four sites included in the Site Inventory.

REZONE SITES

The capacity of the Opportunity Sites still leaves the City with a shortfall of capacity of 1,404 low-income units and 1,423 above moderate-income units. To accommodate this shortfall of capacity, the County is obligated to rezone land suitable to facilitate the development of the remaining required housing units. The Site Inventory identifies 20 sites to be rezoned to facilitate additional residential development. The sites will be rezoned from light industrial to high-density residential with a maximum density of 33 dwelling units per acre. These sites encompass 70 acres and can

accommodate a total of 1,523 lower-income units, 37 moderate income-units, and 37 above moderate-income units. Rezone sites are localized in Delhi, Hilmar, Le Grand, and Planada, as shown in Chapter A4, *Merced County Housing Resources*, of the Housing Element.

The rezone sites shall include the following components pursuant to Government Code Section 65583.2(i):

- If rezoned to address a shortfall of lower-income capacity, the City must permit owner-occupied and rental multi-family uses by-right for developments in which 20 percent or more of the units are affordable to lower-income households. By-right means approval without discretionary review.
- The site must accommodate the development of at least 16 units per site.
- Each site must be zoned to allow a minimum density of 20 units per acre.
- The City must ensure that either: a) at least 50 percent of the shortfall of lower-income capacity can be accommodated on sites designated for exclusively residential uses; or b) if accommodating more than 50 percent of the lower-income capacity on sites designated for mixed uses, all sites designated for mixed uses must allow 100 percent residential use and require that residential uses occupy at least 50 percent of the floor area in a mixed-use project.

Table 4 Housing Unit Yield per Site Category

	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Units
Remaining RHNA Obligation	1,756	736	1,565	4,057
Opportunity Sites (Delhi)	172	38	49	259
Opportunity Sites (Franklin/Beachwood)	0	63	0	63
Opportunity Sites (Hilmar)	17	1	607	625
Opportunity Sites (Le Grand)	0	17	12	29
Opportunity Sites (Planada)	13	213	351	577
Opportunity Sites (Santa Nella)	150	310	341	801
Opportunity Sites (Winton)	0	105	166	271
Rezone Sites	1,523	37	37	1,597
Total Capacity of Opportunity and Rezone Sites	1,875	784	1,563	4,222

2.7 Buildout of Proposed Project and Comparison to the 2003 General Plan EIR

The Housing Element Update is programmatic in nature. It is a policy document that includes targeted programs that facilitate and guide housing development towards designated opportunity and rezone sites. Therefore, the buildout is assumed to be the housing unit capacity of the opportunity and rezone sites—4,222 total units. This addendum conducts a comprehensive analysis of project implementation and evaluates environmental effects of these programs and their cumulative impacts.

The total buildout for the Housing Element Update would be 4,222 units. As discussed above, new development under the General Plan would result in an increase in the County’s population to a total of 180,560 residents by 2030.

CEQA Baseline and Comparison to the General Plan EIR

The CEQA baseline for this analysis is the maximum allowable development for residential uses under the County’s General Plan EIR. The General Plan EIR assumed a buildout of 56,425 residential units and 180,560 residents. Table 5 compares the potential buildout under the Housing Element Update to the buildout contemplated in the General Plan EIR.

As shown in Table 5, Merced County had a population of 89,167 in 2010. As of 2024, Merced County has a population of 90,795 (DOF 2024). This represents an increase of 1,628 residents and 2,751 housing units since the 2010 General Plan EIR was certified. Growth within the County has occurred at a slower rate than was anticipated in the 2010 General Plan EIR, and there is a remaining capacity of 25,675 housing units, or 89,765 persons, before the full anticipated General Plan buildout is reached.

The proposed Housing Element Update is expected to result in an increase of 4,222 units, or 14,101 residents to meet its state-mandated RHNA obligations.¹ This would result in a total County population of 104,896, which is below the anticipated General Plan total buildout of 180,560 residents. As shown on Table 5, this increase is well within the growth projections anticipated in the Merced County General Plan EIR.

The projected growth aligns with RHNA requirements and is consistent with regional housing expectations. Additionally, the Housing Element Update is not directly responsible for increasing the population but rather aims to prepare for the growth that is anticipated within the region. The proposed project is intended to assist the County in achieving the vision of the existing 2010 General Plan and provide the necessary housing units to accommodate the anticipated growth and assist the County in meeting its share of the RHNA for the 6th Cycle Housing Element period.

The Housing Element Update would not exceed the buildout projections considered in the 2010 General Plan EIR, and because the 2010 General Plan EIR analyzed impacts associated with full General Plan buildout, the project would not be expected to result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects. A full analysis of the potential for new or substantially more severe environmental effects is provided in Section 6, *Addendum Evaluation*.

Table 5 Total Development Evaluated in the 2030 General Plan EIR Compared to the Housing Element Update

	2010 (a) ¹	2024 (b)	Actual Growth: 2010 to 2024 (c=b-a)	Total Buildout Assumed under 2030 General Plan EIR (d)	Buildout Remaining under 2003 General Plan EIR (e=d-c)	Buildout under Proposed Housing Element Update (f) ¹
Housing Units	27,999	30,750	+2,751	56,425	25,675	4,222
Population	89,167	90,795	+1,628	180,560	89,765	14,101

¹ Based on Merced County persons per household of 3.34 (DOF 2024)

¹ Based on a residential unit increase of 854 units multiplied by 2.87 persons per household (DOF 2024)

3 Overview of CEQA Guidelines Section 15162 and Section 15164

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. 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 County 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 Merced County 2030 General Plan Final EIR (certified December 2013, State Clearinghouse Number 2011041067). The following Addendum Evaluation details any changes in the

Merced County Housing Element Update Project

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 County's determination that the proposed project 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

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

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

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

4.2 Determination

Based on this analysis:

- Substantial changes are proposed in the project or there are substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previous EIR due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects. Or, there is "new information of substantial importance," as that term is used in *CEQA Guidelines* Section 15162(a)(3). Therefore, a SUBSEQUENT or SUPPLEMENTAL EIR is required.
- No substantial changes are proposed in the project and there are no substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previous EIR due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects.

County of Merced
Merced County Housing Element Update Project

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 2030 General Plan Final Environmental Impact Report (General Plan FEIR). State Clearinghouse Number 2013032015 dated May 2017.

Mark E. Hamilton

Signature

May 19, 2026

Date

Mark Hamilton

Printed Name

Planner III

Title

5 Addendum Evaluation Methodology

5.1 General Plan Consistency

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

- The **Economic Development Element** provides the policy context for Merced County to achieve its vision for future economic development and prosperity. Agriculture is the foundation of Merced County's economy, and the County consistently ranks as one of California's top five producers of milk and cream, chickens, almonds, alfalfa, cattle and calves, silage, and tomatoes. Merced County is home to four agricultural processing facilities that are among the largest of their kind in the world. The major focus of this element identifies ways Merced County can diversify its economy and attract new industries while expanding the agricultural industry.
- The **Land Use Element** provides the policy context for Merced County to achieve its vision for both rural and urban land use. This element includes a description of the goals, policies, and standards for future land use, development, community design, energy efficiency, and agricultural/resource protection in unincorporated Merced County.
- The **Agricultural Element** of the General Plan contains goals and policies that will guide the vision for the protection, preservation, and expansion of productive agriculture. Agriculture is the prominent economic segment in the County and accounts for more than 90 percent of all land area. Merced County is ranked fifth among all counties in California and sixth in the nation in the annual market value of farm products. Rich soils, accessible irrigation water, favorable climate, a large labor force, and reliable access to local, national, and global markets make Merced County a thriving agricultural community.
- The purpose of the **Transportation and Circulation Element** is to provide the policy context for the County to achieve safe and efficient circulation of people, vehicles, and goods throughout the County. Roadways, rail, and air are the three primary travel conduits in Merced County. This element establishes the goals and policies for the circulation system in order to balance the varying needs of motorists, bicyclists, pedestrians as well as the unique needs for the movement of farm equipment and agricultural commodities.
- The **Public Facilities and Services Element** provides guidance for the logical and efficient expansion and/or upgrading of services and facilities in Merced County. Development in the County is dependent on a complicated network of public facilities and services. Each type of service has a unique set of challenges and must adapt to growth and change differently. Several types of County-provided public facilities and services are experiencing limitations including libraries, jail facilities, road maintenance, and Sheriff and Fire Department staffing. Although there is generally an adequate distribution of libraries and fire stations, County fiscal problems have kept staffing and equipment at minimum levels. While the County has historically experienced high rates of population growth in some areas, it has not been able to increase staffing of libraries, fire stations, or Sheriff "beats" to maintain a constant per capita service level.

Merced County Housing Element Update Project

- The **Natural Resources Element** defines the County’s rich natural resources which are essential to the local economy and quality of life. These resources are also a source of natural beauty and scenic vistas in the County. The preservation and protection of these resources is vital to the continued benefit and enjoyment of current and future residents. This element provides the policy context for Merced County to achieve its vision for the management and preservation of natural resources.
- The **Recreation and Cultural Resources Element** provides goals and policies for Merced County to achieve its vision for recreation opportunities and cultural resource protection. Recreation resources and facilities provide economic, health, and open space benefits to County residents while archeological and historical resources help preserve the unique character of Merced County.
- The **Health and Safety Element** provides the policy context for protecting County residents and properties from unreasonable risks associated with hazards. People and communities are subject to potential harm from natural forces, such as flooding and earthquakes, as well as from human-caused hazards such as noise and aviation. Balancing human safety with environmental protection poses an urgent challenge for decision makers. For example, by directing human activities to areas that are less susceptible to flooding and wildfire, the County can reduce risks to human safety. Similarly, by controlling the extent and intensity of certain land uses and activities in sensitive natural areas, the County can dramatically reduce negative impacts on unique natural resources.
- The purpose of the **Housing Element** is to identify and analyze existing and projected housing needs in order to preserve, improve, and develop housing for all economic segments of the community.
- The **Air Quality Element** provides the policy context for Merced County to achieve its vision for air quality and greenhouse gas reduction. Air pollution can adversely affect human health, degrade the natural and built environments, adversely impact the production and quality of agricultural crops, and change the earth’s climate. It is a major factor in defining the quality of life for County residents, and the San Joaquin Valley air basin has air pollution levels among the worst in the nation. Cities and counties in the San Joaquin Valley Air Basin are required to amend their general plans to include goals, policies, and feasible implementation strategies to improve air quality and address climate change. Besides regulating point-source pollution, such as industrial sources of pollution, the primary means for local government to improve air quality is by changing land use patterns and reducing automobile travel. For a rural area like Merced County, the primary role in this strategy is to direct development to existing urban areas and to minimize parcelization and residential development on agricultural and open space land.
- The **Water Element** explains Water is one of the most critical resources for the Merced County economy and for the quality of life of its residents. Both surface water and groundwater supplies are an important determinant of future growth and agricultural production in the County, yet, like much of California, areas of the County have experienced problems with water supply and quality. Declining groundwater levels have been a long-term, recurring problem in certain regions of the County. Groundwater recharge, conjunctive use programs, and recycled water practices are keys to meeting increased agricultural and urban water demands. Water conservation will also be critical to sustaining an adequate water supply for future use. Water quality is also a concern in many areas of the County where contamination sources have degraded water use. Areas with degraded water quality may require extensive and expensive treatment/remediation. This element includes goals and policies that address the multiple uses of water, including urban, agricultural, and environmental. The element also addresses water resource issues, such as water supply, water quality, and watershed management.

Adoption of the Housing Element Update will require the County to amend the General Plan’s Appendix C, which contains the Housing Element.

5.2 Preliminary Environmental Constraints

The Housing Element Update does not propose specific development projects but rather guides future growth in the County. Each future development project would be subject to separate review to determine potential impacts on the environment related to each project 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 and standards and be required to incorporate applicable mitigation measures and alternatives developed in the General Plan EIR certified in 2013 and possibly with any specific community plans policies and/or mitigation measures from its Community Plan EIR (if applicable) (in accordance with *CEQA Guidelines* Section 15168[c][3]). If a subsequent activity (in this case a specific development proposal that requires discretionary approval) would have effects not identified in the program EIR (the General Plan EIR and this Addendum), the lead agency must prepare additional CEQA documentation.

This Addendum evaluation includes the analysis of the changes and potential impacts related to the adoption of the Housing Element Update. This Addendum evaluation is intended to demonstrate the project's consistency with the existing Merced County 2030 General Plan and Final EIR to satisfy the requirements of CEQA. In particular, and pursuant to Public Resources Code Section 21083.3, this Addendum Evaluation assesses whether the Housing Element Update, as a policy and programs document, includes impacts not addressed or analyzed as significant effects in the General Plan EIR.

6 Addendum Evaluation

6.1 Aesthetics

General Plan EIR Findings

The General Plan EIR determined the 2030 General Plan would result in less than significant impacts to scenic highways and scenic vistas with implementation of the 2030 General Plan policies and compliance with specific design criteria through policies NR-4.1 through NR-4.4, RCR-1.11, PFS-5.6, LU-1.1, LU-1.12, LU-2.1, LU-2.2, LU-5.A, LU-5.B, LU-5.B.1, LU-5.B.3, LU-6.7, and LU-7.3. Implementation of the General Plan would lead to urban development and other activities that could create new sources of substantial light or glare. Mitigation Measure AES-3 recommends the development and implementation of a new lighting ordinance to reduce light pollution associated with new developments. Mitigation Measure AES-3 supplemented with the existing Policy NR-4.5 would reduce impacts to light and glare to less than significant. The 2030 General Plan's goals and policies aim to minimize new urban development, preserve scenic highway corridors, maintain visual quality, and mitigate light intrusion, thus reducing Merced County's contribution to significant cumulative loss of aesthetic quality to a level less than cumulatively considerable. The 2030 General Plan would also result in a less than significant cumulative effect with regards to cultural resources.

Addendum Analysis

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

The proposed project would update the General Plan's Housing Element thus the fundamental regulations and requirements of the General Plan, such as meeting design standards, would still apply. Goals and policies in the 2030 General Plan that were referenced in the General Plan EIR, such as policies NR-4.1 through NR-4.4, RCR-1.11, PFS-5.6, LU-1.1, LU-1.12, LU-2.1, LU-2.2, LU-5.A, LU-5.B, LU-5.B.1, LU-5.B.3, LU-6.7, and LU-7.3, would mitigate impacts. Furthermore, the Mitigation Measure adopted for the General Plan EIR (AES-3) would supplement the General Plan goals and policies to reduce impacts to the furthest extent possible. This mitigation measure recommends the development and implementation of a new lighting ordinance to reduce light pollution associated with new developments. These goals, policies, and measures would continue to be required with implementation of the proposed project.

