

**ATTACHMENT D –
ENVIRONMENTAL
DOCUMENTATION**



County of San Diego

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AN ADDENDUM TO THE PREVIOUSLY ADOPTED ENVIRONMENTAL IMPACT REPORT FOR THE COUNTY OF SAN DIEGO GENERAL PLAN UPDATE, LOG NO. 02-ZA-001

FOR PURPOSES OF CONSIDERATION OF AN AMENDMENT TO THE SAN DIEGO COUNTY ZONING ORDINANCE RELATED TO APPLICABILITY OF THE ZONING ORDINANCE, DEFINITIONS, EMERGENCY SHELTER CLASSIFICATION, AND GENERAL REGULATIONS PDS2020-POD-20-008; LOG NO. PDS2020-ER-20-20-001

September 17, 2021

CEQA Guidelines, Section 15164(b) states that an Addendum to a previously adopted EIR or Negative Declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 or 15163 calling for the preparation of a subsequent or supplemental EIR or subsequent Negative Declaration have occurred.

Discussion:

There are some minor changes and additions, which need to be included in an Addendum to the previously certified Environmental Impact Report (EIR) to accurately cover the new project. The additions are underlined and deletions are struck out. The changes and additions consist of the following:

1. To the Project Name add An Amendment to the San Diego County Zoning Ordinance Related to Applicability of the Zoning Ordinance, Definitions, Emergency Shelter Classification, and General Regulations
2. To the Project Numbers add PDS2020-POD-20-008; PDS2020-ER-20-20-001
3. To the first paragraph add as indicated: "The EIR for this project is comprised of this form along with the Environmental Review Update Checklist Form for Projects with a Previously Approved Environmental Document dated September 17, 2021, which includes the following forms attached."
 - A. The previously adopted Environmental Impact Report, dated August 3, 2011;
 - B. An Addendum to the previously adopted Environmental Impact Report with an Environmental Review Update Checklist Form for Projects with a Previously Approved Environmental Document dated September 17, 2021.



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September 17, 2021

Environmental Review Update Checklist Form For Projects with Previously Approved Environmental Documents

**FOR PURPOSES OF CONSIDERATION OF AN AMENDMENT TO THE SAN DIEGO
COUNTY ZONING ORDINANCE RELATED TO APPLICABILITY OF THE ZONING
ORDINANCE, DEFINITIONS, EMERGENCY SHELTER CLASSIFICATION, AND GENERAL
REGULATIONS
PDS2020-POD-20-008; PDS2020-ER-20-20-001**

The California Environmental Quality Act (CEQA) Guidelines Sections 15162 through 15164 set forth the criteria for determining the appropriate additional environmental documentation, if any, to be completed when there is a previously adopted Negative Declaration (ND) or a previously certified environmental impact report (EIR) covering the project for which a subsequent discretionary action is required. This Environmental Review Update Checklist Form has been prepared in accordance with CEQA Guidelines Section 15164(e) to explain the rationale for determining whether any additional environmental documentation is needed for the Zoning Ordinance Amendments Emergency Shelters and Housing Facilities.

1. Background on the previously certified EIR:

A Program EIR for the County's General Plan Update, Environmental Review Number 02-ZA-00, State Clearing House Number 2002111067, was certified by the Board of Supervisors on August 3, 2011 (GPU EIR). The GPU EIR evaluated potentially significant effects for the following environmental areas of potential concern: 1) Aesthetics; 2) Agricultural Resources; 3) Air Quality; 4) Biological Resources; 5) Cultural And Paleontological Resources; 6) Geology And Soils; 7) Hazards and Hazardous Materials; 8) Hydrology and Water Quality; 9) Land Use and Planning; 10) Mineral Resources; 11) Noise; 12) Population and Housing; 13) Public Services; 14) Recreation; 15) Transportation and Traffic; 16) Utilities and Service Systems, and 17) Climate Change.

Of these seventeen environmental subject areas, it was determined that only Geology/Soils and Population/Housing would not involve potentially significant impacts. The remaining environmental issues evaluated included impacts that would be significant and unavoidable except for the following four subject areas in which all impacts would be mitigated below a level of significance: Cultural and Paleontological Resources, Land Use and Planning,

Recreation, and Climate Change. For those areas in which environmental impacts will remain significant and unavoidable, even with the implementation of mitigation measures, overriding considerations exist which make the impacts acceptable. The GPU EIR is on file with the County of San Diego, Planning and Development Services.

- 2. Lead agency name and address:
 County of San Diego, Planning & Development Services
 5510 Overland Avenue, Suite 110
 San Diego, CA 92123

- a. Contact: Audrey Hamilton, Project Manager
- b. Phone number: (619) 323-6255
- c. E-mail: Audrey.Hamilton@sdcounty.ca.gov

- 3. Project applicant's name and address:

County of San Diego
Planning & Development Services
5510 Overland Ave., Suite 310
San Diego, CA 92123

- 4. Does the project for which a subsequent discretionary action is now proposed differ in any way from the previously approved project?

| | |
|-------------------------------------|--------------------------|
| YES | NO |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> |

The Amendment to the San Diego County Zoning Ordinance Related to Applicability of the Zoning Ordinance, Definitions, Emergency Shelter Classification, and General Regulations relates specifically to Emergency Shelters, Transitional and Supportive Housing. The amendment to the County of San Diego Zoning Ordinance is to exempt the development, use, or improvement of new or existing County-owned, operated, financed, leased, and/or contracted Emergency Shelters, Transitional, and Supportive Housing (Housing Facilities) from Zoning Ordinance provisions (project). The project would also expand the definition of "Emergency Shelter" to include 1) safety parking facilities that are not an RV park or mobile home park, 2) safe storage facilities, 3) safe camping facilities receiving direct financial assistance from the County of San Diego, State of California, or the Federal Government, and 4) day shelter facilities. No development is being proposed by the project under this discretionary action.

The changes to the Zoning Ordinance described above would not involve substantial changes in the magnitude of impacts identified in the GPU EIR. As explained in this Environmental Update Checklist, none of the proposed changes require major revisions of the GPU EIR due to new significant effects or the substantial increase in the severity of previously identified effects. There are no substantial changes with respect to the circumstances under which the proposed Zoning Ordinance Amendments for Emergency Shelters and Housing Facilities is undertaking that requires major revisions of the GPU EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

There is new information of substantial importance. The project would exempt County-owned, operated (by County or through a third party) Emergency Shelters and Housing Facilities from the Zoning Ordinance, which could not have been known with the exercise of reasonable diligence at the time the GPU EIR was certified. However, the project would not result in significant effects, or more severe effects, than the GPU EIR. The project does not propose any development under this discretionary action, and future development or improvement of new or existing Emergency Shelters and Housing Facilities would be required to conduct a subsequent environmental review prior to the authorization for individual project development. At the time a subsequent review is conducted, individual projects would be analyzed under CEQA for project-specific impacts and would apply GPU EIR mitigation measures, or other measures, as necessary.

5. **SUBJECT AREAS DETERMINED TO HAVE NEW OR SUBSTANTIALLY MORE SEVERE SIGNIFICANT ENVIRONMENTAL EFFECTS COMPARED TO THOSE IDENTIFIED IN THE PREVIOUS ND OR 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
- Aesthetics
- Agriculture and Forest Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology & Soils
- Greenhouse Gas Emissions
- Hazards & Haz Materials
- Hydrology & Water Quality
- Land Use & Planning
- Mineral Resources
- Noise
- Population & Housing
- Public Services
- Recreation
- Transportation/Traffic
- Tribal Cultural Resource
- Utilities & Service Systems
- Wildfire
- Mandatory Findings of Significance

DETERMINATION:

On the basis of this analysis, Planning & Development Services has determined that:

- 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 previously certified EIR or ND due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects. Also, there is no "new information of substantial importance" as that term is used in CEQA Guidelines Section 15162(a)(3). Therefore, the previously certified EIR or ND is adequate upon completion of an ADDENDUM.
- 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 or ND due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects. Also, there is no "new information of substantial importance" as that term is used in CEQA Guidelines Section 15162(a)(3). Therefore, because the project is a residential project in conformance with, and pursuant to, a Specific Plan with an EIR completed after January 1, 1980, the project is exempt pursuant to CEQA Guidelines Section 15182.
- 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 ND 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). However, all new significant environmental effects or a substantial increase in severity of previously identified significant effects are clearly avoidable through the incorporation of mitigation measures agreed to by the project applicant. Therefore, a SUBSEQUENT ND is required.
- 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 ND or 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.

