

Notice of Exemption

Appendix E

To: Office of Planning and Research
P.O. Box 3044, Room 113
Sacramento, CA 95812-3044

From: (Public Agency): San Benito County RMA Planning Dept.
2301 Technology Parkway, Hollister CA, 95023

County Clerk

County of: San Benito

(Address)

1601 Luna Way, Hollister CA, 95023-2513

Project Title: County of San Benito 2023-2031 Housing Element

Project Applicant: County of San Benito

Project Location - Specific:

Countywide

Project Location - City: N/A Project Location - County: Unincorporated San Benito County

Description of Nature, Purpose and Beneficiaries of Project:

The Project is the County of San Benito Housing Element 2023 – 2031, which represents the County's policy program for the 2023-2031 6th Cycle Planning Period. The Project involves adoption of the Housing Element Update, amending the General Plan to update the Housing Element for the current cycle, and certification of the CEQA document (i.e., Notice of Exemption).

Name of Public Agency Approving Project: County of San Benito

Name of Person or Agency Carrying Out Project: County of San Benito

Exempt Status: **(check one):**

- Ministerial (Sec. 21080(b)(1); 15268);
- Declared Emergency (Sec. 21080(b)(3); 15269(a));
- Emergency Project (Sec. 21080(b)(4); 15269(b)(c));
- Categorical Exemption. State type and section number: §15061(b)(3), §15262, §15283
- Statutory Exemptions. State code number: _____

Reasons why project is exempt:

State CEQA Guidelines §15061(b)(3) Common Sense Exemption, State CEQA Guidelines §15262, State CEQA Guidelines §15283. The Project is exempt under the Common Sense Exemption because it can be seen with certainty that there is no possibility that the 2023-2031 Housing Element programs and policies would have a significant effect on the environment. Neither the Project nor the 2023-2031 Housing Element's programs and policies would result in physical environmental impacts or direct housing construction. Additionally, the 2023-2031 Housing Element does not grant any development entitlements or authorize development beyond what is allowed under the County's current General Plan and Zoning Code (Title 25).

Lead Agency

Contact Person: Stephanie Reck Area Code/Telephone/Extension: (831) 718-7960

If filed by applicant:

1. Attach certified document of exemption finding.
2. Has a Notice of Exemption been filed by the public agency approving the project? Yes No

Signature: *Stephanie Reck* Date: 6/23/2025 Title: Senior Planner

▪ Signed by Lead Agency Signed by Applicant

Authority cited: Sections 21083 and 21110, Public Resources Code.
Reference: Sections 21108, 21152, and 21152.1, Public Resources Code.

Date Received for filing at OPR: _____



TECHNICAL MEMORANDUM

To: Abraham Prado, Director of Planning, Building & Code Enforcement
From: Bryant de la Torre, Project Manager, Kimley-Horn and Associates
Date: April 3, 2025
Subject: County of San Benito 2023-2031 Housing Element CEQA Determination

INTRODUCTION

This Technical Memorandum evaluates the County of San Benito 2023-2031 Housing Element (“the Project”) concerning California Environmental Quality Act (CEQA) compliance. This Technical Memorandum was prepared to present: 1) the findings of the CEQA compliance review, as described below; and 2) the recommendations concerning the appropriate CEQA compliance documentation.

STATUTORY AUTHORITY AND REQUIREMENTS

State CEQA Guidelines Section 15061 – Review for Exemption

Once it has been determined that an activity is a project subject to CEQA, it is then determined whether the project is exempt from CEQA. Pursuant to State CEQA Guidelines Section 15061, a project is exempt from CEQA if:

- 1) The project is exempt by statute (see State CEQA Guidelines Article 18, commencing with §15260).
- 2) The project is exempt pursuant to a Categorical Exemption (CE) (see State CEQA Guidelines Article 19, commencing with §15300) and the application of that CE is not barred by one of the exceptions set forth in State CEQA Guidelines Section 15300.2.
- 3) The activity is covered by the common sense exemption that CEQA applies only to projects which have the potential for causing a significant effect on the environment. Where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment, the activity is not subject to CEQA.
- 4) The project will be rejected or disapproved by a public agency.
- 5) The project is exempt pursuant to the provisions of Article 12.5 - Exemptions for Agricultural Housing, Affordable Housing, and Residential Infill Projects.