Future development facilitated by the proposed project would undergo project-specific developmental review, including design review, and would be subject to adopted development regulations, 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 or zoning. 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

The General Plan EIR determined that implementation of the 2030 General Plan would lead to urban development and other developed land uses that would convert prime farmland, unique farmland, farmland of statewide importance, farmland of local importance, and confined animal agriculture to non-agricultural uses. The General Plan recognizes agriculture as the primary land use in the county and provides goals and policies that would provide some protective measures to prevent the conversion of agricultural lands designated as important farmland to non-agricultural uses such as Policies AG-2.1 through AG-2.4, Alternative Policy AG-2.7, Policies AG-2.8, AG-2.9, AG-2.11 through AG-2.16, AG-3.1 through AG-3.5, AG-3.7 through AG-3.11, LU-1.1, LU-1.2, LU-1.4, LU-1.5, LU-2.1 through LU-2.4, LU-2.6, LU-2.9, LU-4.1 through LU-4.3, LU-5.A.1, LU-5.F.1, LU-7.1, NR-3.10, NR-3.11, and NR-3.13. Additionally, Mitigation Measures AG-1a through AG-1c and AG-3a through AG-3c recommend amendments to County policies to support agricultural uses by matching the acres converted due to urban development or mining activities with farmland acres of similar quality to those converted at a 1:1 ratio and coordinating regional efforts to preserve farmland in collaboration with entities such as the Central Valley Farmland Trust. Despite this, the overall net loss of important farmlands within the county associated with future urban and rural development within agricultural areas would not be prevented because the protective measures mentioned mainly focus on preserving agricultural lands and agricultural land use designations but would not prohibit urban development of farmlands. Consequently, this would result in a significant and unavoidable impact to the conversion of farmland to non-agricultural uses.

Although future urban growth would be directed away from agricultural lands and toward cities, cities' spheres of influence, and designated urban communities, Williamson Act contracts could be cancelled to speed urban development. The 2030 General Plan contains goals and policies that would support consistency with the Williamson Act program such as Policy AG-2.1, AG-2.4 through AG-2.7, alternative policy AG-2.7, and Policy AG-2.15. However, the General Plan also includes policies for administration of the Williamson Act that could act to decrease the amount of agricultural land protected from conversion to other uses. For this reason, Mitigation Measures AG-2a through AG-2c, which recommend amendments to General Plan policies in order to increase the amount of farmland that would be preserved in the County, would be required. This impact would result in a less than significant impact with mitigation incorporated.

Implementation of the 2030 General Plan would permit the minor subdivision of rural parcels into four or fewer lots which would lead to the conversion of farmlands to non-agricultural uses or conflict with continued agricultural operations. The 2030 General Plan contains goals and policies, such as Policies AG-2.12, AG-2.13, AG-3.1 through AG-3.5, AG-3.7, and LU-2.1 through LU-2.4, that would mitigate this by buffering agricultural activities from other sensitive land uses. However, these policies would focus primarily on the urban edge and the effects of urban development on agricultural activities. The effect of scattered residences within active agricultural districts can have significant countywide effect throughout the larger agricultural region of the country. For this reason, implementation of Mitigation Measures AG-5a through AG-5h, which recommend amendments of policies and the addition of programs which would essentially minimize farmland conversion to non-agricultural uses, reduce potential interference with continued agricultural operations, and reduce health risks to future residents

within productive agricultural areas. Despite these measures, the impact of rural minor subdivisions on agricultural production and health risks would remain significant and unavoidable under the 2030 General Plan. Thus, this impact would be significant and unavoidable.

There is no forest land, timberland, or timberland production areas, as zoned by applicable state regulations, exist within Merced County, the proposed 2030 General Plan would not conflict with forest land zoning. Therefore, no impacts would occur related to forest land resources. Due to the General Plan implementation's potential to convert important farmlands to non-agricultural uses, demand for groundwater or surface water in rural areas of Merced County would increase. However, because the potential water use from rural residences within minor subdivisions would approximately equal or be less than the current crop usage for the same area, this would be a less than significant impact. Additionally, the General Plan implementation would not result in significant conversion of farmland to non-agricultural uses due to inadequate parcel sizes because the increase in the minimum parcel size from 20 acres under the 2000 Merced County General Plan to 40 acres under the 2030 General Plan would result in more efficient agricultural operations. Therefore, this would be a less than significant impact.

The General Plan EIR also reveals significant and unavoidable impacts on agricultural resources, including the conversion of important farmland to non-agricultural uses due to urban development and minor subdivision activities. While the 2030 General Plan aims to limit new development in rural areas, scattered farmland conversion may still occur over time, particularly near existing urban areas. Despite efforts to mitigate impacts, the cumulative loss of agricultural resources is expected to be considerable, as decisions by surrounding municipalities also influence land use changes.

Addendum Analysis

The General Plan goals and policies aim to focus new growth and development at infill locations and to protect open space areas and agricultural lands. Mitigation measures in the General Plan EIR, included as policies in the General Plan, would be implemented to help reduce impacts to the greatest extent possible. These policies and actions would be required with implementation of the Housing Element Update.

The Housing Element Update is a policy document consistent with the General Plan. The Housing Element Update inventory sites located throughout the County were evaluated previously for potential environmental impacts in the General Plan EIR. The Housing Element Update also includes ADUs, and projects that are approved or pending that have already undergone environmental analysis, if required. The project aims to help the County achieve the General Plan's vision, meet the necessary housing demands, and fulfill its share of the RHNA for the 6th Cycle Housing Element.

Goals and policies in the 2030 General Plan that were referenced in the General Plan EIR, such as Policies AG-2.1 through AG-2.7, Alternative Policy AG-2.7, Policies AG-2.8, AG-2.9, AG-2.11 through AG-2.16, AG-3.1 through AG-3.5, AG-3.7 through AG-3.11, LU-1.1, LU-1.2, LU-1.4, LU-1.5, LU-2.1 through LU-2.4, LU-2.6, LU-2.9, LU-4.1 through LU-4.3, LU-5.A.1, LU-5.F.1, LU-7.1, NR-3.10, NR-3.11, and NR-3.13, would reduce impacts to the furthest extent possible. Furthermore, Mitigation Measures AG-1a through AG-1c, AG-2a through AG-2c, AG-3a through AG-3c, and AG-5a through AG-5h, which were adopted along with the General Plan EIR, would supplement the General Plan goals and policies to reduce impacts to the furthest extent possible. These mitigation measures recommend amendments to General Plan policies and the addition of programs to: support agricultural uses by matching the acres converted due to urban development or mining activities with farmland acres of similar quality to those converted at a 1:1 ratio and coordinating regional efforts to preserve farmland in collaboration with entities such as the Central Valley Farmland Trust, to increase the amount of farmland that would be preserved in the

County, and to essentially minimize farmland conversion to non-agricultural uses, reduce potential interference with continued agricultural operations, and reduce health risks to future residents within productive agricultural areas. These goals, policies, and measures would continue to be required with implementation of the proposed project.

Additionally, because it is a policy document, the Housing Element Update would not, in and of itself, result in impacts to farmland. The Housing Element Update does not include a specific projects involving a new housing development, but puts forth goals and policies that support housing efforts in Merced County consistent with the overall vision of the General Plan.

Future development facilitated by the Housing Element Update would undergo project-specific developmental review, including design review, and would be subject to adopted development regulations. The proposed project would implement the 2030 General Plan, thereby resulting in the same agriculture and forestry impacts from new development as evaluated in the certified EIR.

Conclusion

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

6.3 Air Quality

General Plan EIR Findings

The General Plan EIR determined that construction associated with the buildout of the 2030 General Plan is expected to produce short-term air emissions, primarily from construction vehicles and equipment generating exhaust emissions and fugitive dust. However, these emissions are regulated by various agencies and programs such as the Air Resources Board (ARB) and the San Joaquin Valley Air Pollution Control District (SJVAPCD). The 2030 General Plan includes goals and policies such as Goal AQ-2 and AQ-6, and Policies AQ-2.7 and AQ-6.1 aimed to avoid or reduce impacts from construction emissions. The combination of the existing regulations and policies outlined in the 2030 General Plan would ensure that construction emissions are reduced to a less than significant level.

Implementation of the 2030 General Plan buildout would lead to long-term operational emissions ROG, NO_x, CO, and SO_x from on-road vehicles, agricultural sources, and area sources. However, due to anticipated improvements in emission control technology, these emissions are expected to be less than significant. Nonetheless, the 2030 General Plan includes goals and policies aimed at further reducing these long-term operational emissions these include; Goal AQ-2, Policies AQ-2.1 through AQ-2.7, Goal AQ-3, Policies AQ-3.1 through AQ-3.4, Goal AQ-4, Policies AQ-4.1 through AQ-4.7, Goal AQ-6, Policies AQ-6.1 through AQ-6.5. The General Plan EIR determined that these policies, combined with improvements in motor vehicle exhaust controls, would result in a net decrease in emissions of ROG, NO_x, CO, with only a minor increase in SO_x emissions between 2010 and 2030.

The buildout of the 2030 General Plan would lead to a significant increase in operational emissions of PM₁₀ and PM_{2.5} from various sources, including on-road vehicles, agricultural activities, and area sources. This increase would surpass the significance thresholds set by the SJVAPCD, making it a potentially significant impact. To address this, several mitigation measures are proposed, including policy amendments to AQ-2.2 and adding Policies AQ-6.6 and AQ-6.7 which prohibit wood stoves in

newly constructed residences with access to natural gas and requires owners of residences with existing wood stoves to upgrade to stoves that meet EPA certified Phase II emission standards. However, even with these measures, the net increase in PM10 emissions in 2030 would still exceed the SJVAPCD's significance threshold, resulting in a significant and unavoidable impact.

The General Plan EIR determined the 2030 General Plan could potentially expose sensitive receptors, such as residences, to significant concentrations of toxic air contaminants (TACs) due to their proximity to high-volume roads. Recommendations from ARB suggest maintaining a minimum distance between sensitive land uses and sources of TACs, such as high-volume roads. However, several areas within unincorporated Merced County that are designated for residential land use, are adjacent to roads with high traffic volumes, such as Interstate 5 and State Route 99. To mitigate this, several Policies are proposed for the Air Quality Element including Goal AQ-5 and Policies AQ-5.1 and AQ-5.2 which amends the development review process and requires effective buffers between residential areas and sources of hazardous air emissions. With the implementation of these measures, the impact is deemed less than significant.

The General Plan EIR indicated that the 2030 General Plan could potentially expose sensitive receptors, such as residences, to substantial concentrations of toxic air contaminants (TACs) and odors due to their proximity to sources like industrial, commercial, and agricultural activities. However, with the incorporation Policies AG-3.3, AG-3.4, and AG-3.9 and in combination with existing programs aimed at avoiding exposure to odors and TACs, this impact is considered less than significant. Additionally, the buildout of the 2030 General Plan would not increase overall Carbon Monoxide (CO) emissions.

Addendum Analysis

The proposed project would be updating the Housing Element of the 2030 General Plan. The Air Quality Element of the County's 2030 General Plan includes the following goals and policies:

Goal AQ-1: Reduce air pollutants and greenhouse gas emissions and anticipate adaptation due to future consequences of global and local climate change.

Policy AQ-1.1: Energy Consumption Reduction (RDR). Encourage new residential, commercial, and industrial development to reduce air quality impacts from energy consumption.

Policy AQ-1.7: Heat Island Effect Reduction (RDR). Require increased tree canopy and reflective surface materials in order to reduce the heat island effect.

Goal AQ-2: Mitigate significant local and regional air quality impacts of projects through the CEQA process.

Policy AQ-2.1: Air Quality Plan Compliance (RDR). Require all development projects to comply with applicable regional air quality plans and policies.

Policy AQ-2.3: Cumulative Impacts (RDR). Encourage the reduction of cumulative air quality impacts produced by projects that are not significant by themselves, but result in cumulatively significant impacts in combination with other development.

Policy AQ-2.7: Air District Best Performance Standards (RDR). Require the County to use the Best Performance Standards adopted by SJVAPCD during the development review and decision-making process to ensure new projects meet the targets set by the district.

Goal AQ-4: Reduce traffic congestion and vehicle trips through more efficient infrastructure and support for trip reduction programs.

- Policy AQ-4.1: Decrease Vehicle Miles Traveled (RDR).** Require diverse, higher-density land uses (e.g., mixed-use and infill development) to decrease vehicle miles traveled.
- Policy AQ-4.2: Increasing Road Capacity (RDR).** Increase the efficiency of the existing road network prior to constructing additional capacity.
- Policy AQ-4.3: Public Transport Use Incentives (RDR, PSR).** Prepare incentives and programs to encourage use of public transit and decrease vehicle miles traveled.
- Policy AQ-4.6: Non-Motorized Transportation (RDR).** Encourage non-motorized transportation corridors within and between communities.
- Policy AQ-4.7: Planning Integration (RDR).** Require land use, transportation, and air quality planning to be integrated for the most efficient use of resources and a healthier environment.

The project would be consistent with the programs and policies outlined within the 2030 General Plan and would not authorize new areas for development beyond what has been identified by the 2030 General Plan maximum buildout or areas not currently designated for non-urban uses.

Future development proposed in Merced County would be required to conform with County Code which includes all applicable regulations and SJVACPD policies and programs that relate to air quality and consistency with both the 2018 PM_{2.5} Plan and the 2022 Ozone Plan. Therefore, the Housing Element Update would not conflict with or obstruct implementation of an air quality plan.

The Air Quality Element of the County's 2030 General Plan includes the goals and policies listed above, in addition to the following goals and policies, which would be implemented for any future housing project accommodated under the Housing Element, for the purposes of reducing exposure to air quality criteria pollutants:

Goal AQ-5: County residents are protected from toxic air pollutants and noxious odors from industrial, manufacturing, and processing facilities, and agricultural operations.

- Policy AQ-5.1: Residential Buffers (RDR).** Require effective buffers between residential and other sensitive land uses, and non-residential land uses that generate hazardous air emissions. Effective buffers shall be determined by requiring consultation with the SJVAPCD for any project that may have a health risk impact, including those projects that would otherwise appear to be exempt from CEQA requirements.
- Policy AQ-5.2: New Point Sources (RDR).** Require new air pollution point sources such as, but not limited to, industrial, manufacturing, and processing facilities to be located an adequate distance from residential areas and other sensitive receptors.

Goal AQ-6: Improve air quality in Merced County by reducing emissions of PM₁₀, PM_{2.5}, and other particulates from mobile and non-mobile sources.

- Policy AQ-6.1: Particulate Emissions from Construction (IGC).** Support the San Joaquin Valley Air Pollution Control District's efforts to reduce particulate emissions from construction, grading, excavation, and demolition to the maximum extent feasible and consistent with State and Federal regulations.

