

June 2025 | General Plan EIR Addendum

ADDENDUM TO THE PROGRAM EIR
SCH No. 2018031066
FOR THE
**GENERAL PLAN REVIEW AND ZONING
ORDINANCE UPDATE**
County of Fresno

Prepared for:

County of Fresno
Public Works and Planning Department
2200 Tulare Street
Fresno, California 93721

Prepared by:

PlaceWorks
101 Parkshore Drive, Suite 200
Folsom, California 95630
916.276.0616
www.placeworks.com

Table of Contents

Section	Page
1. Addendum	3
1.1 Background	3
1.2 General Plan EIR	3
1.3 Project Description	6
1.4 Purpose of an EIR Addendum	7
2. CEQA Analysis	10
1.5 Environmental Analysis	10
1.6 Findings	12
1.7 Determination	13

Tables	Page
Table 1-1: General Plan EIR Impact Summary of Significant and Unavoidable Impacts	4

A copy of this addendum, and all supporting documentation, may be reviewed or obtained at the County of Fresno Public Works and Planning Department, 2200 Tulare Street, Fresno, California 93721.

Table of Contents

This page intentionally left blank.

1. Addendum

1.1 BACKGROUND

The County of Fresno is proposing to adopt the Sixth-Cycle Housing Element and to make minor amendments to the Zoning Ordinance in order to identify the County's strategy and programs to comply with state housing law, addressing both existing and future housing needs. (proposed project).

In December 2024, the County rezoned parcels in order to accommodate the lower income portion of its 2023-2031 Regional Housing Needs Allocation (RHNA). These parcels are listed in the Housing Element for documentation of the County's RHNA capacity, but no further changes are needed or proposed that would intensify or alter the General Plan or Zoning categories for these parcels. The Housing Element Update incorporates these rezoned parcels into the County's housing strategy to address future housing needs.

The County's Program Environmental Impact Report for the General Plan Review and Zoning Ordinance Update (General Plan EIR) anticipated the overall RHNA and the policies in the General Plan address the physical impacts resulting from anticipated development in Fresno County and so serves, with addendum, as the environmental documentation for the County's amendments to the General Plan and Zoning Ordinance. This addendum to the County's General Plan EIR (certified in February 2024; State Clearinghouse Number 2018031066) demonstrates that the analysis in the General Plan EIR adequately addresses the potential physical impacts associated with implementation of this proposed project and the proposed project would not trigger any of the conditions described in CEQA Guidelines Section 15162 calling for further environmental review.

1.2 GENERAL PLAN EIR

Table 1-1 summarizes the topics discussed in the General Plan EIR where potential impacts were found to be significant and unavoidable, even with applicable mitigation. While the measures from the General Plan EIR, as well as compliance with applicable laws, regulations, and goals and policies of the General Plan reduce potentially significant impacts to a less than significant level for most topics, the topics of agriculture, air quality, cultural resources, geology and soils, greenhouse gas emissions, transportation, tribal cultural resources, utilities and service systems, and wildfire have significant and unavoidable impacts.

1. Addendum

Table 1-1: General Plan EIR Impact Summary of Significant and Unavoidable Impacts