The proposed project would be exempt as a “common sense” exemption under Guidelines Section 15061(b)(3) because the 2023-2031 Housing Element would not have the potential to cause a significant effect on the environment.

State CEQA Guidelines Section 15262 – Feasibility and Planning Studies

Pursuant to State CEQA Guidelines Section 15262, a project involving only feasibility or planning studies for possible future actions which the agency board or commission has not approved, adopted, or funded

does not require the preparation of an EIR or Negative Declaration but does require consideration of environmental factors is exempt from CEQA.

The proposed project would be exempt as under State CEQA Guidelines Section 15262 because it is a feasibility or planning study for possible future actions by the County.

State CEQA Guidelines Section 15283 – Housing Needs Allocation

Pursuant to State CEQA Guidelines Section 15283, CEQA does not apply to regional housing needs determinations made by the Department of Housing and Community Development, a council of governments, or a city or county pursuant to Government Code Section 65584.

The proposed project would be exempt as under State CEQA Guidelines Section 15283 because it is an action to implement a regional housing needs determination.

PROJECT DESCRIPTION

The Housing Element is a state mandated chapter of the County of San Benito General Plan that establishes the County of San Benito's ("County") official housing policies and programs to accommodate the Regional Housing Needs Allocation (RHNA) goals, as determined by the Council of San Benito County Governments (SBCOG). The Housing Element identifies and analyzes the County's housing needs and includes a detailed outline and work program of the County's goals, priorities, and quantified objectives to develop housing. The Housing Element also addresses the maintenance and expansion of the County's housing supply to accommodate households currently living and expected to live in unincorporated San Benito County in the housing cycle. For the 6th Cycle (2023-2031) planning period, SBCOG allocated 754 housing units to the County, apportioned by the following income categories: 246 units affordable to very low-income households; 198 units affordable to low-income households; 103 units affordable to moderate-income households; and 207 units affordable to above-moderate (market-rate) income households.

The proposed Housing Element represents the County's policy program for the 6th Cycle 2023-2031 planning period. The 2023-2031 Housing Element is a comprehensive review and update to the previous Housing Element, which covered the 5th Cycle 2015-2023 planning period. The proposed Housing Element is comprised of six Chapters and three Appendices (i.e., Introduction, Community Profile, Housing Constraints, Housing Resources, Affirmatively Furthering Fair Housing, Policy Plan, Review of Past Performance, Candidate Housing Sites Analysis, and Community Engagement).

The Policy Plan addresses the County's identified housing needs, including housing goals, policies, and programs and discusses the County's approach to addressing its share of the regional housing need. The Policy Plan includes a Candidate Housing Sites Analysis, which the County conducted to satisfy their RHNA. The identified housing sites represent the County's ability to accommodate housing at the designated income levels within the 2023-2031 planning period. These sites are either within a specific plan entitled for residential development, currently in the pipeline, projected ADU development, or identified for rezoning to accommodate the County's remaining need.

The County prepared a parcel-specific land inventory of the sites through various methods, including the following: identification of capacity on existing, residentially-zoned sites and specific plans; future development of accessory dwelling units (ADUs); projects currently in the pipeline; and identification of land for rezoning to accommodate remaining RHNA allocation. The County's potential development capacity totals 4,428 units on 21 sites throughout the County, which includes 2,077 units currently within

the planning process or entitled but not built (Pipeline Projects), 219 ADUs, and 2,044 units through a proposed rezoning of 12 sites.¹ The Policy Plan shows the County has the capacity to meet their 2023-2031 RHNA allocation through the above-identified methods, with a surplus of 3,674 units (487 percent surplus).² The Policy Plan shows projects currently within the planning process would entirely meet the County's moderate- and above moderate-income need. The combination of ADUs and projects currently within the planning process alone would not meet the County's lower income need, therefore, the County proposed rezoning (i.e., Residential High) to meet this need.

The 2023-2031 Housing Element's Policy Plan includes Goals, Policies, and Program Actions aimed at providing additional housing opportunities, removing governmental constraints to affordable housing, improving the condition of existing housing, and providing equal housing opportunities for all residents. The Project does not propose to implement or result in housing development. Additionally, the Project does not propose to implement any program action that could have a significant effect on the environment or that was not previously analyzed in a CEQA document. It is noted, *Housing Program 3-2: Residential High Rezone and General Plan Amendment* is a Housing Element action committing to completing rezones and a General Plan Amendment, but it is its own Project under CEQA and will be evaluated and considered separately.