- Policy AQ-6.2: Particulate Emissions from County Roads (RDR).** Require PM₁₀ and PM_{2.5} emission reductions on County-maintained roads to the maximum extent feasible and consistent with State and Federal regulations.
- Policy AQ-6.4: Industrial Best Management Practices (RDR, JP).** Require industrial facilities to incorporate economically feasible Best Management Practices and control technology to reduce PM₁₀ and PM_{2.5} emissions consistent with State and Federal regulations.
- Policy AQ-6.6: Prohibition on Wood Stoves (RDR/MPSP).** Prohibit wood stoves and wood burning heaters in all newly constructed residences in unincorporated Merced County that have access to natural gas. Natural gas stoves have substantially lower PM₁₀ and PM_{2.5} emissions as compared to wood stoves.
- Policy AQ-6.7: Stove Replacement (RDR/MPSP/SO).** Require owners of existing wood stoves, or wood burning heaters or fireplaces to remove such wood appliances, upgrade existing stoves to meet EPA certified Phase II emission standards, or replace existing wood stoves with natural gas fired stoves upon sale or major reconstruction of the residence as defined for non-conforming structures in the Merced County Zoning Code if the residence has access to natural gas.
- Policy AQ-6.8: Voluntary Emissions Reduction Agreement (RDR/IGC).** Require all project applicants, where project emissions for any criteria pollutant have been evaluated to exceed SJVAPCD significance thresholds, to consult with the SJVAPCD regarding the establishment of a Voluntary Emissions Reduction Agreement between the applicant and the SJVAPCD. Support the SJVAPCD in its effort to fund the Emission Reduction Incentive Program.

SJVAPCD is required to monitor air pollutant levels to ensure that air quality standards are met and, if they are not met, to develop strategies to meet the standards. Depending on whether the standards are met or exceeded, the local air basin is classified as being in “attainment” or “non-attainment.” The Basin is currently in non-attainment for the federal and State 8-hour ozone standards, the State 1-hour ozone standard (severe non-attainment), State and federal PM_{2.5} standards, and the State PM₁₀ standard. The Basin is in attainment or unclassified for all other standards. SJVAPCD has prepared and adopted a number of Air Quality Management Plans (AQMPs) for ozone (e.g., 2022 Plan for the 2015 8-Hour Standard) and particulate matter (e.g., 2018 PM_{2.5} Plan for the San Joaquin Valley) (SJVAPCD 2022; 2018).

The project would be consistent with the programs and policies outlined within the 2030 General Plan and would not facilitate new areas for development beyond what has been analyzed by the General Plan EIR. The increased residential development in the areas could increase VMT and associated vehicle emissions in the region but since the 2030 General Plan adoption, there have been more stringent federal and state air quality regulatory framework changes to minimize air emissions. These regulations include emissions limits from point and mobile sources and increased requirements from control measures which did not exist in law at the time of the 2030 General Plan adoption. Implementation of these requirements in future development projects facilitated by the Housing Element would reduce potential emissions of urbanized land uses through planned growth that includes higher density residential in existing urban areas. Therefore, the buildout associated with the Housing Element would fall within the buildout numbers that were previously analyzed, thereby resulting in the same air quality impacts from new development, including exposure to criteria pollutants, as evaluated in the General

Plan EIR. In addition, the proposed project would not result in increased density or more development than was envisioned in the 2030 General Plan.

The Housing Element Update project, in and of itself, does not propose specific projects. Because it is a regulatory update, the Housing Element Update would not, in and of itself, result in impacts to air quality thresholds such as net increase of criteria pollutants, exposure of sensitive receptors to pollutant concentrations, and the creation of objectionable odors. Future development facilitated by the Housing Element Update would undergo project-specific developmental review, including design review, and would be subject to adopted development standards.

Table 6 of SJVAPCD's *2015 Guidance for Assessing and Mitigating Air Quality Impacts* lists land uses associated with odor complaints (SJVAPCD 2015). The land uses in the table include wastewater treatment facilities, sanitary landfills, transfer stations, manufacturing plants, food processing facilities, and dairy operations, as well as other industrial uses. The Merced County Zoning Code includes Chapter 18.40.060, Odor, within Article 3, which states that no use shall emit any offensive odor off-site based on typical human reaction except normal odor associated with certain uses that are allowed in agricultural areas (i.e., animal confinement facilities). Further, the County's Division of Environmental Health determines whether the off-site odor is offensive or causes a nuisance. This standard does not apply to existing agricultural and right-to-farm land uses. The project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people as housing developments and developments as a result of the Housing Element Update are not associated with causing odor emissions that adversely affect a substantial number of people. Consistent with the General Plan EIR, impacts would be less than significant.

Table 6 SJVAPCD Thresholds of Significance – Criteria Pollutant Emissions

Pollutant/Precursor	Construction Emissions (tons/year)	Operational Emissions (tons/year)
CO	100	100
Nitrogen Oxides (NO _x)	10	10
Reactive Organic Gases (ROG)	10	10
Sulfur Oxides (SO _x)	27	27
PM ₁₀	15	15
PM _{2.5}	15	15
Ambient Air Quality - Screening Threshold		
Maximum emission of any criteria pollutant	100 pounds/day	

Source: SJVAPCD 2015

The proposed project is a planning document designed to address the county's housing needs. While the proposed Housing Element Update is designed to facilitate the development of housing in order to meet anticipated population growth, the implementation of the Housing Element Update is not expected to induce growth. The purpose of the Housing Element Update project is to ensure that sufficient sites are available and that existing constraints are reduced or removed in order to encourage housing production to meet the expected housing needs in the region and the County specifically. The proposed project would ensure adequate land is made available with appropriate zoning to allow the County to meet its RHNA. No specific developments are being approved as part of the project. Therefore, the project, in itself, would not directly or indirectly result in air quality impacts.

Conclusion

The adoption of the Housing Element Update would not result in air quality 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 project and no additional environmental assessment of air quality is required.

6.4 Biological Resources

General Plan EIR Findings

The General Plan EIR determined that implementation of the 2030 General Plan could lead to significant and unavoidable impacts to special status species and sensitive habitats due to the conversion of farmlands and open space. Implementation of the 2030 General Plan would allow for conversion of farmlands and open spaces for residential growth and other developments, which could directly or indirectly impact special status species and critical habitats. The General Plan EIR implements mitigation measures BIO-1a through BIO-1r and the following General Plan Policies: Policies LU-3.4, LU-4.4, LU-4.7, LU-5.B.4, LU-5.F.1, LU-7.1, LU-10.11, LU-10.12, NR-1.1 through NR-1.17, NR-1.19, NR-3.7 through NR-3.9, and NR-3.12.

One of the major policy themes of the proposed 2030 General Plan is the avoidance of potential biological resources and other impacts of development within rural areas by guiding future urban development to existing urban areas, and by establishing a number of policies to reduce the potential effects of such development on sensitive biological resources. Implementation of Mitigation Measures BIO-1a and BIO-1b would result in a further reduction in the potential for new development and related infrastructure to result in adverse biological effects by aligning the County's standards and requirements with those of state and federal resource management agencies.

Mitigation Measures BIO-1c through BIO-1d reestablish the policies that support the County's Open Space Development Review System. Mitigation Measure BIO-1f addresses mercury issues associated with past mining activities, and Mitigation Measure BIO-1g establishes a program to educate land owners regarding their responsibilities under state and federal environmental laws. Measures BIO-1h, and BIO-1i would strengthen resource protection by limiting potential land uses in sensitive habitat areas or requiring full mitigation for potential effects to biological or other open space resources.

Measures BIO-1j, BIO-1k, and BIO-1n amend County procedures to ensure that sensitive biological and other open space resources are considered in the County's project review processes. Measure BIO-1l and measure BIO-1m increase habitat protection by limiting developed land uses in the vicinity of sensitive habitats. Measures BIO- 1o through BIO-1r clarify the County's obligation to consult with state and federal regulatory agencies in assessing effects to biological resources and the development of mitigation for any adverse effects. However, because proposed general plan policies would still permit the loss of significant amounts of undeveloped and rural land to developed uses within new towns, and from scattered rural residential uses, agriculturally related industries, energy facilities, and surface mines, and because the effect of proposed policies would protect only an amount of rural land equal to that lost, implementation of the 2030 General Plan may result in the unmitigated loss of habitat. Thus, this impact would be significant and unavoidable.

The General Plan EIR determined that impacts to vernal pools and other water bodies may be mitigated to a less-than-significant level with the acquisition of permits and the implementation of mitigation required by federal Clean Water Act Sections 401 and 404 and California Fish and Game Code Section 1601, there is no guarantee that riparian or other "sensitive" habitats such as grasslands would similarly

be mitigated to a less-than-significant level since there are no such permits required for those resources, and no 2030 General Plan Policies would require no net loss for such resources. Because the General Plan Policies would still permit the loss of significant amounts of undeveloped and rural land to developed uses within designated urban areas, and from scattered rural residential uses, agriculturally related industries, energy facilities, and surface mines, and the effect of proposed policies would protect only an amount of rural land equal to that lost, implementation of the 2030 General Plan may result in the unmitigated loss of habitat within riparian and grassland habitats. Thus, impacts to wetlands, riparian habitat, and other sensitive natural communities would be significant and unavoidable.

The General plan EIR determined a less than significant impact with mitigation incorporated to the substantial loss and/or modification of federally protected wetlands through implementation of General Plan Policies and Mitigation Measures BIO-1a through BIO-1r would require identification and protection of federally protected wetland habitat, consistent with federal no-net loss requirements.

Regarding potential interference with animal movement and migration patterns the General Plan EIR determined impacts would be less than significant with mitigation incorporated. Subsequently, the General Plan EIR implements the following General Plan Policies NR 1.6 and NR 1.10, and Mitigation Measures BIO-4a through BIO- 4d. The General Plan EIR determined no impacts in relation to conflicts with any local policies or ordinances protecting biological resources and a less than significant impact regarding conflicts with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan as General Plan Policies LU-10.12, NR-1.10, NR-1.11, NR-1.17 through NR-1.19 support state and federal preservation programs, and no provisions of the 2030 General Plan would conflict with the existing Habitat Conservation Plans.

Addendum Analysis

The proposed project would update the Housing Element in the 2030 General Plan. The 2030 General Plan includes policies related to the protection of biological resources. These policies include:

- Policy NR-1.1: Habitat Protection.** Identify areas that have significant long-term habitat and wetland values including riparian corridors, wetlands, grasslands, rivers and waterways, oak woodlands, vernal pools, and wildlife movement and migration corridors, and provide information to landowners.
- Policy NR-1.2: Protected Natural Lands.** Identify and support methods to increase the acreage of protected natural lands and special habitats, including but not limited to, wetlands, grasslands, vernal pools, and wildlife movement and migration corridors, potentially through the use of conservation easements.
- Policy NR-1.3: Forest Protection.** Preserve forests, particularly oak woodlands, to protect them from degradation, encroachment, or loss.
- Policy NR-1.5: Wetland and Riparian Habitat Buffer.** Identify wetlands and riparian habitat areas and designate a buffer zone around each area sufficient to protect them from degradation, encroachment, or loss.
- Policy NR-1.6: Terrestrial Wildlife Mobility.** Encourage property owners within or adjacent to designated habitat connectivity corridors that have been mapped or otherwise identified by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service to manage their lands in accordance with such mapping programs. In the planning and development of public works projects that could physically

interfere with wildlife mobility, the County shall consult with the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service to determine the potential for such effects and implement any feasible mitigation measures.

- Policy NR-1.12: Wetland Avoidance.** Avoid or minimize loss of existing wetland resources by careful placement and construction of any necessary new public utilities and facilities, including roads, railroads, high speed rail, sewage disposal ponds, gas lines, electrical lines, and water/wastewater systems.
- Policy NR-1.13: Wetland Setbacks.** Require an appropriate setback, to be determined during the development review process, for developed and agricultural uses from the delineated edges of wetlands.
- Policy NR-1.14: Temporary Residential Uses.** Ensure that buildings and structures approved for temporary residential use in significant wetland areas are not converted to permanent residential uses.
- Policy NR-1.15: Urban Forest Protection and Expansion.** Protect existing trees and encourage the planting of new trees in existing communities. Adopt an Oak Woodland Ordinance that requires trees larger than a specified diameter that are removed to accommodate development be replaced at a set ratio.
- Policy NR-1.16: Hazardous Waste Residual Repository Location.** Require new hazardous waste residual repositories (e.g., contaminated soil facilities) to be located at least a mile from significant wetlands, designated sensitive species habitat, and State and Federal wildlife refuges and management areas.
- Policy NR-1.17: Agency Coordination.** Consult with private, local, State, and Federal agencies to assist in the protection of biological resources and prevention of degradation, encroachment, or loss of resources managed by these agencies.
- Policy NR-1.21: Special Status Species Surveys and Mitigation.** Incorporate the survey standards and mitigation requirements of state and federal resource management agencies for use in the County's review processes for both private and public projects.
- Policy NR-11.11: On-Going Habitat Protection and Monitoring.** Cooperate with local, State, and Federal agencies to ensure that adequate on-going protection and monitoring occurs adjacent to rare and endangered species habitats or within identified significant wetlands.

The project would be consistent with the programs and policies outlined within the General Plan and would not authorize new areas for development beyond what has been identified by the General Plan. The project aims to help the County achieve the General Plan's vision, meet the necessary housing demands, and fulfill its RHNA for the 6th Cycle Housing Element. The changes would not have a substantial adverse effect, either directly or through habitat modifications or a substantial adverse effect on any riparian habitat, and on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. Additionally, the project would not have a substantial adverse effect on state or federally protected wetlands or interfere substantially with the movement of any native resident or migratory fish or wildlife species as the project entails updating the Housing Element. Additionally, the Housing Element Update does not propose or authorize any development.

Moreover, the County does not currently have an adopted tree preservation policy or ordinance and the project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Other than one 120-acre Habitat Conservation Plan for the San Joaquin kit fox in the Santa Nella community in western Merced County, there are no adopted Habitat Conservation Plans or Natural Community Conservation Plans with coverage for any area or activity in Merced County (Merced, 2012). None of the housing opportunity sites are within the Habitat Conservation Plan area for the San Joaquin kit fox in the Santa Nella community. The project would be consistent with the land use pattern and policies of the 2030 General Plan which is consistent with the provisions of this HCP.

Therefore, the proposed project would implement the 2030 General Plan, thereby resulting in similar impacts to biological resources as evaluated in the General Plan EIR.

Conclusion

The adoption of the Housing Element Update would not result in biological 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 projects and no additional environmental assessment of biological resources is required.