Topic	Significant and Unavoidable Impacts
Agriculture	<p>Impact AG-1. The GPR/ZOU is designed to encourage the continued operation of existing agriculture lands and Forest lands in The Planning Area. However, buildout of the GPR/ZOU could result in the conversion of Farmland or forestland to nonagricultural use. Therefore, impacts would be significant and unavoidable.</p> <p>Impact AG-2. Buildout of the GPR/ZOU could result in conflicts to existing zoning for agricultural uses and Williamson Act contracts. Therefore, impacts would be significant and unavoidable.</p>
Air Quality	<p>Impact AQ-1. Development facilitated by the GPR/ZOU would generate construction and Operational-related emissions. Emissions generated by the GPR/ZOU would conflict with implementation of the 2016 Ozone Plan and 2018 PM2.5 Plan. Implementation of policies in the GPR/ZOU, compliance with existing regulations, and mitigation measures would not be sufficient to demonstrate consistency with the 2016 Ozone Plan and 2018 PM2.5 Plan. Impacts would be significant and unavoidable.</p> <p>Impact AQ-2. Individual development projects carried out under the GPR/ZOU would generate construction and operational-related emissions. Implementation of Plan policies, compliance with existing regulations, and implementation of proposed mitigation would reduce construction and operational emissions, but emissions would remain above applicable thresholds. impacts would be significant and unavoidable.</p> <p>Impact AQ-3. Individual development projects carried out under the GPR/ZOU would generate construction- and operational-related emissions that may expose sensitive receptors to substantial pollutant concentrations. Such emissions may result in adverse impacts to local air quality. Implementation of Plan policies and compliance with existing regulations would reduce emissions, but not below the level of significance. Impacts would be significant and unavoidable.</p>
Cultural Resources	<p>Impact CR-1. Implementation of the GPR/ZOU has the potential to impact built environment historical resources. Impacts would be significant and unavoidable even with the incorporation of mitigation.</p> <p>Impact CR-2. Implementation of the GPR/ZOU has the potential to impact archaeological resources. Impacts would be Significant and unavoidable, even with the incorporation of mitigation.</p>
Geology and Soils	<p>Impact GEO-5. Individual development projects facilitated by the GPR/ZOU may result in ground disturbance that has the potential to directly or indirectly destroy a paleontological resource or unique geologic feature. 2042 General Plan Policies would ensure that individual discretionary development projects are reviewed, designed, and mitigated to reduce potential impacts to paleontological resources; however, this policy would not apply to all development facilitated by the GPR/ZOU. This would be a potentially significant impact, and there would be no feasible mitigation. Therefore, impacts would be significant and unavoidable.</p>
Greenhouse Gas Emissions	<p>Impact GHG-1. development envisioned under the GPR/ZOU would generate both short-term and long-term GHG emissions. Implementation of the GPR/ZOU would result in GHG emissions exceeding the locally applicable, project-specific efficiency thresholds. Impacts would be significant and unavoidable.</p>
Transportation	<p>Impact T-2. The proposed Fresno County GPR/ZOU would result in an increase in VMT per capita and an increase in VMT per employee above 87 percent of the baseline 2019 countywide conditions. VMT per capita and VMT per employee impacts from implementation of the proposed GPR/ZOU would be significant and unavoidable.</p>
Tribal Cultural Resources	<p>Impact TCR-1. Implementation of the proposed project has the potential to impact tribal cultural resources. Impacts would be significant and unavoidable.</p>
Utilities and Service Systems	<p>Impact UTL-1. Development facilitated by the GPR/ZOU would require new connections to existing utilities, and may require new or expanded utility infrastructure to accommodate future growth, particularly for the provision of water supply and wastewater treatment. Improvements would also be required for stormwater drainage, electricity, natural gas, and telecommunications, which may require the construction of new facilities. Future development would be consistent with goals and policies in the 2042 General Plan which help to reduce impacts.</p>

1. Addendum

Table 1-1: General Plan EIR Impact Summary of Significant and Unavoidable Impacts

Topic	Significant and Unavoidable Impacts
	<p>However, it is not known where or how extensive new facilities would be required; therefore potential impacts would be significant and unavoidable.</p> <p>Impact UTL-2. Development facilitated by the GPR/ZOU would result in incrementally increased water demands tied to population growth. Although future development would be consistent with goals and policies in the 2042 General Plan, including for water supply availability and reliability, it cannot be determined whether sufficient water supplies are available to accommodate this growth. Impacts would be significant and unavoidable.</p> <p>Impact UTL-3. Development facilitated by the GPR/ZOU would increase wastewater production, and sufficient treatment capacity is available at the existing Fresno-Clovis RWRF to accommodate this increase. However, because the location of future growth is not known, it cannot be determined whether all new wastewater would be diverted to the Fresno-Clovis RWRF, or if new wastewater treatment facilities would be required. Therefore, although future development would be consistent with goals and policies in the 2042 General Plan to minimize impacts, if new wastewater treatment facilities would be necessary to accommodate growth locations, impacts would be significant and unavoidable.</p> <p>Impact UTL-4. Development facilitated by the GPR/ZOU would increase solid waste generation in the county. Future development would be required to comply with State and local regulations related to solid waste, as well as applicable goals and policies in the 2042 General Plan. However, the existing landfill which accommodates most solid waste disposal in the county will reach capacity in 2031, and alternate disposal location(s) have not yet been identified or developed. Therefore, sufficient solid waste disposal capacity is not currently available to accommodate anticipated growth. impacts would be significant and unavoidable.</p>
Wildfire	<p>Impact WFR-2. The GPR/ZOU would not facilitate urban development in areas most susceptible to wildfire. Prevailing wind and slopes would generally spread fire away from areas where urban development is envisioned. However, there remains a possibility that development under the GPR/ZOU would occur in areas in proximity to MFHSZ, HFHSZ, and VHFHSZ that could lead to a significant risk of loss, injury, or death involving wildland fires. Impacts would be significant and unavoidable.</p>

1. Addendum

1.3 PROJECT DESCRIPTION

Under the proposed project the County of Fresno is proposing to amend the General Plan and Zoning Ordinance to adhere to state housing law, including minor zoning text amendments to provide additional clarity on development processing procedures.