FINDINGS CONCERNING CEQA COMPLIANCE/CEQA EXEMPTION

Kimley-Horn has completed the Project's CEQA compliance review, as discussed below.

Exemption Justification Under State CEQA Guidelines Section 15061(b)(3) "Common-Sense Exemption", State CEQA Guidelines Section 15262, and State CEQA Guidelines Section 15283.

The Project proposes to update the County's Housing Element and includes Policies and Program Actions to meet the County's 6th Cycle RHNA. **Attachment A: County of San Benito 2023-2031 Housing Element CEQA Review Matrix**, summarizes the 2023-2031 Housing Element Policies and Program Actions, compares these to the 2015-2023 Housing Element Policies and Program Actions, and provides summary findings concerning the potential for the proposed Policies and Program Actions to have a significant effect on the environment. As concluded in **Attachment A**, the proposed Policies and Program Actions either could not have a significant effect on the environment or will be analyzed as Projects are proposed.

As proposed, the 2023-2031 Housing Element would not result in any direct or indirect physical changes to the environment. All future proposed housing development projects submitted to the County will be reviewed pursuant to CEQA, when required, concurrent with other permitting and regulatory requirements. The 2023-2031 Housing Element is a policy document and does not provide entitlements to any specific land use projects. Any future policy changes and implementation of Housing Programs will be evaluated for CEQA compliance prior to adoption of any such changes or implementation. The 2023-2031 Housing Element does not make any changes to the General Plan land use map and does not modify any land use designations, or allowed densities or intensities currently established in the General Plan. The 2023-2031 Housing Element neither entitles, proposes, nor otherwise requires the construction of new development or rehabilitation of existing development, nor does it change the rate or location of new development. Future housing development pursuant to the 2023-2031 Housing Element would be subject to compliance with the established regulatory framework, namely federal, state, regional, and local laws, ordinances, and regulations, including the General Plan policies, Code of Ordinances standards,

¹ County of San Benito (2025). County of San Benito 6th Cycle Housing Element Table B-2: RHNA Summary Table. San Benito County, CA: County of San Benito.

² Ibid.

and Standard Conditions of Approval. While by-right housing projects may be exempt from CEQA, all future housing development pursuant to the 2023-2031 Housing Element would be subject to compliance with the established regulatory framework, which can include supporting technical reports.

As is evidenced by the analysis presented in **Attachment A**, and given the nature and scope of the proposed Project as discussed above, it can be seen with certainty that the proposed Project would not have a significant effect on the environment. As such, the Project qualifies as being exempt from CEQA under the common-sense exemption pursuant to **State CEQA Guidelines Section 15061(b)(3)**. Additionally, the Housing Element is exempt pursuant to **State CEQA Guidelines Section 15262** because it is a feasibility or planning study for possible future actions by the County and is exempt pursuant to **State CEQA Guidelines Section 15283** as an action to implement a regional housing needs determination. Therefore, it has been determined that a Notice of Exemption is the appropriate CEQA documentation.

Attachment A
San Benito 2023-2031 Housing Element Update CEQA Review Matrix

5 th Cycle Housing Element	6 th Cycle Housing Element	New	Modified/Ongoing	Summary of Determination the Policy/Program Action is Exempt Under State CEQA Guidelines §15061(b)(3) Common Sense Exemption
Goal 1: Expand housing choice opportunities for existing and future San Benito County residents.				
HOU-4-6	Program 1-1		X	<p>This Program Action addresses the County's effort to seek and encourage collaboration with affordable housing developers to expand the supply of lower-income units. This Program Action does not implement or result in direct housing development. Rather, this Program Action involves directing interested agencies/ sponsors to potential sites and collaborating with them on applications for State and federal funding. Therefore, this Program Action would not have a significant effect on the environment.</p>
-	Program 1-2	X		<p>This Program Action addresses the County's effort to build more affordable housing units. This Program Action only adjusts regulations to building requirements and affordability thresholds. Therefore, the Program Action would not have a significant effect on the environment.</p>
HOU-2-1	Program 1-3		X	<p>There are no significant Program changes between the 5th and 6th Cycle Housing Elements. Moreover, these policies do not guarantee housing developments, as new developments would still need to go through the normal approval process with the County. Therefore, these policies would not have a significant effect on the environment.</p>
-	Program 1-4	X		<p>This Program Action addresses the County's collaboration with Hollister and other providers to ensure future housing demand is coordinated with future capital planning infrastructure. This Program Action does not implement or result in direct housing development. Rather, the County will continue to collaborate with the County partners concerning infrastructure, including coordinating improvement projects for the County's potable water, electrical, storm drain and sewer infrastructure systems. Therefore, this Program Action would not have a significant effect on the environment.</p>