Audrey Hamilton

Signature

September 17, 2021

Date

Audrey Hamilton

Printed Name

Project Manager

Title

INTRODUCTION

CEQA Guidelines Sections 15162 through 15164 set forth the criteria for determining the appropriate additional environmental documentation, if any, to be completed when there is a previously adopted ND or a previously certified EIR for the project.

CEQA Guidelines, Section 15162(a) and 15163 states that when an ND has been adopted or an EIR certified for a project, no Subsequent or Supplemental EIR or Subsequent Negative Declaration shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in light of the whole public 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.
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 the 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; or
 - b. Significant effects previously examined will be substantially more severe than shown in the previously adopted Negative Declaration or previously certified EIR; or
 - 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; or
 - d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous Negative Declaration or EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

CEQA Guidelines, Section 15164(a) states that an Addendum to a previously certified EIR may be prepared if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a Subsequent or Supplemental EIR have occurred.

CEQA Guidelines, Section 15164(b) states that an Addendum to a previously adopted Negative Declaration may be prepared if only minor technical changes or additions are necessary.

If the factors listed in CEQA Guidelines Sections 15162, 15163, or 15164 have not occurred or are not met, no changes to the previously certified EIR or previously adopted ND are necessary.

The following responses detail any changes in the project, changes in circumstances under which the project is undertaken, and/or "new information of substantial importance" that may cause one or more effects to environmental resources. The responses support the "Determination," above, as to the type of environmental documentation required, if any.

ENVIRONMENTAL REVIEW UPDATE CHECKLIST

I. AESTHETICS – Since the previous EIR was certified or previous ND was adopted, are there any changes in the project, changes in circumstances under which the project is undertaken, and/or "new information of substantial importance" that cause one or more effects to aesthetic resources including: scenic vistas; scenic resources including, but not limited to, trees, rock outcroppings, or historic buildings within a state scenic highway; existing visual character or quality of the site and its surroundings; or day or nighttime views in the area?

YES

NO

The GPU EIR identified impacts to scenic vistas, scenic resources, visual character or quality, and light and glare as potentially significant. Impacts to scenic vistas and resources were less than significant with mitigation; however, impacts to visual character or quality and light or glare were significant and unavoidable.

The Zoning Ordinance Amendments relating to Emergency Shelters and Housing Facilities would amend the County of San Diego Zoning Ordinance to exempt the development, use, or improvement of new or existing County-owned, operated, financed, leased, and/or contracted Emergency Shelters, Transitional, and Supportive Housing (Housing Facilities) from Zoning Ordinance provisions (project). The project would also expand the definition of "Emergency Shelter" to include 1) safety parking facilities that are not an RV park or mobile home park, 2) safe storage facilities, 3) safe camping facilities receiving direct financial assistance from the County of San Diego, State of California, or the Federal Government, and 4) day shelter facilities.

Future building or improvements to Emergency Shelters and Housing Facilities could potentially result in impacts to scenic vistas, scenic resources, and visual character or quality as would other building and housing developments. This project does not propose any development under this discretionary action. Furthermore, persons experiencing homelessness living on the streets has a negative visual connotation in communities. In order to provide the needed shelter and improve public services, the Emergency Shelters and Housing Facilities would be located in areas to address homelessness and related public health, safety, and welfare issues. By locating the shelters in areas to address homelessness and related public health, safety, and welfare issues, the population of persons experiencing homelessness would be concentrated to one location, compared to the baseline conditions. The County of San Diego has presented the Framework for Siting Emergency Shelters, Transitional and Supportive Housing, or Homeless Services in Unincorporated San Diego County (Location Framework) which is intended to apply to the subsequent projects that are County-owned, operated, financed, leased, and/or contracted Emergency Shelters or Housing Facilities. The Location Framework demonstrates the four-step review process the County will take, to identify, evaluate and potentially site facilities and services allowable under the zoning ordinance amendment. Additionally, the Location Framework includes a high-level internal process the

subsequent Emergency Shelters, and Housing Facilities would progress through when a future project is planned. This internal process does include steps for future CEQA analysis.

The project does not propose any development under this discretionary action. Future development or improvement of new or existing emergency shelter facilities would be required to conduct a subsequent environmental review prior to the authorization for individual project development. At the time a subsequent review is conducted, individual projects would be analyzed under CEQA for project-specific impacts and would apply GPU EIR mitigation measures, or other measures, as necessary. Subsequent projects would be required to utilize the County’s Guidelines for Determining Significance for Visual Resources as identified by GPU EIR mitigation measure AES-1.3. Subsequent projects would also be required to conform to the County’s General Plan policies such as Policy LU-6.9: Development Conformance with Topography, Policy COS-11.1: Protection of Scenic Resources, and Policy COS-11.3: Development Siting and Design. As identified by the GPU EIR, these policies would require development to conform to the natural topography to limit grading; require the protection of scenic highways, corridors, and regionally significant scenic vistas and natural features; as well as require development in visually sensitive areas to minimize visual impacts to preserve unique and special visual features.

Lastly, Emergency Shelters and Housing Facilities are not expected to cause any significant impacts to light or glare because future project lighting would be required to conform to the County’s Light Pollution Code as well as the County’s Guidelines for Determining Significance for Dark Skies and Glare as identified by the GPU EIR mitigation measures Aes-4.2.

Therefore, the project would not have a substantial adverse effect on visual resources that have not been adequately analyzed by the GPU EIR. Appropriate mitigation measures identified by the GPU EIR, or other measures, would be applied to subsequent projects, as necessary.

Because the project does not propose any development under this discretionary action, implementation of the project would not result in significant adverse effects on visual resources, and future development and improvement of emergency shelter facilities would be required to conduct subsequent CEQA review and apply GPU EIR mitigation measures or other measures as necessary, the project would not contribute to a cumulatively considerable effect on visual resources.

II. AGRICULTURE AND FORESTRY RESOURCES -- Since the previous EIR was certified or previous ND was adopted, are there any changes in the project, changes in circumstances under which the project is undertaken, and/or "new information of substantial importance" that cause one or more effects to agriculture or forestry resources including: conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agricultural use, conflicts with existing zoning for agricultural use or Williamson Act contract, or conversion of forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

YES

NO

Agricultural Resources

The GPU EIR identified impacts to conversion of agricultural resources, land use conflicts, and indirect conversion of agricultural resources as potentially significant. Land use conflicts were determined to be less than significant with mitigation; however, direct and indirect conversion of agricultural resources were determined to be significant and unavoidable.

The project could potentially impact agricultural resources for any new construction on undisturbed soils. However, Emergency Shelters and Housing Facilities would be located in areas to address homelessness and related public health, safety, and welfare issues. Agricultural resources are less likely to be located in such areas. In addition, the project does not propose any development under this discretionary action. Future development or improvement of new or existing Emergency Shelters and Housing Facilities would be required to conduct a subsequent environmental review prior to the authorization for individual project development. At the time a subsequent review is conducted, individual projects would be analyzed under CEQA for project-specific impacts and would apply GPU EIR mitigation measures, or other measures, as necessary. Subsequent projects would be required to conform to the County's Guidelines for Determining Significance for Agricultural Resources as identified by GPU EIR mitigation measure Agr-1.2. and apply project-specific mitigation, if necessary, such as PACE credits, as identified by GPU EIR mitigation measure Agr-1.4. Subsequent projects would also be required to conform to the County's General Plan Policies such as Policy COS-6.2: Protection of Agricultural Operations and Policy COS-6.4: Conservation Easements. As identified by the GPU EIR, these policies would require development to protect existing agricultural operations from the encroachment of incompatible land uses; and support the acquisition or voluntary dedication of agricultural conservation easements and programs that preserve agricultural lands.