1.3.1 Housing Element Update

The County is required by law to update its Housing Element to address the eight-year planning period of 2023-2031 (Sixth Cycle) and the associated housing needs of existing and future residents. The Sixth-Cycle Housing Element covers the same topics and largely retains the same structure as the Fifth-Cycle Housing Element, with the Sixth-Cycle update adding further narrative based on new state laws the certification process: a summary of needs and conditions, more in-depth analysis of fair housing conditions, and a more detailed summary of public outreach. The majority of the Housing Element documents the socioeconomic and demographic makeup of the County, past trends related to fair housing, current regulations for housing and similar uses, and the performance of the County's past housing programs. This information is purely a restatement of historical patterns and the existing setting.

The only two sections of the Housing Element that reflect potential future activity are the Sites Inventory section, which describes the land inventory needed to address the County's fair share of potential future housing growth, and the Action Plan section, which identifies the programs, actions, and resources the County will take and/or make available to address existing and future housing needs.

As discussed in the updated Element, the County's RHNA for the 2023-2031 planning period is 2,350 units. The County's obligation is only to demonstrate that there is sufficient land with the appropriate General Plan land use designation and zoning to accommodate the 2,350-unit RHNA. The County is neither required to build the units detailed in the RHNA nor are property owners required to build the units detailed in the RHNA. While there is enough housing capacity in the existing General Plan to accommodate the entire RHNA, the State Department of Housing and Community Development (HCD) establishes additional criteria to demonstrate capacity for the lower income portion of the RHNA. Based on coordination with HCD, the County must identify capacity on parcels designated with higher density land use zoning to address 769 units of the lower income RHNA. The capacity to accommodate the balance of the County's lower, moderate, and above moderate income RHNA is documented in the Housing Element through parcels that are already consistent with the currently adopted General Plan and Zoning and development applications that have already completed or are underway with the entitlement process. The updated Housing Element documents the residential capacity on these parcels that exist independently of the Housing Element.

The County's housing strategy primarily focuses on addressing the housing needs of existing residents through programs that facilitate financial assistance, streamlining regulations, and affirmatively furthering fair housing. The only programs that overlap with the direct development of new housing are those committing the County to maintain an adequate land inventory to accommodate any unmet RHNA allocation, should the current inventory be developed in a manner that falls short during the planning period. This includes the identification of parcels that were recently redesignated and rezoned to accommodate the remaining 759 units of lower

1. Addendum

income RHNA. These land use changes were completed in December 2024 and are not part of the proposed project.

1.3.2 Zoning Ordinance Text Update

The County adopted Ordinance No. R-505-3871 and Resolution No. 24-410 on December 17, 2024, to change the Zoning and General Plan consistent with the “Future” designations for parcels listed in Table 1A-8 of the Housing Element. While the adopted Ordinance and Resolution referenced adherence to State law that concerns minimum density and by-right processing requirements, HCD requested that the County adopt specific language in its Zoning Ordinance to ensure consistency with State law is explicit and clear. Accordingly, the County is proposing the following text amendments.

Article 2: Zones, Allowable Land Uses

- Add #3 to 810.2.020 to describe by right processing requirements related to sites rezoned for lower income housing.
- Add note to Table 2-5 to reference 810.2.020 on minimum density requirements.

Article 7: Definitions:

- Add "By right" as a definition, drawing language directly from California Government Code section 65583.2(i) and from HCD's Sites Inventory Guidebook, page 12.
- Add “Ministerial” definition that direct back to the “By right” definition.

These changes merely reflect existing State law and are consistent with the County’s previously adopted Ordinance No. R-505-3871 and Resolution No. 24-410.

1.4 PURPOSE OF AN EIR ADDENDUM

An addendum to a General Plan EIR is appropriate when the proposed changes are ‘minor’ in the context of the original General Plan Update. When an EIR has been certified or negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:

CEQA Guidelines Section 15164 (Addendum to an EIR):

- (a) The lead agency or 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 Section 15162 calling for preparation of a subsequent EIR have occurred.
- (b) An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.