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-	Program 1-5	X		<p>This Program Action addresses Chapter 727, Statutes of 2005 (SB 1087), where jurisdictions are required to deliver adopted Housing Elements and any amendments to local water and sewer service providers. This Program Action allows for coordination between the County and water and sewer providers when considering approval of new residential projects. This Program Action is to comply with the requirements of State Law and does not implement or result in direct housing development. Therefore, this Program Action would not have a significant effect on the environment.</p>
-	Program 1-6	X		<p>This Program Action addresses the County's goal to encourage the development of varying housing types and sizes to meet the housing needs of the County's diverse population. This Program Action does not implement or result in direct housing development. Therefore, this Program Action would not have a significant effect on the environment.</p>
HOU-1-11	Program 1-7		X	<p>This Program Action addresses the County's goal to leverage and maximize funds to assist with affordable housing development in unincorporated County areas. This Program Action does not implement or result in direct housing development. Rather, this Program Action involves exploring the possibility of offering rehabilitation assistance for rental units and will continue to apply for grant funding annually for the continued operation of the program. Therefore, this Program Action would not have a significant effect on the environment.</p>
HOU-2-6	Program 1-8		X	<p>There are no significant Program changes between the 5th and 6th Cycle Housing Elements. Moreover, these policies do not implement or result in direct housing development. Therefore, this Program would not have a significant effect on the environment.</p>

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HOU-2-7	Program 1-9		X	<p>This Program Action addresses the County's need to develop a variety of housing types. The Program Action's goal is to facilitate the development of at least 219 ADUs, comply with State law governing the permitting of ADUs, and, if needed, revise regulations to achieve statutory compliance. This Program Action commits to amend requirements and facilitates development but does not guarantee permitting or development, as new developments would still need to go through the normal approval process with the County. Therefore, this Program Action would not have a significant effect on the environment.</p>
-	Program 1-10	X		<p>This Program Action addresses the need for more accessibility and affordability for housing in the County. This Program Action upholds the previous ADU Monitoring Program and creates a survey process to monitor any gaps between projected and actual ADU developments. This Program Action creates a program and survey and does not implement or result in direct housing development. Therefore, these policies would not have a significant effect on the environment.</p>
-	Program 1-11	X		<p>This Program Action addresses the County's need to comply with California Government Code Section 65913.4 and with the requirements of SB 35 (2017). This Program establishes streamlining procedures and objective standards for qualifying projects and allows them to be approved ministerially. As this Program is ministerial, it does not have any significant effect on the environment.</p>
-	Program 1-12	X		<p>This Program Action addresses the County's efforts to encourage and facilitate future redevelopment of nonvacant sites. This Program Action does not implement or result in direct housing development. Rather, this Program Action involves incentives such as allowing streamlined or by-right development application processing for infill projects proposing at least 10%</p>

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				affordable units; and/or reducing appropriate development standards for infill projects proposing at least 10% affordable units. This Program Action does not grant permits for redevelopment on nonvacant sites. Therefore, this Program Action would not have a significant effect on the environment.
	Program 1-13	X		This Program Action addresses the County's efforts to encourage residential development and maximize the development potential identified in the 6 th Cycles Sites Inventory. This Program Action promotes existing residential incentives and identify potential new incentives as appropriate. This Program Action does not grant permits for redevelopment on nonvacant sites. Therefore, this Program Action would not have a significant effect on the environment.
	Program 1-14	X		This Program Action addresses the County's efforts to encourage residential development and maximize the development potential of large parcels (greater than 10 acres) identified in the 6 th Cycles Sites Inventory. This Program Action promotes existing residential incentives and identify potential new incentives as appropriate. This Program Action does not grant permits for redevelopment on nonvacant sites. Therefore, this Program Action would not have a significant effect on the environment.
HOU-2-13	Program 1-15		X	There are no significant Program changes between the 5th and 6th Cycle Housing Elements. Moreover, these Programs do not implement or result in direct housing development. Therefore, these Programs would not have a significant effect on the environment.
HOU-2-14	Program 1-16		X	This Program Action addresses the County's operation of an affordable Housing and community investment Program, which provides financial assistance in the form of loans for the purchase, construction, and/or rehabilitation of affordable housing. This Program Action does not grant permits for