Therefore, the project would not have a substantial adverse effect on agricultural resources that has not been adequately analyzed by the GPU EIR. Appropriate mitigation measures identified by the GPU EIR, or other measures, would be applied to subsequent projects, as necessary.

Because the project does not propose any development under this discretionary action, implementation of the project would not result in significant adverse effects on agricultural resources, and future development and improvement of emergency shelter facilities would be required to conduct subsequent CEQA review and apply GPU EIR mitigation measures or other measures as necessary, the project would not contribute to a cumulatively considerable effect on agricultural resources.

Forestry Resources

Forestry Resources were not specifically analyzed under the GPU EIR because Appendix G of the State CEQA Guidelines was amended to include significance criteria for forestry resources after the release of the Notice of Preparation for the GPU EIR.

The project could potentially impact forestry resources since it is unknown at this time if future project locations would contain forest lands as defined in Public Resources Code section 12220(g). However, the County of San Diego does not have any existing Timberland Production Zones, land zoned for timberland, or land zoned for forest lands.

The project does not propose any development under this discretionary action. Future development or improvement of new or existing Emergency Shelters and Housing Facilities would be required to conduct a subsequent environmental review prior to the authorization for individual project

development. At the time a subsequent review is conducted, individual projects would be analyzed under CEQA for project-specific impacts and apply appropriate mitigation, as necessary. In addition, subsequent projects would be required to conform to the County's General Plan Policies such as Policy LU-6.1: Environmental Sustainability and Policy LU-6.6 Integration of Natural Features into Project Design. These measures would require the protection of intact or sensitive natural resources for the long-term sustainability of the natural environment, and require the incorporation of natural features into proposed development to avoid sensitive environmental resources.

Therefore, the project would not have a substantial adverse effect on forestry resources. Because the project does not propose development under this discretionary action, implementation of the project would not result in significant adverse effects on agricultural resources, and future development and improvement of emergency shelter facilities would be required to conduct subsequent CEQA review, the project would not contribute to a cumulatively considerable effect on forestry resources.

III. AIR QUALITY -- Since the previous EIR was certified or previous ND was adopted, are there any changes in the project, changes in circumstances under which the project is undertaken, and/or "new information of substantial importance" that cause one or more effects to air quality including: conflicts with or obstruction of implementation of the San Diego Regional Air Quality Strategy (RAQS) or applicable portions of the State Implementation Plan (SIP); violation of any air quality standard or substantial contribution to an existing or projected air quality violation; a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard; exposure of sensitive receptors to substantial pollutant concentrations; or creation of objectionable odors affecting a substantial number of people?

YES

NO

The GPU EIR identified impacts to air quality plans and from objectionable odors as less than significant. Impacts from air quality violations, non-attainment criteria pollutants, and sensitive receptors were determined to be significant and unavoidable.

Project air quality emissions during construction would be sourced from worker vehicle trips as well as grading and construction equipment such as tractors, graders, excavators, and cranes. Project operational air quality emissions would likely be sourced from employee/volunteer vehicle trips to and from the facility as well as picking up persons experiencing homelessness to be brought to the facility. The project could potentially impact air quality since it is unknown at this time the vehicle trips associated with future Emergency Shelters and Housing Facilities or how many Emergency Shelters and Housing Facilities would be constructed concurrently. However, the Emergency Shelters and Housing Facilities are not expected to generate a significant number of trips due to the facilities likely operating as locally serving and persons experiencing homelessness not usually owning cars, and this project is not intended to increase car ownership within the population of persons experiencing homelessness. For the persons experiencing homelessness who do own cars and would park at the facilities, no changes to project trips are expected compared to baseline conditions. This is because future projects would be located in areas to address homelessness and related public health, safety, and welfare issues.

In addition, the project does not propose any development under this discretionary action. Future development or improvement of new or existing Emergency Shelters and Housing Facilities would be required to conduct a subsequent environmental review prior to the authorization for individual project development. At the time a subsequent review is conducted, individual projects would be analyzed under CEQA for project-specific impacts and would apply GPU EIR mitigation measures or other measures, as necessary. Subsequent projects would be required to conform to the County's Guidelines for Determining Significance for Air Quality, as identified by the GPU EIR mitigation measure Air-2.6. Subsequent projects would also be required to conform to the County's General Plan Policies such as COS-14.1: Land Use Development Form, COS-14.8: Minimize Air Pollution, and COS-14.10: Low-Emission Construction Vehicles and Equipment. As identified by the GPU EIR, these policies would require that development be located and designed to reduce vehicle trips; minimize land use conflicts that expose people to significant amounts of air pollutants, and require County contractors and encourage other developers to use low-emission construction vehicles and equipment to improve air quality and reduce GHG emissions.

Therefore, the project would not have a substantial adverse effect on air quality that has not been adequately analyzed by the GPU EIR. Appropriate mitigation measures identified by the GPU EIR or other measures would be applied to subsequent projects, as necessary.

Because the project does not propose any development under this discretionary action, implementation of the project would not result in significant adverse effects on air quality, and future development and improvement of emergency shelter facilities would be required to conduct subsequent CEQA review and apply GPU EIR mitigation measures or other measures as necessary, the project would not contribute to a cumulatively considerable effect on air quality.

IV. BIOLOGICAL RESOURCES -- Since the previous EIR was certified or previous ND was adopted, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to biological resources including: adverse effects on any sensitive natural community (including riparian habitat) or species identified as a candidate, sensitive, or special status species in a local or regional plan, policy, or regulation, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service; adverse effects to federally protected wetlands as defined by Section 404 of the Clean Water Act; interference with the movement of any native resident or migratory fish or wildlife species or with wildlife corridors, or impeding the use of native wildlife nursery sites; and/or conflicts with the provisions of any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, or other approved local, regional or state habitat conservation plan, policies or ordinances?

YES NO

The GPU EIR identified potentially significant impacts to special status species, riparian habitat, and other sensitive natural communities, federally protected wetlands, and wildlife movement corridors. Federally protected wetlands were found to be less than significant with mitigation; however, special status species, riparian habitat and other sensitive natural communities, and wildlife movement corridors were found to be significant and unavoidable. Local policies and ordinances, and habitat conservation plans, and natural community conservation plans, were determined to be less than significant.

The project could potentially impact biological resources for any new construction. Since we do not know the locations of future subsequent projects, assessment of specific biological resources impacts at this time is not possible. However, the project does not propose any development under this discretionary action. Future development or improvement of new or existing Emergency Shelters and Housing Facilities would be required to conduct a subsequent environmental review prior to the authorization for individual project development. At the time a subsequent review is conducted, individual projects would be analyzed under CEQA for project-specific impacts and would apply GPU EIR mitigation measures or other measures, as necessary. Subsequent projects would be required to conform to the County's Guidelines for Determining Significance for Biological Resources, as identified by GPU EIR mitigation measure Bio-1.5. Subsequent projects would also be required to conform to the County's General Plan Policies such as Policy COS-1.9: Invasive Species, Policy COS-2.2: Habitat Protection through Site Design, and Policy COS-3.1: Wetland Protection. As identified by the GPU EIR, these policies require new development adjacent to biological preserves to use non-invasive plants in landscaping; require development to be sited in the least biologically sensitive areas and minimize the loss of natural habitat through site design, and require development to preserve existing natural wetland areas and associated transitional riparian and upland buffers and retain opportunities for enhancement.