6.5 Cultural Resources

General Plan EIR Findings

The General Plan EIR determined that the 2030 General Plan would result in less than significant impacts to cultural resources with the implementation of mitigation measures. Although goals and policies from the Natural Resources and Recreation elements, such as Policies NR-4.1, RCR-2.2, RCR-2.3, RCR-2.4, RCR-2.6, RCR-2.7, and RCR-2.8, would reduce potential cultural resource impacts, additional project specific-measures need to be implemented to further reduce impacts to cultural resources. Mitigation measures CUL-1a through CUL-1c recommend implementation of Historical and Cultural Resources Investigation, Assessment, and Mitigation Guidelines and an amendment to Policy RCR-2.6. These measures would reduce impacts to historical, archaeological, and paleontological resources to be less than significant. The 2030 General Plan would lead to ground-disturbing construction activities due to urban or rural development and would have a potentially significant impact on traditional cultural properties. Policies RCR-2.1, RCR-2.5, and RCR-2.8 along with Mitigation Measure CUL-3, which recommends tribal consultation, would reduce impacts to traditional cultural properties to less than significant.

Addendum Analysis

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

The Housing Element Update is a policy document consistent with the General Plan. The Housing Element Update includes housing sites located throughout the County that were evaluated previously for potential environmental impacts in the General Plan EIR. The Housing Element Update also includes ADUs, and projects that are approved or pending that have already undergone environmental analysis, if required. Although known historic resource sites are located throughout the County, future

development would be evaluated for conformance with the county's General Plan, Municipal Code, and other applicable State and local regulations.

The project aims to help the County achieve the General Plan's vision, meet the necessary housing demands, and fulfill its RHNA for the 6th Cycle Housing Element.

The proposed project would entail updates to the General Plan Housing Element. Thus, the fundamental regulations and requirements of the General Plan and Zoning Code, such as meeting design standards, would still apply. Goals and policies in the 2030 General Plan that were referenced in the General Plan EIR, such as policies NR-4.1 and RCR-2.1 through RCR-2.8, would mitigate impacts. Furthermore, Mitigation Measures CUL-1a through CUL-1c and CUL-3, which were adopted along with the General Plan EIR, would supplement the General Plan goals and policies to reduce impacts to the furthest extent possible. These mitigation measures recommend implementation of Historical and Cultural Resources Investigation, Assessment, Mitigation Guidelines and an amendment to Policy RCR-2.6, and tribal consultation. These goals, policies, and measures would continue to be required with implementation of the proposed project.

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

Future development facilitated by the Housing Element Update would undergo project-specific developmental review, including design review, and would be subject to adopted development regulations. The proposed project would implement the 2030 General Plan, thereby resulting in the same cultural resources impacts from new development as evaluated in the certified EIR.

Conclusion

The adoption of the Housing Element Update does not involve changes to the current adopted land uses. 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 determined that during construction and following buildout of the of the 2030 General Plan, energy would be consumed in the forms of fossil fuels and electricity. However, various goals and policies in the 2030 General Plan, such as Policies AQ-1.1 through AQ-1.6, LU-5.1.5, LU-5.A.6, LU-9.1 through LU-9.5, NR-2.1 through NR-2.5, NR-2.7 through NR-2.12, CIR-1.2, and CIR-1.3, encourage energy efficiency and reduced energy use to reduce inefficient, wasteful, and unnecessary use of energy. Therefore, impacts associated with inefficient use of fuel or energy would be less than significant.

Addendum Analysis

The General Plan goals and policies support reduction of energy use impacts. Policies and actions in the General Plan included as mitigation in the General Plan EIR are implemented to help reduce impacts to the greatest extent possible. These policies and actions would be required with implementation of the Housing Element Update. The proposed project is intended to assist the County in achieving the vision of the existing General Plan and provide the necessary housing units to accommodate the anticipated growth and assist the County in meeting its RHNA for their 6th Cycle Housing Element.

The Housing Element Update is a policy document consistent with the General Plan. The Housing Element Update includes housing sites located throughout the County that were evaluated previously for potential environmental impacts in the General Plan EIR. The Housing Element Update also includes ADUs, and projects that are approved or pending that have already undergone environmental analysis, if required. New projects would be required to adhere to the current California Energy Code and CALGreen standards, which include requirements for the use of more energy-efficient design and technologies as well as the incorporation of more renewable energy resources into building design than the CALGreen standards that were in place during the General Plan EIR analysis. New development would use electricity supplied by PG&E, which sourced almost 40 percent of its electricity in 2023 from renewable resources that qualify under California's Renewable Portfolio Standard (RPS) (California Energy Commission 2023).

The proposed project would update the Housing Element of the General Plan and thus the fundamental regulations and requirements of the General Plan and Zoning Code, such as meeting design standards, would still apply. Goals and policies in the 2030 General Plan that were referenced in the General Plan EIR, such as Policies AQ-1.1 through AQ-1.6, LU-5.1.5, LU-5.A.6, LU-9.1 through LU-9.5, NR-2.1 through NR-2.5, NR-2.7 through NR-2.12, CIR-1.2, and CIR-1.3, would reduce impacts to the furthest extent possible. These goals and policies would continue to be required with implementation of the proposed project.

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

Future development would also be required to comply with policies and actions from the County of Merced's General Plan.

Conclusion

The adoption of the Housing Element Update does not involve changes to the current adopted land uses. 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

The General Plan EIR determined that implementation of the 2030 General Plan would lead to increased urban development, increasing the potential exposure to geologic hazards, including rupture of a fault, ground shaking, and landslides. All applicable projects would be required to comply with the California Building Code and the goals and policies set forth in the 2030 General Plan, such as Policy HS-1 through HS-1.9 and HS-2.18, would minimize potential risk related to rupture of a fault, ground shaking, or landslides, this impact would be less than significant.

The General Plan EIR determined that construction of urban development consistent with the 2030 General Plan would result in an increased potential for soil erosion and loss during construction related soil disturbance activities. Adherence to federal, State, and local requirements along with implementation of the goals and policies set forth in the 2030 General Plan, such as Policy AG-2.4, NR-3.1 through NR-3.3, which act to protect against soil erosion, this impact would be less than significant.

The General Plan EIR determined that construction and operation of urban development and infrastructure associated with the 2030 General Plan could be located on unstable or expansive soils, or exposed to geologic hazards such as landslides, lateral spreading, subsidence, liquefaction, or collapse. All applicable projects would be required to comply with the International Building Code, California Building Code, and the goals and policies set forth in the 2030 General Plan, such as Policy HS-1.6 through HS-1.9, which would discourage construction on steep slopes, prohibit structures in landslide hazard areas, and require adherence to design standards for construction on steep slopes or in areas of unstable soils, this impact would be less than significant.

The General Plan EIR determined that installation and operation of onsite wastewater treatment systems (OWTS) or similar wastewater disposal systems associated with the 2030 General Plan would result in potential degradation of groundwater quality. The goals and policies set forth in the 2030 General Plan, such as Policy W-2.5, PFS-2.5 through PFS-2.7, Program PFS-B, and Program PFS-D would encourage and enforce water quality protection measures as they relate to septic system installation and operation. In addition, incorporation of Mitigation Measures GEO-4a, GEO-4b, and GEO-4c would implement the 2030 General Plan policies listed above to reduce potential groundwater contamination hazards from on-site septic systems. With implementation of Mitigation Measures GEO-4a, GEO-4b, and GEO-4c, impacts would be reduced to a less than significant level. Additionally, implementation of the 2030 General Plan would not result in significant cumulative impacts.

Addendum Analysis

The project aims to help the County achieve the General Plan's vision, meet the necessary housing demands, and fulfill its RHNA for the 6th Cycle Housing Element. Because it is a regulatory update, the Housing Element Update project would not, in and of itself, result in impacts to geology and soils such as causing potential adverse effects involving fault rupture, ground shaking, liquefaction, and landslides. As determined in the General Plan EIR, individual projects under the Housing Element Update would undergo project-specific developmental review, including design review, and would be subject to adopted development regulations such as the California Building Code and International Building Code's regulations and standards regarding seismic safety of buildings and structures. Additionally, individual projects would be required to adhere to the goals and policies set forth in the 2030 General Plan, including the following:

Goal HS-1: Minimize the loss of life, injury, and property damage of county residents due to seismic and geologic hazards.

- Policy HS-1:** **Structure Location and Compliance (RDR).** Require that all new habitable structures be located and designed in compliance with the Alquist-Priolo Special Studies Zone Act and related State earthquake legislation.
- Policy HS-1.2:** **Financial Assistance for Seismic Upgrades (RDR/FB).** Support efforts to obtain financial assistance from Federal and State agencies in order to implement corrective seismic safety measures required for existing County buildings and structures.
- Policy HS-1.3:** **Dam Inundation Areas (RDR).** Require all new structures located within dam inundation areas to conform to standards of dam safety as required by the State Division of Safety of Dams.
- Policy HS-1.4:** **Ensure Earthquake Resistant Design (RDR).** Require earthquake resistant design for proposed critical structures such as hospitals, fire stations, emergency communication centers, private schools, high occupancy buildings, bridges and freeway overpasses, and dams that are subject to County permitting requirements.
- Policy HS-1.6:** **Landslide Areas (RDR).** Prohibit habitable structures on areas of unconsolidated landslide debris or in areas vulnerable to landslides.
- Policy HS-1.7:** **Hillside Development (RDR).** Discourage construction and grading on slopes in excess of 30 percent.
- Policy HS-1.8:** **Grading Standards (RDR).** Require that the provisions of the International Building Code be used to regulate projects subject to hazards from slope instability.
- Policy HS-1.9:** **Unstable Soils (RDR).** Require and enforce all standards contained in the International Building Code related to construction on unstable soils.
- Policy NR-3.1:** **Soil Erosion and Contamination (RDR).** Require minimal disturbance of vegetation during construction to improve soil stability, reduce erosion, and improve stormwater quality.
- Policy NR-3.3:** **Soil Improvement (RDR).** Encourage landowners to participate in programs that reduce soil erosion and increase soil productivity. This shall include promoting and coordinating the efforts of University of California Cooperative Extension, various Resource Conservation Districts, and other similar agencies and organizations.
- Policy W-2.5:** **Septic Tank Regulation (RDR).** Enforce septic tank and onsite system regulations of the Regional Water Quality Control Board to protect the water quality of surface water bodies and groundwater quality.
- Policy PFS-2.5:** **Ground or Surface Water Contamination (RDR).** Prohibit wastewater disposal facilities that are determined to have the potential to contaminate the groundwater or surface water, on either a site-specific or cumulative basis.
- Policy PFS-2.6:** **Septic System Standards (RDR/MPSP).** Require adequate standards for private septic systems to protect water quality and public health.

Adherence to the goals and policies listed above and applicable regulations would ensure that the Housing Element Update would not result in impacts to geology and soils such as causing potential adverse effects involving fault rupture, ground shaking, liquefaction, and landslides. Therefore, the Housing Element Update would not result in increased geological impacts as just listed. The Housing Element Update would not result in loss of topsoil, cause a geologic unit to become unstable, be located on soils incapable of supporting septic tank use, or destroy a unique paleontological resource. As determined in the General Plan EIR, individual projects under the Housing Element Update would undergo project-specific developmental review, including design review, and would be subject to adopted development regulations such as the California Building Code and International Building Code's regulations and standards regarding seismic safety of buildings and structures.

Mitigation measures GEO-4a, GEO-4b, and GEO-4c would supplement the General Plan goals and policies to reduce impacts to the furthest extent possible. These mitigation measures recommend amendments to General Plan Policies, which would reduce potential groundwater contamination hazards from on-site septic systems. Adherence to the goals, policies, and mitigation measures listed above would ensure that the Housing Element Update would not result in loss of topsoil, cause a geologic unit to become unstable, be located on soils incapable of supporting septic tank use, or destroy unique paleontological resources. Therefore, the Housing Element Update would not result in increased geological impacts related to those impacts listed above. Thus, the Housing Element Update would have the same impacts to geology and soils as discussed in the General Plan EIR.

Conclusion

The adoption of the Housing Element Update would not result in geology and soils 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 proposed project and no additional environmental assessment of geology and soils is required.

6.8 Greenhouse Gas Emissions

General Plan EIR Findings

The General Plan EIR analyzed greenhouse gas emissions (GHG) impacts under the Global Climate Change section. The General Plan EIR determined that implementation of the 2030 General Plan buildout would generate increased amounts of GHG emissions and have significant and unavoidable impacts. The 2030 General Plan includes the following Goals and Policies related to GHG Emissions: Policy AG-4.7, Goal AQ-1, Policies AQ-1.1 through AQ 1-10, Goal LU-5A, Policies LU-5A.5 and LU-5A.6, Goal LU-9, Policies LU-9.1 through LU-9.5, Goal NR-2, Policies NR-2.1 through NR-2.12, Goal CIR-1, Policies CIR-1.2 and CR-1.3. The General Plan EIR also identified Mitigation Measures GHG-1a through GHG-1g. With implementation of the recommended Goals and Policies the 2020 GHG emissions would be reduced by 12.4 percent which is below SJVAPCD's 29 percent significance threshold. Similarly with implantation of the mitigation measures, the 2030 GHG emissions would be reduced by 17.6 percent as compared to 2030 BAU emissions, which is also less than the SJVAPCD significance standard.

Addendum Analysis

The proposed project is intended to assist the County in achieving the vision of the existing General Plan and provide the necessary housing units to accommodate the anticipated growth and assist the County in meeting its share of the RHNA for its 6th Cycle Housing Element.

The 2030 General Plan has been designed to meet the requirements of AB 32, in particular the requirements for local jurisdictions to address sustainability, greenhouse gas emissions reduction, and climate change adaptation. The Air Quality Element of the County's 2030 General Plan includes the following policies which would be implemented through the Housing Element Update:

- Policy AG-4.7: Methane Sequestration (RDR/IGC).** Support efforts of local dairies and the San Joaquin Valley Pollution Control District to develop standards and programs for the sequestration of methane gas in order to reduce greenhouse gas emissions and odors, and to provide a source of clean, efficient, and cheap electricity and natural gas.
- Policy CIR-1.2: Efficient Transportation Network (RDR).** Encourage land use patterns that promote shorter travel distances between residences and employment centers within Merced County, allow for non-auto travel, plan for multi-modal access for communities near I-5 and other major roadways, provide traffic calming on local roadways, and promote the efficient expansion and maintenance of transportation-related infrastructure to avoid constructing new roadways that would cause the physical division of existing communities.
- Policy CIR-1.3: Transportation Efficiency (RDR).** Encourage transportation programs that result in more efficient energy use, reduce greenhouse gas emissions and noise levels, and improve air quality.
- Policy NR-2.7: Residential Rehabilitation and Improvement (RDR).** Encourage the rehabilitation and improvement of existing single-family and multi-family units to achieve greater energy efficiency.
- Policy NR-2.10: Efficiency Education (RDR).** Work with energy providers to educate the public about energy efficiency, water conservation, and other greenhouse gas reduction measures.
- Policy AQ-1.5: Climate Action Plan (RDR, PSR).** Prepare a Climate Action Plan that includes an inventory of 1990 and 2010 greenhouse gas emissions, determines project air quality impacts using analysis methods and significance thresholds recommended by the SJVAPC, and identify strategies to achieve State emission reduction targets.
- Policy AQ-1.10: Public Awareness (IS).** Increase public awareness about climate change and encourage county residents and businesses to become involved in activities and lifestyle changes that will aid in reduction of greenhouse gas emissions.
- Policy AQ-2.2: Development Review Process (RDR).** Use the development review process to achieve measurable reductions in criteria pollutant, toxic air contaminants, and greenhouse gas emissions.

