Findings of Consistency
Farmworker Housing Ordinance
CEQA Section 15183 Statutory Exemption
SCH No. 2003012020

Prepared by:
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I. Project Information

Project Title: Farmworker Housing Ordinance
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Applicant: County of Sonoma
Property Owner: County of Sonoma
Project location: Countywide
General Plan Designation: Land Extensive Agriculture, Land Intensive Agriculture, Diverse Agriculture, and Resource and Rural Development
Zoning Designation: Land Extensive Agriculture (LEA), Land Intensive Agriculture (LIA), Diverse Agriculture (DA), and Resource and Rural Development (RRD)

II. Introduction

1. Purpose of the 15183 finding of consistency

California Public Resources Code Section 21083.3 and California Environmental Quality Act (CEQA) Guidelines Section 15183 provide an exemption from additional environmental review for projects that are consistent with the development density established by existing zoning, community plan or general plan policies for which an Environmental Impact Report (EIR) was certified, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site. Section 15183 specifies that examination of environmental effects shall be limited to those effects that:

1) Are peculiar to the project or the parcel on which the project would be located, and were not analyzed as significant effects in a prior EIR on the zoning action, general plan, or community plan, with which the project is consistent,
2) Are potentially significant off-site impacts and cumulative impacts which were not discussed in the prior EIR prepared for the general plan, community plan or zoning action, or
3) Are previously identified significant effects which, as a result of substantial new information which was not known at the time the EIR was certified, are determined to have a more severe adverse impact than discussed in the prior EIR.

Section 15183(c) further specifies that if an impact is not peculiar to the parcel or to the proposed project, has been addressed as a significant effect in the prior EIR, or can be substantially mitigated by the imposition of uniformly applied development policies or standards, then an additional EIR need not be prepared for that project solely on the basis of that impact.

2. Sonoma County General Plan 2020 EIR

The Sonoma County General Plan 2020 and its associated EIR (SCH# 2003012020) were certified in August 2008. The General Plan designates land uses defining the type and amount of development that can occur throughout the County through the planning horizon year of 2020. General Plan 2020 also includes projections for residential densities (number of units) and building intensities for land use designations, including a slight reduction in the acreage of agriculturally zoned lands. The project has a maximum buildout potential of an additional 147,660 residents and an additional 23,435,087 square feet of non-residential use, including agriculture by the 2020 horizon year.

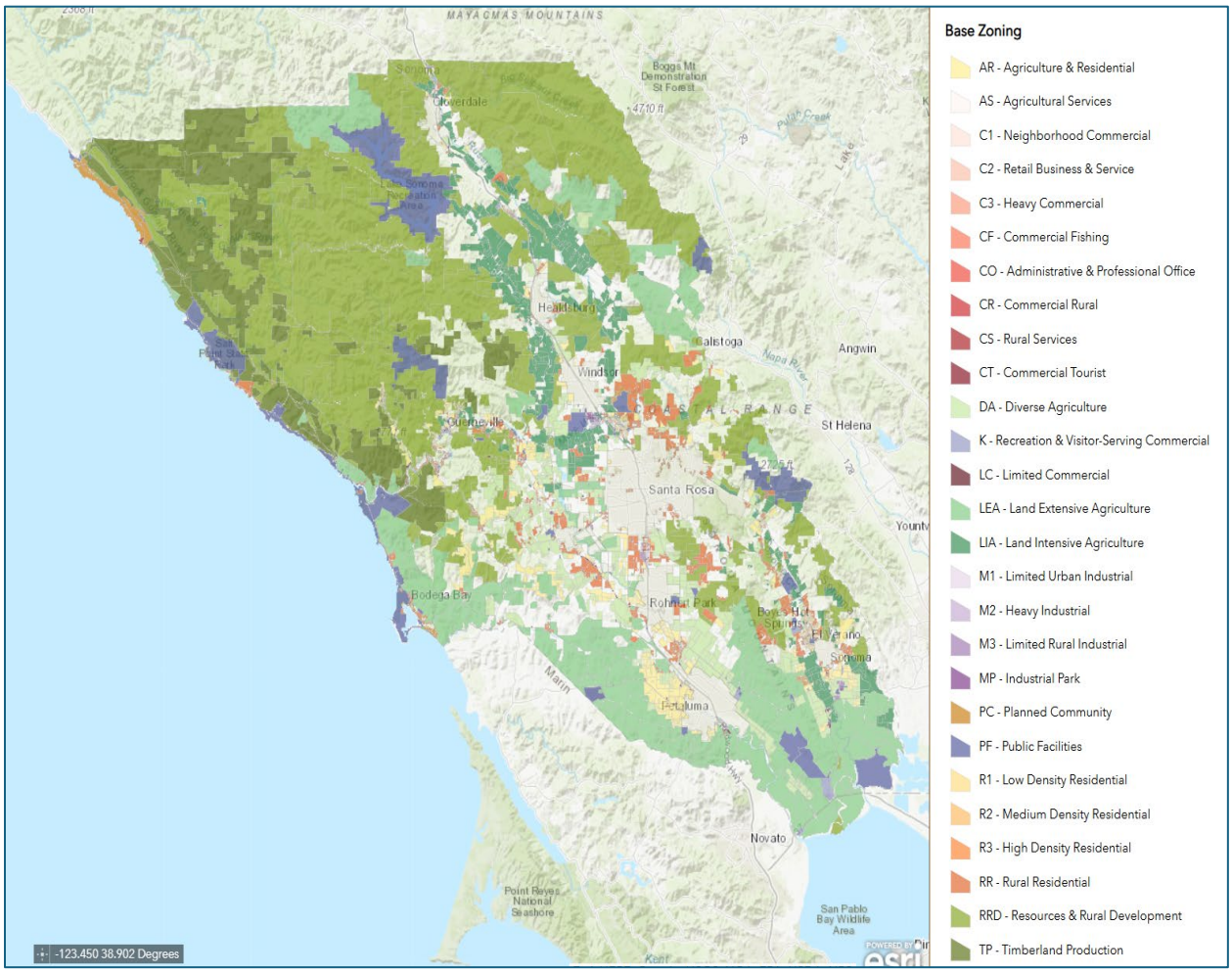
The General Plan 2020 EIR comprehensively evaluated environmental impacts that would result from the General Plan's implementation, including information related to existing site conditions, analyses of the types and magnitude of project-level and cumulative environmental impacts, and feasible mitigation measures that could reduce or avoid environmental impacts.