Therefore, the project would not have a substantial adverse effect on biological resources that have not been adequately analyzed by the GPU EIR. Appropriate mitigation measures identified by the GPU EIR or other measures would be applied to subsequent projects, as necessary.

Because the project does not propose any development under this discretionary action, implementation of the project would not result in significant adverse effects on air quality, and future development and improvement of emergency shelter facilities would be required to conduct subsequent CEQA review and apply GPU EIR mitigation measures as necessary, the project would not contribute to a cumulatively considerable effect on biological resources.

V. CULTURAL RESOURCES -- Since the previous EIR was certified or previous ND was adopted, are there any changes in the project, changes in circumstances under which the project is undertaken, and/or "new information of substantial importance" that cause one or more effects to cultural resources including: causing a change in the significance of a historical or archaeological resource as defined in State CEQA Guidelines Section 15064.5; destroying a unique paleontological resource or site or unique geologic feature; and/or disturbing any human remains, including those interred outside of formal cemeteries?

YES

NO

The GPU EIR identified potentially significant impacts to historical resources, archaeological resources, paleontological resources, and human resources. All issue topics were determined to be less than significant with mitigation.

The project could potentially impact cultural resources for any new construction or conversion of historic structures. However, the project does not propose any development under this discretionary action. Future development or improvement of new or existing Emergency Shelters and Housing Facilities would be required to conduct a subsequent environmental review prior to the authorization for individual project development. At the time a subsequent review is conducted, individual projects would be analyzed under CEQA for project-specific impacts and would apply GPU EIR mitigation

measures or other measures, as necessary. Subsequent projects would be required to conform to the County's Guidelines for Determining Significance for Cultural Resources and County's Guidelines for Determining Significance for Paleontological Resources, as identified by GPU EIR mitigation measure Cul-1.6 and Cul-3.2. Subsequent projects would also be required to conform to the County's General Plan Policies such as Policy COS-7.1: Archaeological Protection, Policy COS-7.3: Archaeological Collections, Policy COS-9.1: Preservation, and Policy COS-7.5: Treatment of Human Remains. As identified by the GPU EIR, these policies require the preservation and treatment of important archaeological resources or collections in a culturally appropriate manner; require the salvage and preservation of unique paleontological resources when exposed to the elements during excavation, grading activities, or other development processes; and require human remains be treated with utmost dignity and respect and that the disposition and handling of human remains will be done in consultation with the Most Likely Descendant and under the requirements of the Federal, State and County Regulations.

Therefore, the project would not have a substantial adverse effect on cultural resources that have not been adequately analyzed by the GPU EIR. Appropriate mitigation measures identified by the GPU EIR or other measures would be applied to subsequent projects, as necessary.

Because the project does not propose any development under this discretionary action, implementation of the project would not result in significant adverse effects on cultural resources, and future development and improvement of Emergency Shelters and Housing Facilities would be required to conduct subsequent CEQA review and apply GPU EIR mitigation measures or other measures as necessary, the project would not contribute to a cumulatively considerable effect on cultural resources.

VI. ENERGY USE – Since the previous EIR was certified or previous ND was adopted, are there any changes in the project, changes in circumstances under which the project is undertaken, and/or “new information of substantial importance” that result in one or more effects from energy including: wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation; and/or conflict with or obstruct a state or local plan for renewable energy or energy efficiently?

YES

NO

Energy use was not specifically analyzed within the GPU EIR as a separate issue area under CEQA. At the time, Energy Use was contained within Appendix F of the CEQA Guidelines and since then, has been moved to the issue areas within Appendix G of the CEQA Guidelines. However, the issue of energy use, in general, was discussed within the GPU and GPU EIR. For example, within the Conservation and Open Space Element of the GPU, Goal COS-15 promotes sustainable architecture and building techniques that reduce emissions of criteria pollutants and GHGs, while protecting public health and contributing to a more sustainable environment. Policies COS-15.1, COS-15.2, and COS-15.3 would support this goal by encouraging the design and construction of new buildings and upgrades of existing buildings to maximize energy efficiency and reduce GHG. Goal COS-17 promotes sustainable solid waste management. Policies COS-17.1 and COS-17.5

would support this goal by reducing GHG emissions through waste reduction techniques and methane recapture.

The project would increase the demand for electricity and potentially natural gas at future project sites, and gasoline consumption at the project site during construction and operation. CEQA requires mitigation measures to reduce “wasteful, inefficient and unnecessary” energy usage (Public Resources Code Section 21100, subdivision [b][3]). Neither the law nor the State CEQA Guidelines establish criteria that define wasteful, inefficient, or unnecessary use. Compliance with the California Code of Regulations 2019 Title 24 Part 6 Building Code would result in highly energy-efficient buildings. However, compliance with building codes does not adequately address all potential energy impacts during construction and operation.

Grading and Construction

During the grading and construction phases of future projects, the primary energy source utilized would be petroleum from construction equipment and vehicle trips. To a lesser extent, electricity would also be consumed for the temporary electric power for as-necessary lighting and electric equipment. Activities including electricity would be temporary and negligible; therefore, electricity use during grading and construction would not result in wasteful, inefficient, or unnecessary consumption of energy. In addition, natural gas is not anticipated to be required during the construction of future subsequent projects. Any minor amounts of natural gas that may be consumed as a result of project construction would be temporary and negligible and would not have an adverse effect; therefore, natural gas used during grading and construction would also not result in inefficient, or unnecessary consumption of energy.

The electricity needed for the project grading and construction would be temporary and is not anticipated to require additional capacity or increase peak or base period demands for electricity or other forms of energy. Future subsequent projects would rely on petroleum consumption throughout the grading as well as the construction phases. Fuel consumed by construction equipment would be the primary energy resource expended over the course of grading and construction. Vehicle trips associated with the transportation of construction materials and construction workers' commutes would also result in petroleum consumption but to a lesser extent. Petroleum consumptions would be necessary for the operation and maintenance of construction equipment and would not be beyond what is necessary for future subsequent projects. In addition, projects would be required to conform to General Plan Policy COS-14.10: Low-Emission Construction Vehicles and Equipment. As identified by the GPU EIR, this policy would require County contractors and encourage other developers to use low-emission construction vehicles and equipment to improve air quality and reduce GHG emissions.

Future subsequent projects would also be required to comply with the Construction and Demolition Materials Diversion Ordinance (Sections 68.511 through 68.518 of the County Code of Regulatory Ordinances). The ordinance requires that 90% of inert material (concrete, asphalt, dirt, etc.) and 65% of all other materials must be recycled from the project. The ordinance also requires projects to recycle or reuse 100% of excavated soils, trees, stumps, rocks, and vegetation. In order to comply with the ordinance, proponents must submit a Debris Management Plan and a fully refundable Performance Guarantee prior to building permit issuance. This ultimately will result in less energy use overall as the demolished materials will be reused after recycling.

Due to the aforementioned factors, the project's energy consumption during grading and construction would not be considered wasteful, inefficient, or unnecessary.

Operational

Operation of future subsequent projects would be typical of civic use types, if not less, requiring natural gas for space and water heating and potential landscape maintenance activities, if required. The Health and Safety Code Section 50801(e) defines Emergency Shelters as "housing with minimal supportive services for homeless persons that are limited to occupancy of six months or less by a homeless person." Indirect energy use would include wastewater treatment and solid waste removal at offsite facilities.

As per the stipulations within the changes to the Zoning Ordinance, Emergency Shelters and Housing Facilities would be located in areas to address homelessness and related public health, safety, and welfare issues, reducing the amount of employee/volunteer trips required. In addition, over time the fuel efficiency of vehicles is expected to increase as older vehicles are replaced with newer, more efficient models throughout the lifetime of the subsequent projects. As such, the amount of petroleum consumed as a result of vehicle trips to and from the project site during operation would decrease over time. State and Federal regulations regarding standards for vehicles (e.g. Advanced Clean Cars Program, CAFÉ Standards) are designed to reduce wasteful, unnecessary, and inefficient use of fuel. The coupling of various State policies and regulations such as the Zero-Emissions Vehicles Mandate and Senate Bill 350 would result in the deployment of electric vehicles which would be powered by an increasingly renewable electrical grid. These actions would reduce energy use compared to other similar projects.