1. Addendum

- (c) An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration.
- (d) The decision-making body shall consider the addendum with the final EIR or adopted negative declaration prior to making a decision on the project.
- (e) A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.

CEQA Guidelines Section 15162 (Subsequent EIRs and Negative Declarations) reads:

When an EIR has been certified or negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:

- (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- (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 or negative declaration was adopted, shows any of the following:
 - (a) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
 - (b) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - (c) Mitigation Programs 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 Program or alternative; or
 - (d) Mitigation Programs or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation Program or alternative.

This document provides the substantial evidence required by CEQA Guidelines Section 15164(e) to support the finding that a subsequent EIR is not required and an addendum to the General Plan EIR is the appropriate environmental document to consider the proposed project.

1. Addendum

This page intentionally left blank.

2. CEQA Analysis

1.5 ENVIRONMENTAL ANALYSIS

The General Plan contains policies related to economic development, agriculture and land use, transportation and circulation, public facilities and services, open space and conservation, health and safety, environmental justice, and housing. The General Plan incorporates policies and implementation programs that guide future short- and long-term decision making, the creation and execution of master plans, the formation and refinement of budgets and capital improvements, and the regulation of development through the application and enforcement of various codes and ordinances. Many of these policies and programs are also designed to address and mitigate environmental impacts related to implementing the General Plan. The policies of the General Plan and the existing development standards apply to all development in the unincorporated county and would continue to apply to the lands that are the subject of the proposed project.

As previously stated, the majority of the Housing Element documents the socioeconomic and demographic makeup of the County, past trends related to fair housing, current regulations for housing and similar uses, and the performance of the County's past housing programs. This information is purely a restatement of historical patterns and the existing setting. The only two sections of the Housing Element that reflect potential future activity are the Sites Inventory section, which describes the land inventory needed to address the County's fair share of potential future housing growth, and the Action Plan section, which identifies the programs, actions, and resources the County will take and/or make available to address existing and future housing needs.

As discussed in the updated Element, the County's RHNA for the 2023-2031 planning period is 2,350 units. The County's obligation is only to demonstrate that there is sufficient land with the appropriate General Plan land use designation and zoning to accommodate the 2,350-unit RHNA. The County is neither required to build the units detailed in the RHNA nor are property owners required to build the units detailed in the RHNA.

With the adoption of Ordinance No. R-505-3871 and Resolution No. 24-410 on December 17, 2024, the County completed its rezoning efforts to accommodate its RHNA allocation. Accordingly, all the required zoning is currently in place and has been addressed by prior planning efforts and associated environmental clearances (specifically an addendum to the Program EIR certified in February 2024; State Clearinghouse Number No. 2018031066).

As previously stated, the proposed Zoning Ordinance text amendments merely reflect existing State law and are consistent with the County's previously adopted Ordinance No. R-505-3871 and Resolution No. 24-410.

The policies and regulations identified in the General Plan EIR to reduce physical environmental effects would continue to apply to future development and would reduce impacts to the same significance level as identified in the General Plan EIR. Examples of General Plan policies are listed below:

2. CEQA Analysis

- Policy OS-A.20 Minimization of Sedimentation and Erosion. The County shall minimize sedimentation and erosion through control of grading, cutting of trees, removal of vegetation, placement of roads and bridges, and use of off-road vehicles. The County shall discourage grading activities during the rainy season unless adequately mitigated to avoid sedimentation of creeks and damage to riparian habitat.”
- Policy OS-A.21 Best Management Practices. The County shall continue to require the use of feasible and practical best management practices (BMPs) to protect streams from the adverse effects of construction activities and urban runoff.
- Policy OS-E.2 Construction Buffers. The County shall require adequate buffer zones between construction activities and significant wildlife resources, including both onsite habitats that are purposely avoided and significant habitats that are adjacent to the project site, in order to avoid the degradation and disruption of critical life cycle activities such as breeding and feeding. The width of the buffer zone should vary depending on the location, species, etc. A final determination shall be made based on informal consultation with the US Fish and Wildlife Service and/or the California Department of Fish and Wildlife.
- OS-G.12 Architectural Coating Reactive Organic Gases Content Limits. The County shall require future development projects under the GPR/ZOU, to the maximum extent feasible, to use architectural coating materials, as defined in the San Joaquin Valley Air Pollution Control District’s (SJVAPCD) Rule 4601, that are zero-emission or have a low-ROG content (below 10 grams per liter). Where such ROG coatings are not available, or feasible, the coating with the lowest ROG rating available shall be used. These measures shall be noted on all construction plans, and the County shall perform periodic site inspections during construction to verify compliance.
- HS-H.1 Minimize Noise Impacts. The County shall require that all proposed development incorporate design elements necessary to minimize adverse noise impacts on surrounding land uses.