Furthermore, Mitigation Measures GHG-1a through GHG-1g, would reduce GHG emissions impacts to the furthest extent possible. The project would implement the above-mentioned mitigation measures and be consistent with the programs and policies outlined within the 2030 General Plan and would not facilitate new areas for development beyond what has been identified by the General Plan. The Housing Element Update project would have the same impacts to GHG emissions as discussed in the General Plan EIR.

Additionally, the State is also moving forward with climate change initiatives, such as requiring solar installations on new development which began in 2020. The proposed Housing Element Update is not

itself resulting in an increase in population but is intended to accommodate the growth that is likely to occur in the region. Furthermore, impacts to greenhouse gas emissions as a result of population growth would be reduced through the project by placing high density residential in existing urban areas in close proximity to services. This would result in a general reduction to VMT and associated greenhouse gas emissions impacts.

The Housing Element Update would be consistent with the programs and policies outlined within the 2030 General Plan. As noted above, the 2030 General Plan facilitates GHG reductions through policies and plan review. No specific housing developments are being approved as part of the project, nor would adoption of the project analysis directly result in any changes in planned land uses or in the modification of land use policies. Future development facilitated by the Housing Element Update would undergo project-specific developmental review, including design review, and would be subject to adopted development regulations to reduce GHG emissions. The proposed project would implement the 2030 General Plan, thereby resulting in similar impacts to GHG emissions as evaluated in the General Plan EIR.

Conclusion

The adoption of the Housing Element Update would not result in greenhouse gas emissions 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 proposed project and no additional environmental assessment of GHG emissions is required.

6.9 Hazards and Hazardous Materials

General Plan EIR Findings

The General Plan EIR determined that implementation of the 2030 General Plan will likely result in an increase in routine use, transportation, and disposal of hazardous materials, as well as handling of hazardous materials near existing and proposed schools. However, existing federal, State, and local regulations, including General Plan policies such as HS-5.1 through HS-5.6, HS-2.20, LU-7.5, AQ-4.7, and PFS-8.10, create and enforce standards for these activities to reduce impacts to less than significant. Implementation of the 2030 General Plan could result in urban development or other activities located at a location that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Compliance with the General Plan policies and implementation of Mitigation Measure HAZ-3, which recommends a policy amendment that would result in additional protection against hazardous materials releases arising from development of urban uses and infrastructure identified in the 2030 General Plan, impacts would be reduced to less than significant. Implementation of the project could also result in the same activities occurring within an area regulated by the Merced County Airport Land Use Commission's adopted Airport Land Use Plan or in the vicinity of a private airport, and pose a safety hazard for people residing or working in the project area. However, compliance with the General Plan policies and implementation of Mitigation Measure HAZ-4, which recommends the amendment of Policy HS-4.1 to reduce potential hazards near private airstrips by ensuring that development near both public use and private airstrips addresses land use compatibility issues, impacts would be reduced to less than significant. Implementation of the proposed 2030 General Plan would lead to urban development and other activities that would increase the need to expand existing fire protection services, and could expose people or structures to a significant risk of loss, injury, or death involving wildland fires. Because the 2030 General Plan contains specific goals and policies, such as Policy HS-3.1 through HS-3.13, designed to prevent wildfire hazards related to wildland fuel

reduction, emergency response, and design solutions, this would be a less than significant impact. The 2030 General Plan's contribution to regionally significant cumulative impacts related to hazards and hazardous materials would also be less than cumulatively considerable.

Addendum Analysis

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

The Housing Element Update is a policy document consistent with the General Plan. The Housing Element Update includes housing sites located throughout the County that were evaluated previously for potential environmental impacts in the General Plan EIR. The Housing Element Update also includes ADUs, and projects that are approved or pending that have already undergone environmental analysis, if required. The project aims to help the County achieve the General Plan's vision, meet the necessary housing demands, and fulfill its share of the RHNA for the 6th Cycle Housing Element.

The proposed project would update the Housing Element of the General Plan and thus the fundamental regulations and requirements of the General Plan and Zoning Code, such as meeting design standards, would still apply. Goals and policies in the 2030 General Plan that were referenced in the General Plan EIR, such as Policies HS-5.1 through HS-5.6, HS-2.20, LU-7.5, AQ-4.7, PFS-8.10, HS-3.1 through HS-3.13, would reduce impacts to the furthest extent possible. Furthermore, Mitigation Measures HAZ-3 and HAZ-4, which were adopted along with the General Plan EIR, would supplement the General Plan goals and policies to reduce impacts to the furthest extent possible. These mitigation measures recommend policy amendments that would result in additional protection against hazardous materials releases arising from development of urban uses and infrastructure identified in the 2030 General Plan and reduce potential hazards near private airstrips by ensuring that development near both public use and private airstrips addresses land use compatibility issues. These goals, policies, and measures would continue to be required with implementation of the proposed project.

The County requires new projects to analyze potential site-specific hazardous waste impacts pursuant to State regulations. The Housing Element Update, in and of itself, does not include a specific project involving a new housing development, but puts forth goals and policies that support housing efforts in Merced County consistent with the overall vision of the General Plan. Because it is a policy document, the Housing Element Update would not, in and of itself, result in impacts to hazards or hazardous materials. All future development consistent with the Housing Element Update would be required to comply with applicable policies and guidelines regarding hazards and hazardous materials from the Merced County General Plan.

Conclusion

The adoption of the Housing Element Update does not involve changes to the current adopted land uses. 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

The General Plan EIR determined that implementation of the 2030 General Plan would lead to future urban development and other developed land uses that could result in discharges of contaminated water to surface water bodies and groundwater. Because of extensive state and local regulation of discharges, and the goals and policies set forth in the 2030 General Plan, such as Policy NR-3.6, NR-3.7, NR-3.9, W-2.1, W-2.2, W-2.4, W-2.5, W-2.6, W-2.7, and W-2.8, that would minimize the potential for the release of urban pollutants, this impact would be less than significant. Construction of urban development and other activities consistent with the 2030 General Plan could result in the expansion of impervious surfaces, thereby interfering with aquifer recharge and aquifer volumes. A potential decrease in aquifer volumes could adversely affect existing users or habitat needs. Mitigation Measures HYD-2a and HYD 2b recommend amendments to General Plan Policies W-4.1 and LU-5.F.1, which would result in the additional protection of aquifer recharge areas and areas sensitive to groundwater and surface water contamination. Compliance with General Plan Policies LU-4.4, NR-1.1, NR-1.5, NR-1.13, PFS-3.4, W-1.4, W-2.3, and W-4.1 along with the mitigation measures mentioned would reduce the impact of the 2030 General Plan on groundwater supplies. However, many of the actions necessary to successfully manage water resources and use in the county are beyond the control of Merced County government. Due to the uncertainty of future water management efforts to be conducted by these many different entities, insufficient future groundwater supplies may be experienced in portions of the county. Consequently, even with implementation of Mitigation Measures HYD-2a and HYD-2b, and the policies, this impact would remain significant and unavoidable.

Implementation of the 2030 General Plan would lead to continued urban development that could further alter natural drainages or streams, resulting in localized flooding or accelerated erosion and increased sediment loading downstream from increased, concentrated, or redirected runoff. This would be a potentially significant impact. The General Plan contains goals and policies, such as Policies W-2.3, W-4.1, NR-1.1, NR-1.5, NR-3.7, NR-3.9, and HS-2.15, to protect creeks and drainages directly and indirectly through water and watershed protections. Additionally, mitigation measures HYS-3a through HYD-3c recommend General Plan policy amendments which would enhance water resource protection and replenishment, mandate setbacks for structures, paving, or grading near waterways in urban areas, and encourage surface mining operations along the Merced River corridor to design riparian vegetation buffers as per the Merced River Corridor Restoration Plan. Compliance with the relevant policies along with Mitigation Measures 3a through 3c would reduce this impact to less than significant.

The implementation of the 2030 General Plan on storm water runoff would be less than significant by continuing to implement existing policies along with the General Plan Policies PFS-3.1, PFS-3.2, PFS-3.4, PFS-3.5, and PFS-3.6. In addition, the General Plan EIR determined implementation of the 2030 General Plan may also result in increased urban development and other activities to be located in flood hazard areas, thus increasing the exposure and risk of people and property to flood. However, continued enforcement of FEMA standards and the requirements of the flood ordinance, consistency with state requirements, and compliance with the requirements of existing emergency management plans and the CVFPA, coupled with the 2030 General Plan policies such as Policies HS-2.1, HS-2.4 through HS-2.14, HS-2.16, HS-2.17, and HS-2.18 would reduce flood-related impacts to a less than significant level. Additionally, implementation of the 2030 General Plan would not result in significant cumulative impacts.

Addendum Analysis

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

The Housing Element Update is a policy document consistent with the General Plan. The Housing Element Update includes housing sites located throughout the County that were evaluated previously for potential environmental impacts in the General Plan EIR. The Housing Element Update also includes ADUs, and projects that are approved or pending that have already undergone environmental analysis, if required. The project aims to help the County achieve the General Plan's vision, meet the necessary housing demands, and fulfill its RHNA for the 6th Cycle Housing Element.

The proposed project would update the Housing Element of the General Plan and thus the fundamental regulations and requirements of the General Plan and Zoning Code, such as meeting design standards, would still apply. Goals and policies in the 2030 General Plan that were referenced in the General Plan EIR, such as Policies NR-1.1, NR-1.5, NR-1.13, NR-3.6, NR-3.7, NR-3.9, W-1.4, W-2.1 through W-2.8, W-4.1, LU-4.4, PFS-3.1 through PFS-3.6, HS-2.1, and HS-2.4 through HS-2.18, would reduce impacts to the furthest extent possible. Furthermore, Mitigation Measures HYD-2a, HYD-2b, and HYD-3a through HYD-3c, which were adopted along with the General Plan EIR, would supplement the General Plan goals and policies to reduce impacts to the furthest extent possible. These mitigation measures recommend amendments to General Plan Policies, which would result in the additional protection of aquifer recharge areas, areas sensitive to groundwater, and surface water contamination. The policy amendments would also enhance water resource protection and replenishment, mandate setbacks for structures, paving, or grading near waterways in urban areas, and encourage surface mining operations along the Merced River corridor to design riparian vegetation buffers as per the Merced River Corridor Restoration Plan. These goals, policies, and measures would continue to be required with implementation of the proposed project.

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

Conclusion

The adoption of the Housing Element Update does not involve changes to the current adopted land uses. 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

The General Plan EIR determined that implementation of the 2030 General Plan would lead to urban development that could potentially divide an established community. The goals and policies set forth in

the 2030 General Plan, such as Policy LU-1.1, LU-1.7, LU-1.8, LU-1.10, LU-5.A.4, LU-5.A.5, LU-5.B.1, LU-5.B.2, LU-5.B.3, LU-5.B.5, LU-7.1, LU-7.2, LU-7.3, LU-7.6, LU-10.2, CIR-1.2, CIR-1.3, CIR-1.10, CIR-1.22, CIR-3.1, CIR-5.7, PFS-4.4, PFS-5.3, and PFS-5.6, which would prevent development from physically dividing an established community. In addition, incorporation of Mitigation Measures LU-1a and LU-1b would implement the 2030 General Plan policies listed above to prevent dividing an established community. With implementation of Mitigation Measures LU-1a and LU-1b, impacts would be reduced to a less than significant level.

The General Plan EIR determined that implementation of the 2030 General Plan could lead to land use inconsistencies that would conflict with applicable plans, policies, regulations that have jurisdiction over land use within unincorporated Merced County. However, the 2030 General Plan was designed to achieve and promote consistency with the planning documents of surrounding cities and counties. Additionally, the goals and policies set forth in the 2030 General Plan, such as Policy AQ-1.9, AQ-2.1, AQ-4.7, LU-5.A.7, LU-7.5, LU-7.6, LU-7.7, LU-7.11, LU-10.2, LU-10.3, LU-10.6, LU-10.9, LU-10.10, LU-10.11, LU-10.12, LU-10.14, CIR-6.5, CIR-6.8, PFS-4.4, PFS-5.3, PFS-5.6, PFS-5.7, PFS-8.1, PFS-8.7, NR-1.17, NR-3.4, NR-4.2, RCR-1.7, HS-2.2, HS-4.1, HS-5.3, AG-3.2, AG-3.3, and AG-3.4, which require adherence to existing plans and policies of surrounding jurisdictions and encourage development to be done in a manner that does not isolate or lead to the division of communities. Therefore, this impact would be less than significant. Additionally, implementation of the 2030 General Plan would not result in significant cumulative impacts.

Addendum Analysis

The proposed project, in and of itself, would not authorize specific projects. Because it is a regulatory update, the Housing Element Update project would not, in and of itself, result in population growth or development activities which would result in land use impacts such as physically dividing an established community. Future development facilitated by the Housing Element Update would undergo project-specific developmental review, including design review, and would be subject to adopted development standards. Nevertheless, the Housing Element Update would adhere to the 2030 General Plan goals and policies designed to avoid physical division of a community, including the following:

Goal LU-1: Create a countywide land use pattern that enhances the integrity of both urban and rural areas by focusing urban growth towards existing or suitably located new communities.

- Policy LU-1.1** **Countywide Development (RDR/MPSP).** Direct urban development to areas within adopted urban boundaries of cities, Urban Communities, and Highway Interchange Centers in order to preserve productive agriculture, limit urban sprawl, and protect natural resources.
- Policy LU-1.7:** **Compact Development (RDR).** Promote compact development in urban communities that supports pedestrian activity and transit ridership.
- Policy LU-1.8:** **Innovative Development (RDR).** Promote flexibility and innovation through the use of planned unit developments, development agreements, community plans, specific plans, mixed-use projects, and other innovative development and planning techniques.
- Policy LU-1.10:** **Orderly Community Growth (RDR).** Require the orderly, well planned, and balanced growth of the unincorporated communities consistent with the limits imposed by local infrastructure, services, public facilities, and their ability to assimilate growth.