Subsequent projects would likely use electricity for the site and employee parking lot lighting. Subsequent projects would be required to meet Title 24 of the California Building Code, which establishes energy efficiency standards for buildings to reduce energy demand and consumption. In addition, future subsequent projects would be required to meet CALGreen Standards such as carpool and vanpool-only parking spaces, and electric vehicle-only parking. Subsequent projects would also be required to conform to the County's General Plan policies discussed at the beginning of Energy Use.

Due to the aforementioned factors, the project's energy consumption during grading and construction would not be considered wasteful, inefficient, or unnecessary.

The County of San Diego has presented the Framework for Siting Emergency Shelters, Transitional and Supportive Housing, or Homeless Services in Unincorporated San Diego County (Location Framework) which is intended to apply to the subsequent projects that are County-owned, operated, financed, leased, and/or contracted Emergency Shelters or Housing Facilities. The Location Framework demonstrates the four-step review process the County will take, to identify, evaluate and potentially site facilities and services allowable under the zoning ordinance amendment. Of which Vehicle Miles Traveled is a criterion the County will review when identifying potential future sites. Additionally, the Location Framework includes a high-level internal process the subsequent Emergency Shelters, and Housing Facilities would progress through when a future project is planned. This internal process does include steps for future CEQA analysis.

Therefore, the project would not have a substantial adverse effect on energy use that has not been adequately analyzed by the GPU EIR. Because the project does not propose any development

under this discretionary action, implementation of the project would not result in significant adverse effects on energy use, and future development and improvement of County-owned emergency shelter facilities would be required to conduct subsequent CEQA, the project would not contribute to a cumulatively considerable effect on energy use.

VII. GEOLOGY AND SOILS -- Since the previous EIR was certified or previous ND was adopted, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in one or more effects from geology and soils including: exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, seismic-related ground failure, including liquefaction, strong seismic ground shaking, or landslides; result in substantial soil erosion or the loss of topsoil; produce unstable geological conditions that will result in adverse impacts resulting from landslides, lateral spreading, subsidence, liquefaction or collapse; being located on expansive soil creating substantial risks to life or property; and/or having soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

YES

NO

The GPU EIR identified impacts to exposure to seismic-related hazards, soil erosion or topsoil loss, soil stability, expansive soils, wastewater disposal systems, and unique geologic features as less than significant. No mitigation was required.

No development is proposed under this discretionary action as part of the project. Future subsequent projects could be hindered by a range of site development encumbrances such as a location near an earthquake fault, located on unstable geological unit or soil, or located on expansive soils. However, future subsequent projects would be required to conform to the Seismic Requirements outlines within the California Building Code of Regulations, Title 24. In addition, the San Diego County Code Section 87.101 requires a soil compaction report with proposed foundation recommendation would be required to be approved before the approval of subsequent projects.

To reduce potential losses of topsoil, projects would also need to prepare Storm Water Pollution Prevention Plans (SWPPP) and Storm Water Quality Management Plans (SWQMP) for both construction and post-construction phases. The SWPPP would be required to be prepared in accordance with order No. 2009-009-DWQ, National Pollutant Discharge Elimination System (NPDES) order CAS000002 Construction General Permit (CGP) adopted by the State Water Resources Control Board (SWRCB) on September 9, 2009, or the most recent version adopted. The SWQMP would be required to be prepared in accordance with the County of San Diego BMP Design Manual (2019) and San Diego County Regional Water Quality Control Board (SDRWQCB) Order No. R9-2013-0001 Municipal Separate Storm Sewer System (MS4) permit (2013), as adopted by the RWQCB on May 8, 2013, or the most recent version adopted. The SWPPP and SWQMP specify and describe the implementation process of all Best Management Practices (BMPs) that would address equipment operation and materials management, prevent the erosion process from occurring, and prevent sedimentation in any onsite and downstream receiving waters. County staff would ensure that these plans are implemented as required. Moreover, future subsequent projects would be required to comply with the San Diego County Code of Regulations, Title 8, Zoning and Land Use Regulations, Division 7, Sections 87.414 and 87.417 for Drainage, Erosion Prevention, and planting. Compliance with these regulations minimizes the potential for water and wind erosion.

Therefore, compliance with County, State, and Federal requirements and regulations would ensure the project would not have a substantial adverse effect from geology and soils (i.e. strong seismic ground shaking, liquefaction, unstable geological unit or soil, or expansive soils).

Because the project does not propose any development under this discretionary action, implementation of the project would not result in significant adverse effects from geology and soils, and future development and improvement of County-owned Emergency Shelters and Housing Facilities would be required to conduct subsequent CEQA review, including soils compaction reports, SWPPPs, and SWQMPs, the project would not contribute to a cumulatively considerable effect from geology and soils.

VIII. GREENHOUSE GAS EMISSIONS -- Since the previous EIR was certified or previous ND was adopted, are there any changes in the project, changes in circumstances under which the project is undertaken, and/or "new information of substantial importance" that result in one or more effects related to environmental effects associated with greenhouse gas emissions or compliance with applicable plans, policies or regulations adopted for the purpose of reducing greenhouse gas emissions?

YES

NO

The GPU EIR identified compliance with AB 32 and the potential effects of global climate change as potentially significant. Both issue topics were found to have a less than significant impact with mitigation but were found to have a significant cumulative contribution.

For background, in February 2018, the County Board of Supervisors adopted the County of San Diego Climate Action Plan (CAP) that included strategies and measures to reduce GHG emissions from the unincorporated County and County government operations. These strategies and measures were developed to reduce GHG emissions by 2020 and 2030, in line with the State’s legislative GHG reduction targets through AB 32 and SB 32, and demonstrate progress toward the State’s 2050 GHG reduction goal. In December 2018, because of a lawsuit filed against the County and the CAP, the San Diego County Superior Court issued a writ ordering the approval of the CAP and associated SEIR be set aside. In June 2020, this decision was upheld by the California Court of Appeal, Fourth District following the County’s appeal of the San Diego County Superior Court decision, and the County Board of Supervisors subsequently rescinded approvals of the CAP, SEIR, and related approvals in September 2020. Through the holding of this decision, the County’s CAP can no longer be considered the applicable plan in the unincorporated County for the purpose of reducing GHG emissions, and consistency with the CAP cannot be used as a determination of significance until such a time as it is reapproved in compliance with CEQA. However, GHG reduction strategies and measures included in the CAP continue to be implemented pending the preparation of an updated CAP for consideration by the County Board of Supervisors.

Until such time that a Climate Action Plan is adopted by the County, subsequent projects implemented would be required to comply with applicable GPU mitigation measures. This includes GPU mitigation measures CC-1.7, which states to incorporate the recommendations of the California Air Resources Board (CARB) related to climate change. Though CARB has not released a threshold of significance, CARB developed a 2017 Scoping Plan, which is intended

to reduce GHG emissions to meet the statewide targets set forth in AB 32 and SB 32 and provides examples of local actions that can be implemented to support the State's climate goals.