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-	Program 1-17	X		<p>redevelopment on nonvacant sites. Therefore, this Program Action would not have a significant effect on the environment</p> <p>This Program Action is in response to a 2023 housing characteristics survey on the County's workforce housing needs, which found that County employees fall within the low- to moderate-income categories. This Program Action develops a program and/or incentives that increase rental and homeownership opportunities for workforce members. As This Program Action does not implement or result in direct housing development, there would not be a significant effect on the environment.</p>
-	Program 1-18	X		<p>This Program Action addresses the County's desire to explore options to adopt an ordinance to allow 100% affordable projects by-right. This Program Action does not grant permits. Therefore, this Program Action would not have a significant effect on the environment.</p>
-	Program 1-19	X		<p>This Program Action addresses the County's efforts to encourage residential development and maximize the development potential of religious and institutional facilities in the County. This Program Action promotes SB 4 and AB 1851. This Program Action does not grant permits for redevelopment on nonvacant sites. Therefore, this Program Action would not have a significant effect on the environment.</p>
Goal 2: Expand housing opportunities for all economic segments of San Benito County's population.				
HOU-1-11	Program 2-1		X	<p>This Program Action addresses the County's operation of applying for Housing Rehabilitation assistance funds. This Program Action does not implement or result in direct housing development. Rather, this Program Action involves exploring the possibility of applying and receiving funds for rehabilitation. Therefore, this Program Action would not have a significant effect on the environment.</p>

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HOU-3-3	Program 2-2		X	This Program Action is an ongoing program from the 5 th cycle, which commits to continue code enforcement activities. The Code Enforcement Officer is tasked to review properties within the unincorporated area of the County for property maintenance and compliance issues. This Program Action does not result in the granting of permits or development. Therefore, this Program Action would not have a significant effect on the environment.
HOU-3-6	Program 2-3		X	There are no significant Program changes between the 5th and 6th Cycle Housing Elements. Moreover, these Programs do not implement or result in direct housing development. Therefore, these Programs would not have a significant effect on the environment.
HOU-3-4	Program 2-4		X	This Program Action is part of the County's attempts to help its community recover from financial, environmental, and housing hardships posed by the COVID-19 pandemic and severe flooding in 2023. This program discusses temporary trailer units and RVs for persons/families displaced as a result of these hardships. This Program focuses on maintaining and providing funding to these trainer units and RV's. This Program Action does not implement or result in direct housing development. Therefore, these policies would not have a significant effect on the environment.
-	Program 2-5	X		This Program Action addresses the County's efforts to adopt an updated Safety Element pursuant to Senate Bill (SB) 1035 (2018), which requires jurisdictions to review and, if necessary, update the Safety Element upon each revision of the housing element or Local Hazard Mitigation Plan. This Program Action does not directly adopt an updated Health and Safety Element, therefore this Program Action would not have a significant effect on the environment.
HOU-1-3	Program 2-6		X	This Program Action addresses the County's understanding and goal of reducing displacement of communities that may come

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Goal 3: Use public and private resources to maintain and enhance existing residential neighborhood character				
HOU-2-4	Program 3-1	X		This Program Action addresses the need to track and monitor the County's success of meeting the State's allocated RHNA numbers. This Program Action only monitors and keeps public records updated. Therefore, this Program Action has no significant effect on the environment.
-	Program 3-2	X		To accommodate the States RHNA allocation, this Program Action amends the County's General Plan Land Use (GPLU) Element to include a land use designation permitting increased residential density. The Program Action also commits to amending the County's Zoning Ordinance to establish a new zone to accommodate RHNA. The General Plan Amendment and Rezone program will require their own CEQA analysis, and all qualifying projects will still be subject to planning and building standard review. Therefore, this Program Action has no direct effect on the environment.
-	Program 3-3	X		This Program Action addresses the County's need to comply with State Law. The County will adopt a housing replacement program in compliance with State Law. This Program Action does not directly implement or result in direct housing development and therefore has no direct effect on the environment.
-	Program 3-4	X		This Program Action addresses the County's need to track the progress of pipeline projects in the entitlement process. If