Goal LU-7: Ensure that development in county/city fringe areas is well planned and adequately serviced by necessary public facilities and infrastructure.

- Policy LU-7.1 Infill Development Focus (RDR).** Encourage infill development to occur in cities in order to maximize the use of land within existing urbanized areas, minimize the conversion of productive agricultural land, and minimize environmental impacts associated with new development.
- Policy LU-7.5: Land Use Conflict Reduction (RDR/IGC).** Encourage cities to incorporate in their general plans land use policies that minimize potential conflicts with agriculturally-related industrial operations and other agricultural activities at the urban interface through the provision of appropriate buffers or other measures.
- Policy LU-7.6: Policy Consultation (RDR/IGC).** Promote, within city spheres of influence, consultation between the cities and the County at the staff level in the early stages of preparing general plan amendments and other policy changes that may impact growth or the provision of urban services. Staff consultations, particularly concerning Community Plans or Specific Plans, shall provide for meaningful participation in the policy formulation process and shall seek resolution of issues prior to presentation to the decision-making bodies.
- Policy LU-7.7: Existing Neighborhood Policy Consistency (RDR/IGC).** Encourage cities to incorporate in their general plans County land use policies for communities/neighborhoods that were established previously under County jurisdiction.
- Policy LU-7.11: City Consultation.** Do not approve any discretionary permit for new urban development within a city sphere of influence unless the development proposal has first been referred to the City for consideration of possible annexation pursuant to the policies of this section, and provisions of any applicable City/County memorandum of understanding.
- Policy LU-10.2: County and City Cooperation (RDR/IGC).** Work cooperatively with all cities in the county to encourage each city to adopt and maintain its general plan consistent with the Merced County General Plan. Adopt complementary planning policies through a cooperative planning process to be determined by the respective legislative bodies.

Goal CIR-1: Maintain an efficient roadway system for the movement of people and goods that enhances the physical, economic, and social environment while being safe, efficient, and cost-effective.

- Policy CIR-1.10: Roadway System Coordination (IGC).** Cooperate with the cities within the County, adjacent counties, and State and Federal transportation agencies to coordinate the countywide roadway system, including right-of-way dedication and roadway improvements.
- Policy PFS-4.4: Land Use Compatibility with Solid Waste Facilities (RDR).** Require solid waste facility sites and landfills are protected from encroachment by incompatible land uses, such as schools and homes.
- Policy PFS-5.3: New Transmission and Distribution Lines (RDR/MPSP).** Encourage new transmission and distribution lines within existing utility easements and right-of-ways, joint-use of easements among different utilities.

Policy PFS-5.6: Underground Power Transmission (RDR). Require power transmission and distribution facilities to be located underground within urban communities and residential centers.

Additionally, development facilitated by the Housing Element Update would implement mitigation measures LU-1a and LU-1b which would supplement the General Plan goals and policies to reduce impacts to the furthest extent possible. These mitigation measures recommend amendments to General Plan Policies, which would reduce potential impacts related to physical division of communities.

The Housing Element Update would not conflict with a land use plan or policy. Individual projects associated with Housing Element Update would be required to adhere to the goals and policies set forth in the 2030 General Plan, including the following:

Policy AQ-2.1: Air Quality Plan Compliance (RDR). Require all development projects to comply with applicable regional air quality plans and policies.

Policy LU-7.5: Land Use Conflict Reduction (RDR/IGC). Encourage cities to incorporate in their general plans land use policies that minimize potential conflicts with agriculturally-related industrial operations and other agricultural activities at the urban interface through the provision of appropriate buffers or other measures.

Policy LU-7.6: Policy Consultation (RDR/IGC). Promote, within city spheres of influence, consultation between the cities and the County at the staff level in the early stages of preparing general plan amendments and other policy changes that may impact growth or the provision of urban services. Staff consultations, particularly concerning Community Plans or Specific Plans, shall provide for meaningful participation in the policy formulation process and shall seek resolution of issues prior to presentation to the decision-making bodies.

Policy LU-7.7: Existing Neighborhood Policy Consistency (RDR/IGC). Encourage cities to incorporate in their general plans County land use policies for communities/neighborhoods that were established previously under County jurisdiction.

Policy LU-7.11: City Consultation. Do not approve any discretionary permit for new urban development within a city sphere of influence unless the development proposal has first been referred to the City for consideration of possible annexation pursuant to the policies of this section, and provisions of any applicable City/County memorandum of understanding.

Goal LU-10: Cooperate with other local, regional, state, and federal jurisdictions and agencies in the San Joaquin Valley to achieve mutually-beneficial development, environmental, and economic goals.

Policy LU-10.2: County and City Cooperation (RDR/IGC). Work cooperatively with all cities in the county to encourage each city to adopt and maintain its general plan consistent with the Merced County General Plan. Adopt complementary planning policies through a cooperative planning process to be determined by the respective legislative bodies.

Policy LU-10.6: Community Plan Consistency (RDR/IGC). Update the General Plan for consistency following city adoption of a general or community plan. Any unresolved conflicts between the County and city plans shall be identified for the decision-making

bodies. Establish and maintain land use controls on unincorporated lands within the spheres of influence consistent with the policies of the County General Plan.

- Policy LU-10.9: Air Quality Management Coordination (IGC).** Coordinate with the San Joaquin Air Pollution Control District and affected agencies and neighboring jurisdictions in the San Joaquin Valley Air Basin to ensure regional cooperation on cross-jurisdictional and regional transportation and air quality issues, and to establish parallel air quality programs and implementation measures, such as trip reduction ordinances and indirect source programs.
- Policy LU-10.12: Coordination with State and Federal Agencies (IGC).** Continue to coordinate project review and permitting activities with applicable State and Federal regulatory agencies.
- Policy LU-10.13: Coordination with Regional Blueprint Planning Efforts (IGC).** Continue to participate in regional planning efforts with the Merced County Association of Governments and other State partnerships.
- Policy CIR-6.5: Airport Land Use Compatibility Plan (RDR).** Review building permits and discretionary applications in areas subject to potential safety or noise impacts from public airports to assure compatibility with the Merced County Airport Land Use Compatibility Plan or other adopted ALUC plans.
- Policy PFS-4.4: Land Use Compatibility with Solid Waste Facilities (RDR).** Require solid waste facility sites and landfills are protected from encroachment by incompatible land uses, such as schools and homes.
- Policy PFS-5.3: New Transmission and Distribution Lines (RDR/MPSP).** Encourage new transmission and distribution lines within existing utility easements and right-of-ways, joint-use of easements among different utilities.
- Policy PFS-5.6: Underground Power Transmission (RDR).** Require power transmission and distribution facilities to be located underground within urban communities and residential centers.
- Policy PFS-5.7: Utility System Expansion (RDR/JP).** Coordinate with local gas and electric utility companies in the design and location, and appropriate expansion of gas and electric systems, while minimizing impacts to agriculture and minimizing noise, electromagnetic, visual, and other impacts on residents.
- Policy PFS-8.1: Coordination with School Districts (IGC/SO).** Collaborate with school districts related to school facility planning issues by:
- a. Identifying trends in school enrollment and development to identify future changes in enrollment and ensure that school locations and attendance boundaries enhance communities;
 - b. Encouraging policies to promote logical school district boundaries within a community; and
 - c. Working with school districts during local planning processes and review of development proposals in regard to alternative funding needed for school facilities.

- Policy PFS-8.7: Incompatible Land Uses near Schools (RDR/IGC).** Coordinate with school districts to reduce the effects of incompatible land uses and noise adjacent to school facilities.
- Policy NR-1.17: Agency Coordination (MPSP/IGC/JP).** Coordinate with private, local, State, and Federal agencies to assist in the protection of biological resources and prevention of degradation, encroachment, or loss of resources managed by these agencies.
- Policy NR-3.4: New Development Compatibility (RDR).** Ensure that new development is compatible with existing and potential surface mining areas and operations as identified on the Mineral Resource Zone Maps prepared by the State Division of Mines and Geology and other mineral resource areas identified by the County. The County shall:
- a. Require development applicants near identified mineral resources to prepare a statement that specifies why the County should permit the proposed land use and describe how the benefits of the proposed use would clearly outweigh the impacts that may limit the potential to extract mineral resources in that area.
 - b. Require new incompatible land uses adjacent to existing mining operations to provide a buffer between the development and adjacent mining operations adequate to mitigate significant impacts to mineral land uses. The buffer distance shall be based on an evaluation of noise, aesthetics, drainage, operating conditions, biological resources, topography, lighting, traffic, operating hours, and air quality.
 - c. Require written notification to be sent to mining operators and subject landowners of land use entitlement applications for potentially incompatible land uses in areas where mining operations are currently taking place.
- Policy HS-4.1: Airport Land Use Compatibility Plan (RDR).** Require that development around airports be consistent with the safety policies and land use compatibility guidelines contained in the Merced County Airport Land Use Commission’s adopted Airport Land Use Compatibility Plan.
- Policy HS-5.3: Incompatible Land Uses (RDR).** Prohibit incompatible land uses near properties that produce or store hazardous waste.

Goal AG-3: Minimize conflicts between productive agricultural areas and urban land uses, and discourage the parcelization and conversion of large agricultural holdings into rural residential parcels or urban uses.

- Policy AG-3.2: Agricultural Buffer (RDR).** Require buffers between proposed non-agricultural uses and adjacent productive agricultural operations to protect farms, dairies, and agricultural-related production facilities from conflicts with non-agricultural uses, specifically residential development.
- Policy AG-3.3: Agricultural Buffer Standards (RDR).** Establish agricultural buffer standards based on type of agricultural operation to be applied to residential development proposals adjacent to productive agricultural land and agricultural-related facilities.

Policy AG-3.4: Residential Buffers from Agriculture (RDR). Require a minimum 200-foot buffer between new residential development and existing agricultural operations, and establish design/maintenance guidelines for developers and property owners.

Adherence to the goals and policies listed above would ensure that the Housing Element Update would not conflict with a land use plan or policy. Therefore, the Housing Element Update would not result in increased land use and planning impacts related to conflicting with land use plans or policies. Thus, the Housing Element Update would have the same impacts to land use and planning as discussed in the General Plan EIR.

Conclusion

The adoption of the Housing Element Update would not result in land use and planning 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 proposed project and no additional environmental assessment of land use and planning is required.

6.12 Mineral Resources

General Plan EIR Findings

The General Plan EIR determined that the 2030 General Plan would not result in the loss of availability of a known mineral resource or of a locally important mineral resource recovery site. Policies NR-3.4 through NR-3.13 provide guidance for mining activities in the county, both in the preservation of mineral resources for future extraction and in mitigating the adverse effects of mining.

Addendum Analysis

The proposed project would update the 2030 General Plan's Housing Element. The county's primary mineral resources are sand and gravel mining operations (County of Merced 2012). As such, significant aggregate deposits are concentrated along the San Joaquin River and its tributaries. The Natural Resources Element of the Merced County General Plan include the following policies related to mineral resources:

- Policy NR-3.4: New Development Compatibility (RDR).** Ensure that new development is compatible with existing and potential surface mining areas and operations as identified on the Mineral Resource Zone Maps prepared by the State Division of Mines and Geology and other mineral resource areas identified by the County. The County shall:
- a. Require development applicants near identified mineral resources to prepare a statement that specifies why the County should permit the proposed land use and describe how the benefits of the proposed use would clearly outweigh the impacts that may limit the potential to extract mineral resources in that area.
 - b. Require new incompatible land uses adjacent to existing mining operations to provide a buffer between the development and adjacent mining operations adequate to mitigate significant impacts to mineral land uses. The buffer distance shall be based on an evaluation of noise, aesthetics, drainage,

- operating conditions, biological resources, topography, lighting, traffic, operating hours, and air quality.
- c. Require written notification to be sent to mining operators and subject landowners of land use entitlement applications for potentially incompatible land uses in areas where mining operations are currently taking place.

Policy NR-3.5: Mineral Resource Protection (RDR). Require areas identified with mineral deposits on either the State Mine Land Classification Maps provided by the State Mining and Geology Board's Classification Report, or site-specific information, remain protected for possible future mineral extraction. Impose conditions upon new incompatible land uses in areas surrounding identified mineral deposits for the purpose of mitigating significant land use conflicts prior to approving a use that would otherwise be incompatible with mineral extraction. The identified mineral deposit may be determined by the classification maps, Classification Report, separate County maps, or on a site-specific basis.

Policy NR-3.6: Buffers between Mining Operations and Adjacent Uses (RDR). Require operators of new mines to provide buffers or physical barriers between the mining operation and any existing nearby incompatible land uses when a significant impact is identified during the development review process.

Policy NR-3.7: Merced River Corridor Buffers (RDR). Require surface mining operations in dredge tailing areas along the Merced River corridor to design riparian vegetation buffers consistent with the Merced River Corridor Restoration Plan.

The proposed project would not involve changes to mineral resource recovery sites or alter or displace any mineral resource activities. The proposed project would facilitate housing development and achieve consistency with the General Plan. The proposed project would not allow new development in areas where such development is prohibited under the General Plan. Therefore, the proposed project would implement the 2030 General Plan, thereby resulting in similar impacts to mineral resources as evaluated in the General Plan EIR.

Conclusion

The adoption of the Housing Element Update would not involve changes to mineral resource recovery sites or alter or displace any mineral resource activities. The proposed project would not result in mineral resource 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 proposed project and no additional environmental assessment of mineral resources is required.

6.13 Noise

General Plan EIR Findings

The General Plan EIR determined that future development and implementation of the policies in the 2030 General Plan would result in exposure of excessive ambient noise levels within areas containing noise sensitive land uses. However, with the implementation of General Plan Policies HS-7.2 through HS-7.13, the potential for noise levels, both near existing sensitive land uses and noise-sensitive land uses within areas subject to noise impacts, to exceed standards would be reduced. Implementation of the

2030 Draft General Plan would result in greater traffic volumes on county roadways than currently exist. The greater traffic volumes would result in increased traffic noise on county roadways, which may exceed thresholds for acceptable noise exposure at existing noise-sensitive land uses within the county. Because of the potential for exceedance and the uncertainty of implementing effective mitigation, this impact would be potentially significant. Mitigation Measures NSE-4a and 4b recommend the addition of Policy HS-7.14 and Program HS-L which would reduce transportation noise impacts. Nonetheless, despite the implementation of the mitigation measures, it is not possible to ensure that all affected existing residential uses would not be exposed to future traffic noise levels exceeding the County's noise standards, or significantly exceeding the levels they are exposed to today. In addition, busy streets tend to also serve commercial uses, so restricting trucks on the busier streets may be impractical or illegal. Thus, impacts related to transportation noise remain significant and unavoidable.