Moreover, the County requires building permit and development review process which is independent of the CEQA process. As well, prior to issuance of any building permit, a project applicant is required to pay development fees, which would address potential impacts to public services and regional transportation improvements.

Therefore, these amendments to the General Plan and Zoning Ordinance would not result in new significant effects or a substantial increase in the severity of previously identified significant effects requiring major revisions to the General Plan EIR. Furthermore, the amendments to the General Plan and Zoning Ordinance do not approve any specific development and any future project(s) would have to undergo environmental review, consistent with CEQA.

2. CEQA Analysis

1.6 FINDINGS

The following identifies the standards set forth in Section 15162 of the CEQA Guidelines as they relate to the proposed project.

- 1. No substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; and 2. No substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.**

The proposed project will update the Housing Element and Zoning Ordinance to demonstrate compliance with State law through minor changes in policy direction and programmatic support to direct financial and technical resources to support existing households and support the development of new housing on sites already designated and zoned for housing. The proposed project does not contain any changes to land use that would result in any increase in developable acres or population growth. Therefore, the proposed project would not change the conclusions of the EIR and would not require revisions to the General Plan EIR due to new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

No 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 EIR was certified shows:

- a. The project will have one or more significant effects not discussed in the previous EIR.**

The proposed project would establish policy direction and programmatic support to construct dwelling units throughout the unincorporated areas of the County. Construction of dwelling units was projected in the General Plan and evaluated in the General Plan EIR. No changes to land use are proposed that would result in any increase in developable acres or population growth. Rather, the County is, through the Housing Element Update, identifying where growth may be accommodated in order to address the requirements of State law and to provide for an efficient development pattern by placing more housing next to services, thereby reducing vehicle miles traveled and expanding housing opportunities for a wide range of households.

The policies and mitigation measures identified in the General Plan EIR, and all existing regulations, would continue to apply to all development and would have the same mitigating effect as disclosed in the General Plan EIR. As the type and style of development described in the Housing Element is similar to housing projected in the General Plan and EIR, there is no new information that was not known and could not have been known at the time the General Plan EIR was certified demonstrating that the project would have one or more significant effects not discussed in the previous EIR. The process of development and construction of vacant land rural residential housing units (half-acre lots) effectively disturbs the land as

2. CEQA Analysis

much as more intense residential development. Additionally, multifamily patterns of development tend to result in a more efficient use of resources and lower emissions compared to rural growth patterns.

b. Significant effects previously examined will be substantially more severe than shown in the previous EIR.

The proposed project would not substantially change the significant impacts as those disclosed in the General Plan EIR. The General Plan policies and mitigation measures identified in the General Plan EIR to reduce physical environmental effects would apply to all new development, including sites listed in the Housing Element. These policies would have the same mitigating effect as disclosed in the General Plan EIR. There is no new information that would demonstrate that significant effects examined would be substantially more severe than shown in the General Plan 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.

All policies and mitigation measures identified in the General Plan EIR would continue to apply to all development in the unincorporated county and would have the same mitigating effect as disclosed in the General Plan EIR. The proposed project would not change the assumptions described in the General Plan EIR and therefore would not substantially change the conclusions of the EIR or require new mitigation measures.

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

The proposed project would have the same significant impacts as the previously certified General Plan EIR, and all associated policies and mitigation measures identified in the General Plan EIR to reduce physical environmental effects would apply to all future development. No changes to land use are proposed that would result in any increase in developable acres or population growth. No new mitigation measures or alternatives to the proposed project would be required.

1.7 DETERMINATION

For the reasons explained in this addendum, the project would not cause any new significant environmental impacts or substantially increase the severity of significant environmental impacts disclosed in the General Plan EIR. Thus, the proposed project does not trigger any of the conditions in CEQA Guidelines Section 15162 requiring preparation of a subsequent EIR, and the appropriate environmental document as authorized by CEQA Guidelines Section 15164(b) is an addendum.