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				<p>projects are not sufficiently progressing toward building permits as of midway through the 6th Cycle planning period, the County will evaluate its sites inventory and capacity to maintain adequate sites and adjust accordingly. This Program Action does not directly implement or result in direct housing development and therefore has no direct effect on the environment.</p>
<p>Goal 4: Provide housing opportunities for all San Benito County residents, regardless of race, color, ancestry, national origin, religion, age, gender, gender identity and expression, marital status, familial status, medical condition or disability, military or veteran status, source of income, sexual orientation, or any other protected characteristics.</p>				
-	Program 4-1	X		<p>This Program Action addresses the County's continued efforts to maintain and update any development standards that may constrain the development of affordable housing. In the event of any change in requirements, developments will still be subject to the standard CEQA, planning and building review process. Therefore, this Program Action has no significant effect on the environment.</p>
-	Program 4-2	X		<p>This Program Action addresses the County's obligation to comply with AB 2097. AB 2097 does not permit development, and the Program Action does not permit development. Therefore, this Program Action has no significant effect on the environment.</p>
-	Program 4-3	X		<p>Pursuant to government transparency laws contained in Government Code Section 65940.19(a)(1)(B), this Program Action will ensure all zoning, development standards, and fee schedules on the County's website. This Program Action does not implement or result in direct housing development. Therefore, this Program Action would not have a significant effect on the environment.</p>
-	Program 4-4	X		<p>This Program Action addresses the County's goal of facilitating and encouraging the development of a variety of housing types in the community. This Program Action ensures that the County monitors its development fees to ensure that are reasonable and</p>

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HOU-1-6	Program 4-5		X	<p>od not constrain housing development and will update as needed. Updating fees does not grant permits or guarantee development. Therefore, this Program Action would not have a significant effect on the environment.</p> <p>The Program Action amends the County's Zoning Ordinance to comply with the requirements of AB 139 and AB 2339. Chapter 654, Statutes of 2022 (AB 2339), to include new requirements on how jurisdictions must plan for emergency shelters and ensure sufficient capacity for low-income housing. This Program Action amends the Zoning Code to comply with provisions of AB 139 and 2339 but does not permit development. Therefore, this Program Action has no significant impact on the environment.</p>
HOU-2-12	Program 4-6		X	<p>This Program Action addresses the need for transitional and supportive housing to be permitted by-right in all residential zones, including non-residential zones permitting multifamily uses, as pursuant to Government Code Section 65651. This Program Action amends the Zoning Code to comply with statutory requirements for both transitional and supportive housing. Moreover, this Program Action establishes procedures to provide an expedited review for supportive housing pursuant to AB 2162. This Program Action amends Zoning Codes but does not permit development. Therefore, the Program Action has no direct impact on the environment.</p>
	Program 4-7	X		<p>Pursuant to Government Code Section 65660 this Program Action adopts and implements procedures and regulations to process low-barrier navigation centers. Procedures shall include establishing a ministerial approval process. This Program Action amends regulation but does not permit development. Therefore, the Program Action has no direct impact on the environment.</p>
HOU-2-16	Program 4-8	X		<p>The Program Action addresses Government Code Section 65583(c)(1)(C) and Section 65583(a)(6) requirement for</p>

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				<p>agricultural housing to be permitted by-right, without a conditional use permit (CUP), in single-family zones for six or fewer persons and in agricultural zones with no more than 12 units or 36 beds. The Program Action amends the County's Zoning Code to add employee housing for six or fewer employees in the permitted use tables. Additionally, this Program Action establishes a streamlined, ministerial approval process for eligible agricultural employee housing developments. The Program Action only amends requirements and streamlines the approval process but does not permit development. Therefore, this Program Action has no significant impact on the environment.</p>
-	Program 4-9	X		<p>This Program Action addresses the County's need for Residential/Community Care Facilities and Group Homes. This Program Action amends the County's Zoning Code to identify zones to permit residential care facilities and establish procedures and regulations. This Program Action amends requirements and streamlines the approval process but does not permit development. Therefore, this Program Action has no significant impact on the environment.</p>
-	Program 4-10	X		<p>This Program Action addresses the County's need to develop a variety of housing types. This Program Action amends the County's Zoning Code to define SROs, identify zones to permit SROs, and establish procedures and regulations. The Program Action amends requirements but does not permit development. Therefore, this Program Action has no significant impact on the environment.</p>
-	Program 4-11	X		<p>This Program Action addresses the County's need to develop a variety of housing types. This Program Action amends the County's Zoning Code to allow manufactured homes on a foundation on lots zoned for conventional single-family</p>