Existing and future sensitive receptors could be exposed to groundborne vibration or noise as a result of the 2030 General Plan implementation. Even with implementation of the noise policies of the 2030 General Plan, because new development could be located near existing sources of groundborne vibration or noise, or existing development could be exposed to new sources, this would be a potentially significant impact. Mitigation Measures NSE-5a through NSE-5f would be required in order to reduce the impacts of groundborne vibration or noise. These measures would result in additional protection against adverse levels of vibration arising from the development of urban uses and infrastructure identified in the 2030 General Plan. This impact would be reduced to less than significant.

The General Plan EIR identifies a significant and unavoidable impact of a permanent increase in ambient noise levels, particularly traffic noise, due to development consistent with the 2030 General Plan. Despite the comprehensive noise policies proposed in the plan and mitigation efforts outlined in the Draft PEIR, it is infeasible to prevent existing sensitive areas from being exposed to future noise levels exceeding standards, contributing significantly to regional traffic noise.

Addendum Analysis

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

The Housing Element Update is a policy document consistent with the General Plan. The Housing Element Update includes housing sites located throughout the County that were evaluated previously for potential environmental impacts in the General Plan EIR. The Housing Element Update also includes ADUs, and projects that are approved or pending that have already undergone environmental analysis, if required. The project aims to help the County achieve the General Plan's vision, meet the necessary housing demands, and fulfill its RHNA for the 6th Cycle Housing Element.

Goals and policies in the 2030 General Plan that were referenced in the General Plan EIR, such as Policies HS-7.2 through HS-7.13, would reduce impacts to the furthest extent possible. Furthermore, Mitigation Measures NSE-4a, NSE-4b, and NSE-5a through NSE 5f, which were adopted along with the General Plan EIR, would supplement the General Plan goals and policies to reduce impacts to the furthest extent possible. These mitigation measures recommend the addition of Policy HS-7.14 and Program HS-L which would reduce transportation noise impacts and additional protection against adverse levels of vibration arising from the development of urban uses and infrastructure identified in the 2030 General Plan. These goals, policies, and measures would continue to be required with implementation of the proposed project.

Potential noise impacts for projects requiring discretionary approval cannot be assessed in a meaningful way until a project specific analysis, if required, is done covering the size of the development which includes construction noise, project operational noise and traffic-related noise. The Housing Element Update, in and of itself, does not include a specific project involving a new housing development, but puts forth goals and policies that support housing efforts in Merced County consistent with the overall vision of the General Plan. Because it is a policy document, the Housing Element Update would not, in and of itself, result in noise-related impacts. All future development consistent with the Housing Element Update would be required to comply with all relevant policies and guidelines regarding noise including policies and actions from the Merced County General Plan.

Conclusion

The adoption of the Housing Element Update does not involve changes to the current adopted land uses. 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

The General Plan EIR determined that implementation of the 2030 General Plan would potentially result in significant impacts related to population and housing. Implementation of the 2030 General Plan would induce population growth substantially because proposed policies could result in induced growth from new communities, expansion of existing Urban Area boundaries, and in rural areas. Mitigation Measures POP-1a through POP-1c, which recommend an amendment to Policy LU-5.F.1, prohibiting the expansion of existing Rural Residential Centers or the creation of new Centers, and limiting future residential development within agricultural areas of Merced County. Implementation of these mitigation measures along with the relevant General Plan policies, such as Policies ED-1.5, ED-1.8, ED-1.9, LU-1.1, LU-1.7, LU-1.9, LU-1.10, LU-3.4, LU-5.A.6, LU-7.1 through LU-7.4, LU-7.12, HE-1.6, HE-1.8, HE-1.10, and HE-1.11, would avoid or substantially reduce the secondary environmental effects of new community development, the expansion of existing Urban Communities, and rural development induced by implementation of the 2030 General Plan by limiting the opportunities for these actions. Impacts would be less than significant with mitigation. Although implementation of the proposed 2030 General Plan could lead to urban development that could displace people and existing housing units, necessitating the construction of replacement elsewhere, the proposed 2030 General Plan would allow for a net increase of housing, and contains goals and policies, such as Policies LU-5.A, LU-7.7, HE-4.1 through HE-4.14, HE-5.1, HE-5.2, HE-5.7, and HE-5.8, to preserve existing neighborhoods and housing. Thus, this impact would be less than significant. Additionally, when viewed with the more substantial growth projected to occur in the cities and the surrounding counties, the 2030 General Plan's incremental effects on growth and population would not make a cumulatively considerable contribution to this cumulative effect.

Addendum Analysis

The 4,222 units that would be accommodated by the Housing Element Update (opportunity and rezone sites) are within the future growth estimated in the General Plan and analyzed in the General Plan EIR. The Housing Element Update would be consistent with Housing Element law to plan adequately to meet

existing and projected housing needs for all economic segments of the community and is part of the process of planning for growth, and thus would not constitute substantial unplanned population growth.

The Housing Element Update is a policy document consistent with the General Plan. The Housing Element Update includes housing sites located throughout the County that were evaluated previously for potential environmental impacts in the General Plan EIR. The Housing Element Update itself is part of the process of planning for future growth, and the Housing Element and Sites Inventory have been designed to meet the County's share of the RHNA.

Goals and policies in the 2030 General Plan that were referenced in the General Plan EIR, such as Policies ED-1.5, ED-1.8, ED-1.9, LU-1.1, LU-1.7, LU-1.9, LU-1.10, LU-3.4, LU-5.A, LU-5.A.6, LU-7.1 through LU-7.4, LU-7.7, LU-7.12, HE-1.6, HE-1.8, HE-1.10, HE-1.11, HE-4.1 through HE-4.14, HE-5.1, HE-5.2, HE-5.7, and HE-5.8, would reduce impacts to the furthest extent possible. Furthermore, Mitigation Measures POP-1a through POP-1c, which were adopted along with the General Plan EIR, would supplement the General Plan goals and policies to reduce impacts to the furthest extent possible. These mitigation measures recommend amendments to General Plan Policies, which would result in prohibiting the expansion of existing Rural Residential Centers or the creation of new Centers, and limiting future residential development within agricultural areas of Merced County. These goals, policies, and measures would continue to be required with implementation of the proposed project.

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

Conclusion

The adoption of the Housing Element Update does not involve changes to the current adopted land uses. 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

The General Plan EIR states growth resulting from the 2030 General Plan would create demand for new public services in the county. The 2030 General Plan includes Policies PFS-1.1 through PFS-1.5, PFS-1.7 through PFS-1.9, PFS-6.2, PFS-6.4, PFS-6.5, PFS-7.2, PFS-7.5 through PFS-7.8, PFS-8.1, PFS-8.4 through PFS-8.9, LU-1.4, LU-1.7, LU-1.11, LU-5.B.6, to ensure that sufficient facilities and services are provided to serve additional growth. These policies and programs apply to any level of development, and therefore would mitigate the 2030 General Plan's increased demand for public services. For this reason, impacts to fire protection, police protection, school facilities, and library facilities would be less than significant. Additionally, implementation of the 2030 General Plan would not make a cumulatively considerable contribution to this less-than-significant cumulative effect.

Addendum Analysis

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

The Housing Element Update is a policy document consistent with the General Plan. The Housing Element Update site inventory includes housing sites located throughout the County that were evaluated previously for potential environmental impacts in the General Plan EIR. The Housing Element Update site inventory also accounts for anticipated ADU construction, and projects that are approved or pending that have already undergone environmental analysis, if required. The proposed increase in growth can be considered as anticipated growth as evident by accommodating the County's RHNA obligations. The proposed project would update the Housing Element of the General Plan and thus the fundamental regulations and requirements of the General Plan and Zoning Code, such as meeting design standards, would still apply. Goals and policies in the 2030 General Plan that were referenced in the General Plan EIR, such as Policies PFS-1.1 through PFS-1.5, PFS-1.7 through PFS-1.9, PFS-6.2, PFS-6.4, PFS-6.5, PFS-7.2, PFS-7.5 through PFS-7.8, PFS-8.1, PFS-8.4 through PFS-8.9, LU-1.4, LU-1.7, LU-1.11, LU-5.B.6, would reduce impacts to the furthest extent possible. These goals, policies, and measures would continue to be required with implementation of the proposed project.

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

Conclusion

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

6.16 Recreation

General Plan EIR Findings

The General Plan EIR states that several park and recreation services in the region, including counties, cities, and special districts. An increase in population within the county may increase demand for parks and recreation facilities and services. However, the 2030 General Plan includes goals and policies, such as LU-1.10, LU-7.2, LU-7.6, NR-4.1, CIR-1.7, CIR-4.1 through CIR-4.12, and RCR-1.1 through RCR-1.14, that are intended to reduce impacts associated with the construction and expansion of recreational facilities, making any impacts associated with the need to construct new facilities less than significant. For this reason, impacts to parks and recreation would be less than significant.

Addendum Analysis

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

The Housing Element Update is a policy document consistent with the General Plan. The Housing Element Update includes housing sites located throughout the County that were evaluated previously for potential environmental impacts in the General Plan EIR. The Housing Element Update also includes ADUs, and projects that are approved or pending that have already undergone environmental analysis, if required. The proposed project is intended to assist the County in achieving the vision of the existing General Plan and provide the necessary housing units to accommodate the anticipated growth and assist the County in meeting its RHNA for their 6th Cycle Housing Element.

Additionally, goals and policies in the 2030 General Plan that were referenced in the General Plan EIR, such as Policies LU-1.10, LU-7.2, LU-7.6, NR-4.1, CIR-1.7, CIR-4.1 through CIR-4.12, and RCR-1.1 through RCR-1.14, would reduce impacts to the furthest extent possible. These goals, policies, and measures would continue to be required with implementation of the proposed project.

Future development facilitated by the Housing Element Update would undergo project-specific developmental review, including design review, and would be subject to adopted development regulations. The proposed project would implement the 2030 General Plan, thereby resulting in the same recreation impacts from new development as evaluated in the certified EIR.

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

Conclusion

The adoption of the Housing Element Update does not involve changes to the current adopted land uses. 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

The General Plan EIR determined that transportation impacts related to conformance with applicable plans, ordinances, or policies establishing measures of effectiveness for county roads and State Highways would be potentially significant and subsequently incorporated mitigation measures TRF-1a through TRF-1e, TRF-2a through TRF-2d, and Policies LU-1.1, LU-1.10, LU-1.11, LU-2.5, LU-3.2, LU-4.4, LU-5.A.5, LU-5.D.4, LU-5.F.1 through LU-5.F.3, CIR-1.1 through CIR-1.12, CIR-1.15, CIR-1.19 through CIR-

1.22, CIR-3.7, CIR-3.9, CIR-3.10, and AQ-1.11. However, even with implementation of the mitigation measures and policies impacts would remain significant and unavoidable.

The General Plan EIR determined that buildout of the 2030 General Plan would have a less than significant impact in relation to conflicting with an applicable congestion management program, including but not limited to level of service (LOS) and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways.

The General Plan EIR determined mitigation measures TRF-6a and TRF-6b would mitigate impacts related to hazards due to design features to a less than significant impact.

Senate Bill 743 (SB 743) was passed in 2013, which required that by July 1, 2020, a project's transportation projects must be evaluated based on a Vehicle Miles Traveled (VMT) measure, instead of evaluating impacts based on LOS criteria. In January 2019, the Natural Resources Agency finalized updates to the CEQA Guidelines including the incorporation of the SB 743 modifications. The Guidelines changes were approved by the Office of Administrative Law and are now in effect. Therefore, as of July 1, 2020, LOS can no longer be the basis for determining an environmental effect under CEQA, and the analysis of impacts to transportation is now based on VMT. As this threshold of significance addressing VMT was not in place at the time the General Plan EIR was certified, this threshold was not evaluated as part of the General Plan EIR.

However, the VMT discussion was utilized in the calculation of air quality and GHG emissions only and was not addressed in the context of transportation-related impacts. Although the General Plan EIR did not draw a conclusion under the topic of VMT as it relates to transportation, the General Plan EIR did conclude that with increased energy efficiency as a result of the General Plan policies there would be a reduction in overall VMT in the unincorporated areas of the county. In addition, the General Plan identified Policy ED-1.5 which would aid in minimizing growth-inducing impacts related to population and employment growth by directing infrastructure investments to infill areas and other areas that have the greatest potential for economic development but would also require the least new infrastructure by encouraging developed uses to be grouped, complementary, and located near existing public services and infrastructure. Therefore, resulting in a general reduction of VMT with the placement of high density residential in existing urban areas in close proximity to services.

Addendum Analysis

The Housing Element Update aims to help the County achieve the General Plan's vision, meet the necessary housing demands, and fulfill its share of the RHNA for the 6th Cycle Housing Element. No specific developments are being approved as part of the project, nor would adoption of the project directly result in any changes in planned land uses or in the modification of policies and programs. Therefore, the project would not directly or indirectly result in transportation impacts. Future development facilitated by the project would undergo project-specific developmental review, including transportation analyses, and would be subject to adopted policies and programs identified in the General Plan EIR.

Buildout associated with Housing Element Update would fall within the previously analyzed General Plan's projected capacity, aligning with anticipated growth that was analyzed as part of the General Plan EIR.

As mentioned above, SB 743 mandates the use of VMT as the preferred metric for evaluating the transportation impacts of projects subject to CEQA review. The emphasis of analyzing VMT instead of LOS is to promote sustainable transportation and land use patterns by prioritizing projects that reduce overall vehicle travel and encourage alternative modes of transportation such as walking, biking, and

public transit. Consequently, reducing GHG emissions, air pollution, and reliance on single-occupancy vehicles.

The project itself would not result in any changes to the amount of VMT or the number of employees and residents generated by the Housing Element Update as the project itself does not propose or authorize any development beyond areas that have been identified by the 2030 General Plan. Individual projects under the Housing Element Update would be required to comply with performance standards that would limit new traffic impacts. Compliance with these requirements would ensure that future development approved pursuant to the Housing Element Update would not generate VMT beyond the capacity of the community in which they are established. The Housing Element Update project would aid in providing development that is within access to existing jobs and services. In addition, the proposed project would not result in increased density or more development than was envisioned in the 2030 General Plan. Therefore, the Housing Element Update would not result in increased transportation impacts from VMT.