No project development is proposed under this discretionary action. However, it is reasonably foreseeable that the approval of the project could lead to the future development of homeless shelters, which would result in GHG emissions due to construction activities and operational aspects of the project (building energy use, employee/volunteer vehicle trips). However, Emergency Shelters and Housing Facilities would be located in areas to address homelessness and related public health, safety, and welfare issues, thereby reducing the trips required. In addition, future development or improvement of new or existing emergency shelter facilities would be required to conduct a subsequent environmental review prior to authorization for individual project development. At the time a subsequent review is conducted, individual projects would be analyzed under CEQA for project-specific impacts and would apply GPU EIR mitigation measures, as necessary. Several mitigation measures were identified by the GPU EIR, including CC-1.1, CC-1.5, CC-1.10, and CC-1.11, which encourages incentives for energy-efficient development, coordination with the San Diego County Water Authority and other water agencies, and implementation of the Ordinance Relating to Water Conservation for Landscaping. Although no development is proposed currently, these requirements, and other GPU EIR mitigation measures or other measures, would be implemented as feasible for future subsequent projects until such time a CAP is adopted by the County.

Therefore, the project would not have a substantial adverse effect on greenhouse gas emissions that has not been adequately analyzed by the GPU EIR. Appropriate mitigation measures identified by the GPU EIR or other measures would be applied to subsequent projects, as necessary.

Because the project does not propose development under this discretionary action, implementation of the project would not result in significant adverse effects on climate change, and future development and improvement of County-owned emergency shelter facilities would be required to conduct subsequent CEQA review and apply GPU EIR mitigation measures or other measures as necessary, the project would not contribute to a cumulatively considerable effect on greenhouse gas emissions.

IX. HAZARDS AND HAZARDOUS MATERIALS -- Since the previous EIR was certified or previous ND was adopted, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in one or more effects from hazards and hazardous materials including: creation of a significant hazard to the public or the environment through the routine transport, storage, use, or disposal of hazardous materials or wastes; creation of a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment; production of hazardous emissions or handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school; location on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 creating a hazard to the public or the environment; location within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport; within the vicinity of a private airstrip resulting in a safety hazard for people residing or working in the project area; impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; and/or exposure of

people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

YES

NO

The GPU EIR identified potentially significant impacts to public airports, private airports, emergency response and evacuation plans, and wildland fires. Public airports, private airports, and emergency response and evacuation plans were determined to result in less than significant impacts with mitigation. Wildland fires were found to have a significant and unavoidable impact. Transport, use, and disposal of hazardous materials, accidental release of hazardous materials, hazards to schools, existing hazardous materials sites, and vectors, were all found to have less than significant impacts with no mitigation.

Future subsequent projects would not create a significant hazard to the public, including schools, or the environment, because projects would not involve the storage, use, transport, emission, or disposal of hazardous substances. Because the project does not involve development under this discretionary action, an analysis of listed hazardous materials sites cannot be completed at this time. However, if a subsequent project site is located on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 or is otherwise known to have been subject to a release of hazardous substances, the applicant would be required to obtain valid permits or certifications from the County Department of Environmental Health and Quality prior to any project development. As part of this process, soil testing and remediation would be required if hazardous substances have been identified onsite.

Similar to hazardous materials sites, analysis of specific site airport safety cannot be determined at this time. Future subsequent projects could be located in the vicinity of a private or public airport or airstrip. However, future subsequent projects would be required to comply with the County of San Diego Guidelines for Determining Significance for Airport Hazards as well as Airport Land Use Compatibility Plans, as identified by GPU EIR mitigation measures Haz-1.1 and Haz-1.3. Subsequent projects would also be required to conform to the County's General Plan Policies such as Policy S-15.1: Land Use Compatibility and Policy S-15.3: Hazardous Obstructions within Airport Approach and Departure. These policies would require land uses surrounding airports to be compatible with the operation of each airport and would restrict the development of potentially hazardous obstructions or other hazards to flight from being located within airport approach areas, airport departure areas, or known flight pattern areas. Future project structures are also not expected to reach a significant height in elevation (i.e., 200 feet) that would cause an airport hazard concern.

The County has several implementation plans in regards to hazards: Operational Area Emergency Plan, Multi-Jurisdictional Hazard Mitigation Plan, San Diego County Nuclear Power Station Emergency Response Plan, Oil Spill Contingency Element, Emergency Water Contingencies Annex, and Energy Shortage Response Plan, and Dam Evacuation Plan. The project would not interfere with the aforementioned plans because it would not prohibit subsequent plans from being established or prevent the goals and objectives of existing plans from being carried out. In addition, future subsequent projects would be required to conform to said hazard plans and would be analyzed under CEQA for project specific impacts.

The majority of the unincorporated County of San Diego is located within a high or very high fire hazard severity zone. Because of this, several fire standards and regulations have been established that are enforced per each individual project. Future subsequent projects would be required to comply with the regulations relating to emergency access, fuel modification, and water supply, as specified in the Consolidated Fire code. In addition, Fire Service Availability Letters are required prior to project approval as a standard project condition of approval. These letters are standard forms that are required to be filled out and signed by the fire authority operating in the project area and include information such as the closest fire station, and the estimated travel time for the fire authority to reach the project site. This estimated travel time is required to meet the travel response time indicated by the General Plan Safety Element.

The project would not cause current or future residents' exposure to vectors, including mosquitos, rats, or flies. Future subsequent projects would not involve, or support uses that would allow water to stand for a period of 72 hours or more (i.e. artificial lakes, agricultural ponds). Future projects would also not involve, or support uses that would produce or collect animal waste, such as equestrian facilities or agricultural operations.

Therefore, the project would not have a substantial adverse effect from hazards or hazardous materials that has not been adequately analyzed by the GPU EIR. Appropriate mitigation measures identified by the GPU EIR or other measures would be applied to subsequent projects, as necessary.

Because the project does not propose any development under this discretionary action, implementation of the project would not result in significant adverse effects related to hazardous materials and future development and improvement of County-owned emergency shelter facilities would be required to conduct subsequent CEQA review and apply GPU EIR mitigation measures or other measures as necessary, the project would not contribute to a cumulatively considerable effect from hazards or hazardous materials.

X. HYDROLOGY AND WATER QUALITY -- Since the previous EIR was certified or previous ND was adopted, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to hydrology and water quality including: violation of any waste discharge requirements; an increase in any listed pollutant to an impaired water body listed under section 303(d) of the Clean Water Act ; cause or contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses; substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level; substantially alter the existing drainage pattern of the site or area in a manner which would result in substantial erosion, siltation or flooding on- or off-site; create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems; provide substantial additional sources of polluted runoff; place housing or other structures which would impede or redirect flood flows within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map, including County Floodplain Maps; expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam; and/or inundation by seiche, tsunami, or mudflow?

YES

NO

The GPU EIR identified potentially significant impacts to the following issue topics: water quality standards and requirements; groundwater supplies and recharge; erosion or siltation; flooding; exceed the capacity of stormwater systems; housing within a 100-year flood hazard area; impeding or redirecting flood flows; dam inundation and flood hazards; and seiche, tsunami and mudflow hazards. All issue topics were found to be less than significant with mitigation with the exception of water quality standards and requirements, and groundwater supplies and recharge, which were found significant and unavoidable.

Future projects would likely not be located on groundwater-dependent lots or interfere with groundwater supplies and recharge. The Emergency Shelters and Housing Facilities would be located in areas to address homelessness and related public health, safety, and welfare issues. Based on this, it is unlikely the location would be groundwater dependent. However, in the unlikely event that future subsequent project sites are groundwater dependent, the future development or improvement of new or existing emergency shelter facilities would be required to conduct a subsequent environmental review prior to the authorization for individual project development. At the time a subsequent review is conducted, individual projects would be analyzed under CEQA for project-specific impacts and would apply GPU EIR mitigation measures, or other measures, as necessary. Subsequent projects would be required to conform to the County's Guidelines for Determining Significance for Groundwater as identified by GPU EIR mitigation measure Hyd-1.5. In addition, Subsequent projects would also be required to conform to the County's General Plan Policies such as Policy LU-8.2: Groundwater Resources, Policy LU-13.1: Adequacy of Water Supply, and Policy LU-13.2: Commitment of Water Supply. As identified by the GPU EIR, these policies would prohibit new development from exacerbating overdraft conditions, evaluate new groundwater-dependent development to assure a sustainable long-term supply of groundwater is available, coordinate water infrastructure planning with land use planning to maintain an acceptable availability of a high quality sustainable water supply, and require new development to identify adequate water resources in accordance with State law to support the development prior to project approval.