III. Project Background

1. Project location

The Farmworker Housing Ordinance includes zoning changes affecting parcels zoned land extensive agriculture (LEA), land intensive agriculture (LIA), diverse agriculture (DA) and rural and resource development (RRD).

Exhibit 1: County of Sonoma – Zoning Map



2. Environmental Setting

Located along the Pacific coastline, Sonoma County is the most northerly and the largest of the nine counties of the San Francisco Bay Area Region. The county is located about 40 miles north of San Francisco, along the western edge of San Francisco Bay (see Exhibit 1). Sonoma County encompasses almost 1,500 square miles, including the area within the county's incorporated cities. Sonoma County is bordered by the Pacific Ocean on the west, Marin County and San Pablo Bay to the south, Lake, Napa, and Solano counties to the east, and Mendocino County to the north. There are nine incorporated cities within the county: Cloverdale, Cotati, Healdsburg, Petaluma, Rohnert Park, Santa

Rosa, Sebastopol, Sonoma, and Windsor. Highway 101 is the primary north-south route through the center of county, with Highway 1 following the coastline and Highway 116 traversing the county in a roughly east-west direction.

3. Background

The project is proposed to implement the goals and policies of the Sonoma County General Plan 2020 Agricultural Resources Element. The project also implements the policies and programs of the 2023 Housing Element to provide housing for farmworkers and low-income residents through implementation of Program 15G which directed staff to reduce qualifying thresholds for onsite farmworker units and update the zoning code for consistency with the State Employee Housing Act for agricultural employee housing.

The Agricultural Resources Element defines agriculture as an industry which produces and processes food, fiber, plant materials, and which includes the raising and maintaining of farm animals including horses, donkeys, mules, and similar livestock. The purpose of the element is to establish policies to insure the stability and productivity of the County's agricultural lands and industries. The element is intended to provide clear guidelines for decisions in agricultural areas. It is also intended to express policies, programs and measures that promote and protect the current and future needs of the agricultural industry. If future technology, and/or enterprises, of the agriculture industry require alternative and yet unforeseen policies and implementation mechanisms, those should be consistent with the County's commitment to encourage the maintenance of a healthy agriculture sector of the County's economy.

As discussed below, the goals and policies of the agricultural resources element include supporting farms, increasing the viability of diversified small family farms and improve opportunities for farmworkers. The policies specifically include provisions support adequate housing in addition to permitted densities according to the needs of the agricultural industry.