In relation to hazards due to geometric design features, The project does not involve any roadway improvements that could result in hazards that could affect circulation. Vehicular traffic would utilize the existing network of regional and local roadways that serve developments that could result from the projects. The General Plan Transportation and Circulation Element includes policies that would ensure efficient circulation and adequate access are provided in the County, reducing cross-traffic conflicts. Future development, as part of the County's project approval process, would be required to comply with existing regulations, including General Plan policies and zoning regulations that have been prepared to minimize impacts related to design features, including the following:

- Policy CIR-1.2: Efficient Transportation Network (RDR)** Encourage land use patterns that promote shorter travel distances between residences and employment centers within Merced County, allow for non-auto travel, plan for multi-modal access for communities near I-5 and other major roadways, provide traffic calming on local roadways, and promote the efficient expansion and maintenance of transportation-related infrastructure to avoid constructing new roadways that would cause the physical division of existing communities.
- Policy CIR-1.4: Traffic Studies (RDR/PSR)** Require a traffic study to be prepared for all specific and community plans that includes, at a minimum:
 - a. Assessment of internal circulation system needs and design of a primary traffic circulation network for the plan area;
 - b. Demonstrate consistency with the circulation policies of the General Plan;
 - c. Identify regional transportation infrastructure connectivity requirements; and
 - d. Identify specific traffic impacts related to the plan area and improvement measures to mitigate those impacts including the identification of proportionate impact levels for regional governments.
- Policy CIR-1.9: Roadway Maintenance and Improvement (RDR)** Require that roadways are maintained and improved consistent with established peak period level of service.
- Policy CIR-1.10: Road System Coordination (IGC)** Cooperate with the cities within the County, adjacent counties, and State and Federal transportation agencies to coordinate the countywide roadway system, including right-of-way dedication and roadway improvements.

Policy CIR-1.21: Agricultural Operations (RDR) Require adequate right-of-way to accommodate increases in vehicular traffic on rural roads that serve agricultural tourism, value-added agriculture, and/or other unique agriculture-related land uses and pursue improvements as funding and resources allow.

Therefore, the project would not increase hazards due to geometric design features or incompatible uses. A less than significant impact would occur.

Regarding emergency access, the project would not result in inadequate emergency services. The County, throughout the buildout period of the project, would ensure relevant coordination with local emergency response providers, particularly during construction periods where temporary road closures may be expected. The project would also comply with the following relevant policies within the General Plan regarding response times and emergency access.

The Health and Safety Element contains the following policies related to emergency access within the County:

- Policy HS-3.7: Road Fire Buffers (RDR)** Encourage fire buffers along heavily traveled roads within high and extreme hazard zones by thinning, disking, or controlled burning. Plan parks, golf courses, utility corridors, roads, and open space areas so they can serve a secondary function as a fuel break.
- Policy HS-3.8: Cluster Development (RDR)** Encourage cluster developments in areas identified as subject to high or extreme fire hazard in order to provide for more localized and effective fire protection measures, such as consolidations of fuel build-up abatement, firebreak maintenance, firefighting equipment access, and water service provision.
- Policy HS-3.11: Emergency Equipment Access – Existing Development (RDR)** Encourage the construction of safe all-weather access for fire and emergency equipment to serve existing residential uses in areas designated as having a very high fire hazard severity.

Adherence to State and County requirements, combined by compliance with the County's General Plan polices and zoning regulations, would ensure that the adoption of the project would result in less-than-significant impacts with regards to inadequate emergency access. Therefore, the proposed project would implement the 2030 General Plan, thereby resulting in similar impacts to transportation as evaluated in the General Plan EIR.

Conclusion

The adoption of the Housing Element Update would not result in transportation 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 project and no additional environmental assessment of transportation is required.

6.18 Tribal Cultural Resources

General Plan EIR Findings

The General Plan EIR does not analyze tribal cultural resources pursuant to AB 52 (passed in 2015) as the 2030 General Plan was initiated in 2012, prior to the enactment of AB 52. However, as a condition of

Mitigation Measure CUL-3 in Section 6.5, *Cultural Resources*, in the General Plan EIR ensures that the 2030 General Plan proposed development activities are required to contact and consult Native American tribes. Cumulative impacts would also be less than significant.

Addendum Analysis

The General Plan goals and policies support reduction of impacts to tribal and cultural resources. Policies and actions in the General Plan included as mitigation in the General Plan EIR are implemented to help reduce impacts to the greatest extent possible. These policies and actions would be required with implementation of the Housing Element Update. The project aims to help the County achieve the General Plan's vision, meet the necessary housing demands, and fulfill its RHNA for the 6th Cycle Housing Element.

The proposed project would update the General Plan's Housing Element thus the fundamental regulations and requirements of the General Plan and Zoning Code, such as meeting design standards, would still apply. Mitigation Measure CUL-3, which was adopted along with the General Plan EIR, would reduce impacts to the furthest extent possible. This mitigation measure ensures that the 2030 General Plan proposed development activities are required to contact and consult Native American tribes. This mitigation measure would continue to be required with implementation of the proposed project.

The Housing Element Update, in and of itself, does not include a specific project involving a new housing development, but puts forth goals and policies that support housing efforts in Merced County consistent with the overall vision of the General Plan. Because it is a policy document, the Housing Element Update would not, in and of itself, result in impacts to tribal cultural resources.

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

Conclusion

The adoption of the Housing Element Update does not involve changes to the current adopted land uses. 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

Existing water supplies that serve agricultural, municipal, and industrial uses may be inadequate to accommodate future water demands within Merced County under the 2030 General Plan proposed buildout. Implementation of the proposed 2030 General Plan in Merced County is expected to increase potable water demand for urban uses, potentially requiring up to an additional 92,000 acre feet per year, exacerbating existing strain on water supply sources, particularly during drought conditions, and leading to declining groundwater levels in various parts of the county. Mitigation Measures USS-1a through USS-1c recommend amendments to General Plan policies that would increase water conservation and reduce future water demand arising from development of urban uses and infrastructure identified in the 2030 General Plan. While the 2030 General Plan contains these

mitigation measures along with policies promoting water efficiency for agricultural and urban uses, such as Policy LU-5.A.2, LU-5.D.6, LU-5.F.3, LU-5.F.4, LU-6.6, PFS-1.5, PFS-1.7, PFS-2.9, W-1.1 through W-1.4, W-1.6, W-1.7, W-1.10, W-3.1 through W-3.15, and W-5.1 through W-5.3, no additional feasible mitigation measures beyond supporting existing programs are available to reduce this impact. Thus, impacts to water supply would be significant and unavoidable.

The implementation of the 2030 General Plan would adhere to wastewater treatment requirements without necessitating the construction or expansion of new water or wastewater facilities. This is possible due to relevant General Plan goals and policies, such as Policy LU-5.A.2, LU-5.D.6, LU-5.F.3, PFS-1.5, PFS-2.1 through PFS-2.3, and PFS-2.8, which would improve water and wastewater treatment, collection, delivery, and disposal infrastructure in the county. Thus, impacts to wastewater treatment and facilities would be less than significant.

Implementation of the 2030 General Plan would have a minimal impact on solid waste disposal facilities as the two active landfills in the County, the Highway 59 Disposal site and Billy Wright Landfill, have adequate capacity through the year 2050 to accommodate planned growth and both facilities are operating within their regulatory requirements. The following General Plan policies would also reduce this impact: PFS-4.4 through PFS-4.7. Thus, impacts to solid waste disposal facilities would be less than significant.

Due to the uncertainty of future water management efforts to be conducted by different agencies, insufficient future surface water and groundwater supplies may be experienced in portions of the county and the region. No measures in addition to proposed 2030 General Plan policies and mitigation identified in this Draft PEIR are available and within the jurisdiction of Merced County to reduce the magnitude of this impact. Thus, the 2030 General Plan would make a cumulatively considerable contribution to this significant cumulative effect.

Addendum Analysis

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

The Housing Element Update is a policy document consistent with the General Plan. The Housing Element Update includes housing sites located throughout the County that were evaluated previously for potential environmental impacts in the General Plan EIR. The proposed increase in growth can be considered as anticipated growth as evident by accommodating the County's State RHNA goal. The proposed project would update the General Plan Housing Element thus the fundamental regulations and requirements of the General Plan and Zoning Code, such as meeting design standards, would still apply. Goals and policies in the 2030 General Plan that were referenced in the General Plan EIR, such as Policies LU-5.A.2, LU-5.D.6, LU-5.F.3, LU-5.F.4, LU-6.6, PFS-1.5, PFS-1.7, PFS-2.1 through PFS-2.3, PFS-2.8, PFS-2.9, PFS-4.4 through PFS-4.7, W-1.1 through W-1.4, W-1.6, W-1.7, W-1.10, W-3.1 through W-3.15, and W-5.1 through W-5.3, would reduce impacts to the furthest extent possible. Furthermore, Mitigation Measures USS-1a through USS-1c, which were adopted along with the General Plan EIR, would supplement the General Plan goals and policies to reduce impacts to the furthest extent possible. These mitigation measures recommend amendments to General Plan policies that would increase water conservation and reduce future water demand arising from development of urban uses and infrastructure identified in the 2030 General Plan. These goals, policies, and measures would continue to be required with implementation of the proposed project.

The Housing Element Update, in and of itself, does not include a specific project involving a new housing development, but puts forth goals and policies that support housing efforts in Merced County consistent with the overall vision of the General Plan. Because it is a policy document, the Housing Element Update would not, in and of itself, result in impacts to utilities and service systems. All future development consistent with the Housing Element Update would be subject to adopted development guidelines and other regulatory requirements concerning water, wastewater, storm drains, solid waste, and other infrastructure; water supply; and wastewater treatment systems including policies and actions from the County of Merced General Plan.

Conclusion

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

6.20 Wildfire

General Plan EIR Findings

The General Plan EIR did not analyze wildfire in a standalone section. Instead, wildfire was addressed in the Hazards and Hazardous Materials section. The General Plan EIR determined that implementation of the 2030 General Plan would lead to urban development and other activities which would increase the need for expanded fire protection services. Subsequently the 2030 General Plan contains specific goals and policies designed to prevent wildfire hazards related to wildland fuel reduction, emergency response, and design solutions. The Goals and Policies are as follows; Goal HS-3, Policies HS-3.1 through HS-3.13. The General Plan EIR concluded with implementation of the Goals and Policies, and in combination with federal and state regulations would result in a beneficial impact and would reduce wildfire risk and hazard impacts to a less than significant level.

Addendum Analysis

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

The Housing Element Update is a policy document consistent with the General Plan. The Housing Element Update includes housing sites located throughout the County that were evaluated previously for potential environmental impacts in the General Plan EIR. The Housing Element Update includes housing sites located throughout the County that were evaluated previously for potential environmental impacts in the General Plan EIR.

The project aims to help the County achieve the General Plan's vision, meet the necessary housing demands, and fulfill its RHNA for the 6th Cycle Housing Element. The Housing Element Update, in and of itself, does not include a specific project involving a new housing development, but puts forth goals and policies that support housing efforts in Merced County consistent with the overall vision of the General Plan. Because it is a policy document, the Housing Element Update would not, in and of itself, result in

impacts to wildfire. All future development consistent with the Housing Element Update would be required to comply with applicable regulations and requirements related to wildfire.

Conclusion

The adoption of the Housing Element Update does not involve changes to the current adopted land uses. 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 Cumulative Impacts

CEQA defines “cumulative impacts” as two or more individual impacts that, when considered together, are substantial or will compound other environmental impacts. Cumulative impacts are the combined changes in the environment that result from the incremental impact of development of the proposed project and other nearby projects. For example, noise impacts of two nearby projects may be less than significant when analyzed separately but could have a significant impact when analyzed together. Cumulative impact analysis provides a reasonable forecast of future environmental conditions and can more accurately gauge the effects of a series of projects.

This analysis is cumulative in nature in that it analyzes future development under the proposed Housing Element Update throughout unincorporated Merced County and takes into consideration the effects associated with the potential development of multiple projects in the housing element cycle through 2032. For analyses that may have more localized or neighborhood implications (aesthetics, agriculture, biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, public services, recreation, utilities, tribal cultural resources, wildfire), the geographic scope for cumulative impacts includes the unincorporated county. For these issue areas, generally, impacts are site specific and cumulative impacts would not be significant. Therefore, the proposed project would not result in a cumulatively considerable contribution to the above-mentioned issue areas. Future development projects would be reviewed by the County pursuant to CEQA to identify potential impacts on a project-by-project basis. While there is the potential for significant cumulative impacts, it is anticipated that potential impacts associated with individual development projects would be addressed on a case-by-case basis and would be subject to the mitigation measures outlined in this Addendum, the General Plan and zoning ordinance, and State and local regulations regarding the protection of such resources. With compliance with the existing policies and regulations, future development would be required to avoid or mitigate impacts. Therefore, the proposed project’s incremental contribution to cumulative impacts associated with aesthetics, agriculture, biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, public services, recreation, utilities, tribal cultural resources, and wildfire would not be cumulatively considerable, and cumulative impacts would be less than significant.

Some analyses including air quality, energy, greenhouse gas emissions, transportation, and population and housing, rely on much larger geographic areas such as the entire Merced County region. However, the proposed Housing Element Update would be within the buildout analyzed in the General Plan EIR, which included an analysis of cumulative impacts. As discussed in the impact analyses above, future development would be required to comply with mitigation measures outlined in this Addendum, General Plan and zoning ordinance, and State and local regulations regarding the protection of such resources, and therefore would not result in a cumulatively considerable contribution to air quality, energy, greenhouse gas emissions, transportation, and population and housing.

Therefore, with continued implementation of mitigation measures from the General Plan EIR, impacts of the proposed Housing Element Update would not be cumulatively considerable. Impacts would be generally the same as the impact analyzed in the General Plan EIR for the County’s General Plan. Because there would be no new or substantially more severe significant impacts than what was analyzed in the General Plan EIR, further analysis is not warranted.

8 Conclusion

Merced County, acting as the lead agency, has determined that an addendum to the General Plan EIR 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 meet the standards 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 or anticipated as evident by the County's share of the RHNA. 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.

9 References

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9.2 List of Preparers

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

RINCON CONSULTANTS, INC.

Matt Maddox, AICP, Principal
 Eric VonBerg, MRP, Supervising Planner, Project Manager
 Nina Bellucci, Senior Planner
 Kay Real, Planner

Merced County Housing Element Update Project

Gianna Meschi, Environmental Planner

Katherine Fikan, Environmental Planner

Lillie Colville, Environmental Planner

Michael Huang, Environmental Planner

Rachel Irvine, Environmental Planner

Mabel Chan, Environmental Planner

Kayleigh Limbach, Environmental Planner

Courtney Montgomery, MA, Archaeologist

Gina Gerlich, GIS Specialist

Katherine Castanon, GIS Specialist

Luis Apolinar, Publishing Specialist

Yaritza Ramirez, Publishing Specialist