Future subsequent projects would not result in water quality impacts or increased erosion or siltation impacts beyond the GPU EIR analysis. As stated under VII. Geology and Soils, SWPPPs, and SWQMPs would be required to be prepared for both construction and post-construction phases. The SWPPP would implement the following typical erosion control BMPs: hydraulic stabilization and hydroseeding on disturbed slopes; County Standard lot perimeter protection detail and County Standard desilting basin for erosion control on disturbed flat areas; energy dissipater outlet protection for water velocity control; silt fencing, fiber rolls, gravel and sand bags, storm drain inlet protection and engineering desilting basin for sediment control; stabilized construction entrance, street sweeping and vacuuming for offsite tracking of sediment; and measures to control materials management and wastewater management. The purpose of the SWPPP is to prevent erosion and storm water pollution from entering downstream receiving water bodies. The SWQMP is enforced during the post-construction phase and requires projects to implement site design, source control, and structural BMPs to prevent potential pollutants from entering storm water runoff during project operations. Subsequent projects would also be required to conform to the County's Guidelines for Determining Significance for Water Quality (Water Quality Guidelines), Resource Protection Ordinance (RPO), and the Grading, Clearing and Watercourses Ordinance (Grading Ordinance) as identified by GPU EIR mitigation measures Hyd-1.5, Hyd-3.2, and Hyd-3.3. Future subsequent project conformance to the Water Quality Guidelines, RPO, Grading Ordinance, and waste

discharge requirements for both CGP and MS4 storm water permits, as discussed in VII Geology and Soils and expanded here, ensures projects would not create significant water quality impacts.

Future subsequent projects have the potential to exceed the capacity of stormwater systems. However, a subsequent environmental review would be required prior to authorization of individual project development. At the time a subsequent review is conducted, individual projects would be analyzed under CEQA for project-specific impacts and would apply GPU EIR mitigation measures, as necessary. Subsequent projects would be required to conform to the County's Guidelines for Determining Significance for Hydrology (Hydrology Guidelines) as identified by GPU EIR mitigation measure Hyd-1.5. Subsequent projects would also be required to conform to the County's General Plan Policies such as Policy S-10.5 which requires development to provide necessary on-site and off-site improvements to stormwater runoff and drainage facilities.

The County contains numerous flood areas that have been mapped by the County or the Federal Emergency Management Act (FEMA). Future subsequent projects could potentially be proposed in these locations. However, because a subsequent environmental review would be required prior to authorization of individual project development, future projects would be analyzed under CEQA for project-specific impacts and would apply GPU EIR mitigation measures, or other measures, as necessary. Subsequent projects would be required to conform to the Hydrology Guidelines as identified by the GPU EIR mitigation measure Hyd-1.5. Subsequent projects would also be required to conform to the County's General Plan Policies such as Policy COS-5.1: Impact to Floodways and Floodplains and Policy S-9.3: Development in Flood Hazard Areas. As identified by the GPU EIR, these policies restrict development in floodways and floodplains in accordance with policies in the Flood Hazards section of the Safety Element and requires development within mapped flood hazard areas to be sited and designed to minimize on-site and off-site hazards to health, safety, and property due to flooding.

Future subsequent projects could potentially be impacted by seiche, tsunami, mudflow, and dam inundation hazards. However, seiches are a rare occurrence, and tsunamis are not common in the unincorporated County of San Diego because the majority of the County is located inland. Mudflows are more common in areas that have been affected by extreme wildfire events in the recent past. Projects located within the Dam Inundation Zone would be required to conform to the Dam Evacuation Plan if flooding were to occur. However, subsequent environment review is required prior to authorization for individual project development. At the time a subsequent review is conducted, individual projects would be analyzed under CEQA for project-specific impacts and would apply GPU EIR mitigation measures, as necessary. Subsequent projects would be required to conform to the County's Guidelines for Determining Significance for Emergency Response Plans, as identified by GPU EIR mitigation measure Hyd-8.2. Subsequent projects would also be required to conform to the County's General Plan Policies such as Policy S-9.6: Development in Dam Inundation Areas. This policy prohibits development in dam inundation areas that may interfere with the County's emergency response and evacuation plans.

Therefore, the project would not have a substantial adverse effect on hydrology and water quality that has not been adequately analyzed by the GPU EIR. Appropriate mitigation measures identified by the GPU EIR, or other measures, would be applied to subsequent projects, as necessary.

Because the project does not propose any development under this discretionary action, implementation of the project would not result in significant adverse effects to hydrology or water

quality, and future development and improvement of County-owned emergency shelter facilities would be required to conduct subsequent CEQA review and apply GPU EIR mitigation measures or other measures as necessary, the project would not contribute to a cumulatively considerable effect to hydrology and water quality.

XI. LAND USE AND PLANNING -- Since the previous EIR was certified or previous ND was adopted, are there any changes in the project, changes in circumstances under which the project is undertaken, and/or "new information of substantial importance" that cause one or more effects to land use and planning including: physically dividing an established community; and/or conflicts with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect?

YES

NO

The GPU EIR identified potentially significant impacts related to the physical division of an established community, which were found to be less than significant with the incorporation of mitigation measures. The GPU EIR also analyzed impacts related to conflicts with land use plans, policies, and regulations, as well as conflicts with Habitat Conservation Plans (HCPs) and Natural Community Conservation Planning (NCCPs) and were found to be less than significant.

The Zoning Ordinance Amendments relating to Emergency Shelters and Housing Facilities would amend the County of San Diego Zoning Ordinance to exempt the development, use, or improvement of new or existing County-owned, operated, financed, leased, and/or contracted Emergency Shelters, Transitional, and Supportive Housing (Housing Facilities) from Zoning Ordinance provisions (project). The project would also expand the definition of "Emergency Shelter" to include 1) safety parking facilities that are not an RV park or mobile home park, 2) safe storage facilities, 3) safe camping facilities receiving direct financial assistance from the County of San Diego, State of California, or the Federal Government, and 4) day shelter facilities.

The project does not intend to re-locate persons experiencing homelessness away from the general communities of homeless gatherings or to areas that do not provide necessary services to assist persons experiencing homelessness. Rather, the proposed facilities would be integrated within communities and located in areas to address homelessness and related public health, safety, and welfare issues to provide centralized safety facilities for the shelter of persons experiencing homelessness.

The project would expand the methods for providing services to persons experiencing homelessness beyond traditional shelters by amending requirements within the Zoning Ordinance for consistency with the physical requirements of some of the alternatives to traditional shelters. The project would be consistent with Senate Bill 1138 by identifying zones and zoning designations to allow for emergency shelters in residential zones on County-owned, operated, and leased lands, as well as Assembly Bill 2553, which exempts Emergency Shelters that are constructed or allowed pursuant to the shelter crisis declarations from the Recreational Vehicle Park Occupancy Law.

While the project would make minor amendments and clarifications to Zoning Ordinance provisions, it would not conflict with land use plans, policies, and regulations established for the purpose of protecting environmental resources.

In addition, the project does not propose any development under this discretionary action. Future development or improvement of new or existing County-owned Emergency Shelters and Housing Facilities would be required to conduct a subsequent environmental review prior to the authorization for individual project development. At the time a subsequent review is conducted, individual projects would be analyzed under CEQA for project-specific impacts and would apply GPU EIR mitigation measures, or other measures, as necessary. The project would not result in any significant impacts related to land use and planning beyond what was previously analyzed within the GPU EIR.