The Farmworker Housing Ordinance will implement these General Plan policies by removing barriers for additional agricultural employee housing on parcels in agricultural cultivation. To remain consistent with the EHA, the code will be updated so that agricultural employee housing permitted by HCD is treated as an agricultural use, subject to the same permitting requirements and development standards as agricultural uses in that zoning district.

General Plan Goals and Policies

Goal AR-1: Promote a healthy and competitive agricultural industry whose products are recognized as being produced in Sonoma County.

> **Policy AR-1e**: Encourage and support farms and ranches, both large and small, that are seeking to implement programs that increase the sustainability of resources, conserve energy, and protect water and soil in order to bolster the local food economy, increase the viability of diverse family farms and improve the opportunities for farm workers.

Goal AR-7: Support efficient management of local agricultural production activities by the development of adequate amounts of farm worker and farm family housing in agricultural areas.

Policy AR-7a: Permit permanent employee housing in addition to permitted density according to the needs of a particular sector of the agricultural industry. Express in the Development Code specific criteria to establish the number of agricultural employee units.

4. Project Elements

The project proposes municipal code amendments that will reduce the minimum required number of cattle, sheep, goats, horses, hogs, and/or chickens to qualify for an onsite farmworker dwelling. The revisions will reduce the minimum acres of grapes, orchard crops, and add criteria for vegetables and cut flowers to qualify for an onsite farmworker dwelling. Consistent with the California Employee Housing Act, the municipal code amendments will treat agricultural employee housing units permitted by HCD as an agricultural use. The municipal code amendments proposed in the Project are consistent with the General Plan 2020 and EIR.

IV. Evaluation of Environmental Effects

The following findings are made in compliance with CEQA Section 15183 for a project consistent with the General Plan.

Section 15183 of the State CEQA Guidelines states that a project shall qualify for an exemption if the following findings can be made:

1) The project is consistent with the development density established by existing zoning, community plan or general plan policies for which an EIR was certified.
2) There are no project-specific effects which are peculiar to the project or its site, and which the General Plan 2020 EIR failed to analyze as significant effects.
3) There are no project-specific impacts which the General Plan 2020 EIR failed to analyze as significant effects.
4) There are no potentially significant offsite and/or cumulative impacts that the General Plan 2020 EIR failed to evaluate.
5) There is no substantive new information that results in more severe impacts than anticipated by the General Plan 2020 EIR.

A discussion of staff's finding of each potential environmental effect is provided below.

1. Density

Finding

The Project is consistent with the development density established by General Plan 2020.

Discussion

The Project will potentially generate additional dwelling units for farmworkers. These are additional to existing density limits. However, to meet the General Plan internal consistency requirements as provided in Government Code Section 65300.5, the Land Use Maps must provide enough development capacity for the projected growth to be accommodated. In a rural county like Sonoma

County, the Land Use Maps must actually provide additional capacity for growth beyond the minimum needed to accommodate the projections. This additional capacity is necessary because many factors will prevent the theoretical buildout to be reached, including environmental conditions, infrastructure, public services, economics, property owner desires, and other constraints prohibiting some properties from being developed at the maximum level allowed.

The full buildout of the Land Use Maps is not likely to be reached either during or after the planning period. One example of this limitation on growth is the physical constraint to accommodate standard septic systems. The analysis of the potential impacts of Draft GP 2020 is based on projected growth, not the theoretical buildout of all land use designations. In analyzing the potential impacts of General Plan 2020, the EIR properly considered the reasonably foreseeable impacts of the growth and development that would likely occur as a result of the plan.

Residential uses include all lands that show residential density, including agricultural and resource lands. Future growth projected to occur on residential lands reflect assumptions regarding second units, farmworker housing, and other units that are allowed in addition to the primary units allowed by density.

Future growth of agricultural uses cannot be accurately predicted solely from the Land Use Maps. Agricultural cultivation is allowed in almost every land use category. Agricultural support uses and visitor serving uses are assumed to occur on agricultural lands, but not every parcel on agricultural and resource lands will be occupied by these uses. Analysis of "buildout" of these uses based upon the assumption that every parcel will be developed, is unrealistic, both economically and physically. Therefore, the EIR assumed a smaller, more realistic increase in the level of production and related uses as noted above. It is unrealistic and unnecessarily speculative for the DEIR to analyze a higher level of city growth than is planned by the cities, as reflected in their adopted general plans.

2. Effects

Finding

All potential impacts from the Project were evaluated with the General Plan 2020 EIR. The proposed ordinance has no additional impacts that are peculiar to the project that were not evaluated within the EIR.