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Goal 5: Promote energy efficiency and conservation throughout San Benito County				
HOU-1-3	Program 5-1		X	There are no significant policy changes between the 5th and 6th Cycle Housing Elements. Moreover, these Programs do not implement or result in direct housing development. Therefore, these Programs would not have a significant effect on the environment.
HOU-1-7	Program 5-2		X	There are no significant policy changes between the 5th and 6th Cycle Housing Elements. Moreover, these Programs do not implement or result in direct housing development. Therefore, these Programs would not have a significant effect on the environment.
-	Program 5-3	X		This Program Action addresses the County's efforts to continue to implement its Reasonable Accommodation Ordinance, which provides persons with disabilities with a procedure to request reasonable accommodation to housing under the Federal Fair Housing Act and the California Fair Employment and Housing Act. This Program Action does not implement or result in direct housing development. Rather, this Program Action involves the review of conditions of approval for reasonable accommodation and subsequent revisions where appropriate to ensure compliance with fair housing laws. Therefore, this Program Action would not have a significant effect on the environment.
-	Program 5-4	X		This Program Action discusses the contract the County maintains with the California Rural Legal Assistance (CRLA) to help residents with fair housing complaints. This Program Action provides referrals to appropriate agencies for services, distribute fair housing information in public locations and post fair housing information on the County's website. This Program Action

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				provides County residents with information and legal help and does not implement or result in direct housing development. Therefore, these policies would not have a significant effect on the environment.
Hou-4-2	Program 5-5		X	This Program Action addresses the County's goal of offering accessible housing-related materials relating to activities, services, and programs in multiple languages. This Program Action do not implement or result in direct housing development. Therefore, these policies would not have a significant effect on the environment.
HOU-4-11	Program 5-6		X	There are no significant policy changes between the 5th and 6th Cycle Housing Elements. Moreover, these Programs do not implement or result in direct housing development. Therefore, these Programs would not have a significant effect on the environment.
HOU-2-18	Program 5-7		X	There are no significant policy changes between the 5th and 6th Cycle Housing Elements. Moreover, these Programs do not implement or result in direct housing development. Therefore, these Programs would not have a significant effect on the environment.
-	Program 5-8	X		This Program Action addresses the identified census tract (06069000702) with a population at risk of displacement. This Program Action establishes a program to prevent displacement and distribute that information widely with a focus on lower-income areas. This Program Action spreads information and educated County residents and does not implement or result in direct housing development. Therefore, these policies would not have a significant effect on the environment.
HOU-4-1	Program 5-9		X	There are no significant policy changes between the 5th and 6th Cycle Housing Elements. Moreover, these Programs do not implement or result in direct housing development. Therefore,

Attachment A
San Benito 2023-2031 Housing Element Update CEQA Review Matrix

5 th Cycle Housing Element	6 th Cycle Housing Element	New	Modified/Ongoing	Summary of Determination the Policy/Program Action is Exempt Under State CEQA Guidelines §15061(b)(3) Common Sense Exemption
				these Programs would not have a significant effect on the environment.
HOU-2-16	Program 5-10		X	This Program Action addresses the County's need in understanding and addressing farmworker housing needs. This Program Action Increases opportunities for farmworkers to achieve housing, education, and rehabilitation of current facilities. The Program Action these policies do not permit. Therefore, the Program Action would not have a significant effect on the environment.
Goal 6: Energy Efficiency and Conservation				
HOU-5-3	Program 6-1		X	There are no significant Program changes between the 5th and 6th Cycle Housing Elements. Moreover, these policies do not implement or result in direct housing development. Therefore, these policies would not have a significant effect on the environment.
HOU-5-2	Program 6-2		X	There are no significant Program changes between the 5th and 6th Cycle Housing Elements. Moreover, these policies do not implement or result in direct housing development. Therefore, these policies would not have a significant effect on the environment.