Discussion

The Project changes to the municipal code directly implement the goals and programs of General Plan 2020 to support the agricultural sector and remove barriers to affordable housing for farmworkers. The impacts of additional farmworker housing were analyzed in the EIR. The ordinance amends thresholds for farmworker housing in agricultural zones broadly. No specific parcel or unique features are considered in the proposed code revisions.

3. Impacts

Finding

There is no new information as a result of the proposed ordinance amendments that would result in more severe impacts. The amendments are consistent with General Plan 2020 density and agricultural zoning designations. All potential impacts were evaluated with the General Plan EIR.

Discussion
Even though changes to residential density are not specifically mentioned in the General Plan 2020 goals and policies for farmworker housing, these changes are implied within Policies AR-1e and AR-7a in the ability to support local agriculture and provide greater housing options for farmworkers. The increase in housing intensity is consistent with the density assumptions that were considered in General Plan 2020 and would support the implementation of Policies AR-1e and AR-7a.

4. Cumulative Impacts

Finding
There are no potentially significant offsite and/or cumulative impacts as a result of the proposed ordinance amendments that the General Plan 2020 EIR failed to evaluate.

Discussion
The project is consistent with the increase in housing intensity is consistent with the density assumptions that were considered in the General Plan 2020 EIR. The EIR considered the incremental impacts of farmworker housing and no potentially significant off-site or cumulative impacts have been identified which were not previously evaluated.

5. New Information

Finding
There is no substantial new information that results in more severe impacts than anticipated by the General Plan 2020 EIR.

Discussion
There is no new information as a result of the proposed ordinance that would result in more severe impacts. These zoning amendments are consistent with the General Plan 2020 density and Land Use element. All potential impacts were evaluated with the General Plan 2020 EIR.

Reducing thresholds for farmworker housing on agricultural property is essential to support the agricultural sector in Sonoma County. These regulatory adjustments help to create more affordable housing options by allowing for previously approved densities in General Plan 2020 to be applied on existing lots, reducing the barriers for property owners and farmers to make long-term, diversified agriculture more viable. These changes aim to support the County's General Plan housing goals by creating more opportunities for increasing the availability of lower-income housing for farmworkers near agriculture, while still maintaining consistency with existing regulations.

V. Determination

Summary of Findings: Section 15378 of the California Environmental Quality Act (CEQA) defines a "Project" as an activity that (1) is a discretionary action by a governmental agency; and (2) will either have a direct or reasonably foreseeable indirect impact on the environment. (Pub.Res. Cod, § 21065). "Project" means the whole of the action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment, and that is any of the following: An activity directly undertaken by any public agency including but not limited to public works construction and related activities, clearing or grading of land, improvements to existing public structures, enactment and amendment of zoning ordinances, and the adoption and amendment of local General Plans or elements thereof pursuant to Government Code Sections 65100-65700.

The project includes zoning code amendments to the Sonoma County Municipal Code in order to enact the goals and policies of the Sonoma County General Plan 2020 and associated EIR regarding farmworker housing. In implementing this housing type, the amendments are designed to also aid in meeting the County's Regional Housing Needs Allocation (RHNA) by removing barriers present on existing agricultural land to promote on-site affordable housing.

While the project is intended to facilitate housing development within unincorporated Sonoma County, it does not include specific development designs or proposals, nor does it grant any entitlements for development. Development could also result in impacts to the physical environment depending site-specific factors. However, the location, intensity, siting, and timing of development is unknown.

All future development associated with the proposed zoning code amendments would be in zoning districts where housing development is already generally allowed by right, or with approval of a zoning permit. Development could result in impacts to the physical environment depending site-specific factors. All future development would be analyzed on a project-level basis for consistency with building and safety codes. Depending on site-specific factors, future development could also require discretionary and environmental review as applicable.

In accordance with CEQA Guidelines Section 15183, the Project qualifies for an exemption because the following findings can be made:

1) The project is consistent with the development density established by existing zoning, community plan or general plan policies for which an EIR was certified.
2) There are no project-specific effects which are peculiar to the project or its site, and which the General Plan 2020 EIR failed to analyze as significant effects.
3) There are no project-specific impacts which the General Plan 2020 EIR failed to analyze as significant effects.
4) There are no potentially significant offsite and/or cumulative impacts that the General Plan 2020 EIR failed to evaluate.

5) There is no substantive new information that results in more severe impacts than anticipated by the General Plan 2020 EIR.

Eric Gage
Signature

10/13/2025
Date

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