Because the project does not propose any development under this discretionary action, implementation of the project would not result in significant adverse effects on land use and planning, and future development and improvement of County-owned Emergency Shelters and Housing Facilities would be required to conduct subsequent CEQA review and apply GPU EIR mitigation measures or other measures as necessary, the project would not contribute to a cumulatively considerable effect on land use and planning.

XII. MINERAL RESOURCES -- Since the previous EIR was certified or previous ND was adopted, are there any changes in the project, changes in circumstances under which the project is undertaken, and/or "new information of substantial importance" that cause one or more effects to mineral resources including: the loss of availability of a known mineral resource that would be of value to the region and the residents of the state; and/or loss of locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

YES

NO

The GPU EIR identified significant and unavoidable impacts related to mineral resource availability and mineral resource recovery sites.

The Zoning Ordinance Amendments relating to Emergency Shelters and Housing Facilities project would amend the County of San Diego Zoning Ordinance to exempt the development, use, or improvement of new or existing County-owned, operated, financed, leased, and/or contracted Emergency Shelters, Transitional, and Supportive Housing (Housing Facilities) from Zoning Ordinance provisions (project). The project would also expand the definition of "Emergency Shelter" to include 1) safety parking facilities that are not an RV park or mobile home park, 2) safe storage facilities, 3) safe camping facilities receiving direct financial assistance from the County of San Diego, State of California, or the Federal Government, and 4) day shelter facilities.

Future Emergency Shelters would be located in areas to address homelessness and related public health, safety, and welfare issues. The project does not intend to re-locate persons experiencing homelessness away from the general communities of homeless gatherings or to areas that do not provide necessary services to assist persons experiencing homelessness. The County of San Diego has presented the Framework for Siting Emergency Shelters, Transitional and Supportive Housing, or Homeless Services in Unincorporated San Diego County (Location Framework) which is intended to apply to the subsequent projects that are County-owned, operated, financed, leased, and/or contracted Emergency Shelters or Housing Facilities. The Location

Framework demonstrates the four-step review process the County will take, to identify, evaluate and potentially site facilities and services allowable under the zoning ordinance amendment. Additionally, the Location Framework includes a high-level internal process the subsequent Emergency Shelters, and Housing Facilities would progress through when a future project is planned. This internal process does include steps for future CEQA analysis. At the time of the future project impacts related to mineral resource availability and mineral resource recovery, sites will be analyzed.

Therefore, implementation of the project is not expected to result in the loss of availability of a known mineral resource that would be of value since these land uses have already been lost due to incompatible land uses.

In addition, the project does not propose any development under this discretionary action. Future development or improvement of new or existing County-owned emergency shelter facilities would be required to conduct a subsequent environmental review prior to the authorization for individual project development. At the time a subsequent review is conducted, individual projects would be analyzed under CEQA for project-specific impacts and would apply GPU EIR mitigation measures, or other measures, as necessary. The project would not result in any significant impacts related to mineral resources beyond what was previously analyzed within the GPU EIR.

Because the project does not propose any development under this discretionary action, implementation of the project would not result in significant adverse effects on mineral resources, and future development and improvement of County-owned emergency shelter facilities would be required to conduct subsequent CEQA review and apply GPU EIR mitigation measures or other measures as necessary, the project would not contribute to a cumulatively considerable effect on mineral resources.

XIII. NOISE -- Since the previous EIR was certified or previous ND was adopted, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in one or more effects from noise including: exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies; exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels; a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project; a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project; for projects located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, or for projects within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

YES

NO

The GPU EIR identified potentially significant impacts related to excessive noise levels, excessive groundborne vibration, permanent and temporary increases in ambient noise levels, and excessive noise exposure from a public or private airport. All impacts were determined to be less than significant with mitigation with the exception of impacts related to permanent increases in ambient noise levels, which remained significant and unavoidable.

The Zoning Ordinance Amendments relating to Emergency Shelters and Housing Facilities project would amend the County of San Diego Zoning Ordinance to exempt the development, use, or improvement of new or existing County-owned, operated, financed, leased, and/or contracted Emergency Shelters, Transitional, and Supportive Housing (Housing Facilities) from Zoning Ordinance provisions (project). The project would also expand the definition of "Emergency Shelter" to include 1) safety parking facilities that are not an RV park or mobile home park, 2) safe storage facilities, 3) safe camping facilities receiving direct financial assistance from the County of San Diego, State of California, or the Federal Government, and 4) day shelter facilities.

Typical noise-related adverse effects associated with new development projects generally fall into three categories: construction noise, operational noise, and exposure of noise-sensitive land use (NSLUs) to existing and future noise from all sources. The project would be required to comply with the General Plan – Noise Element and County of San Diego Noise Ordinance.

The project has the potential to result in impacts related to noise for grading and construction for homeless shelters, as well as potential increases related to operational noise due to higher concentrations of outdoor human activity in designated shelter locations such as parking and camping facilities.

The project does not propose any development under this discretionary action. Future development or improvement of new or existing County-owned Emergency Shelters and Housing Facilities would be required to conduct a subsequent environmental review prior to the authorization for individual project development. At the time a subsequent review is conducted, individual projects would be analyzed under CEQA for project-specific impacts and would apply GPU EIR mitigation measures, as necessary. Subsequent projects would be required to conform to the County's Guidelines for Determining Significance for Noise, as identified by the GPU EIR mitigation measure Noi-1.1. If potential noise impacts could occur, subsequent projects would be required to submit an acoustical analysis also identified by GPU EIR mitigation measure Noi-1.1. Subsequent projects would also be required to conform to the County's General Plan Policies such as Policy LU-2.8: Mitigation of Development Impacts and Policy N-2.1: Development Impacts to Noise Sensitive Land Uses. As identified by the GPU EIR, these policies would require projects to minimize significant impacts to surrounding areas from uses or operations that cause excessive noise or vibrations and would require an acoustical study where development may exceed thresholds and require mitigation for sensitive uses in compliance with the noise standards listed in Table N-2 in the Noise Element.

Therefore, the project would not have a substantial adverse effect on noise that has not been adequately analyzed by the GPU EIR. Appropriate mitigation measures identified by the GPU EIR would be carried forward to subsequent projects, as necessary.

Because the project does not propose any development under this discretionary action, implementation of the project would not result in significant adverse effects on noise, and future development and improvement of County-owned Emergency Shelters and Housing Facilities would be required to conduct subsequent CEQA review and apply GPU EIR mitigation measures as necessary, the project would not contribute to a cumulatively considerable effect on noise.

XIV. POPULATION AND HOUSING -- Since the previous EIR was certified or previous ND was adopted, are there any changes in the project, changes in circumstances under which the project is undertaken, and/or "new information of substantial importance" that result in one or more effects to

population and housing including displacing substantial numbers of existing housing or people, necessitating the construction of replacement housing elsewhere?

YES

NO

The GPU EIR found less than significant impacts related to population and housing, including population growth, displacement of housing, and displacement of people.

The Zoning Ordinance Amendments relating Emergency Shelters and Housing Facilities project would amend the County of San Diego Zoning Ordinance to exempt the development, use, or improvement of new or existing County-owned, operated, financed, leased, and/or contracted Emergency Shelters, Transitional, and Supportive Housing (Housing Facilities) from Zoning Ordinance provisions (project). The project would also expand the definition of “Emergency Shelter” to include 1) safety parking facilities that are not an RV park or mobile home park, 2) safe storage facilities, 3) safe camping facilities receiving direct financial assistance from the County of San Diego, State of California, or the Federal Government, and 4) day shelter facilities.

The project would create additional Emergency Shelters and Housing Facilities for persons experiencing homelessness. However, the intent of the project is to locate Emergency Shelters and Housing Facilities in areas to address homelessness and related public health, safety, and welfare issues which will not create more persons experiencing homelessness, thus inducing unplanned population growth. The project would provide shelters and housing for already existing populations of persons experiencing homelessness and would provide a continuum of care for persons experiencing homelessness. Likewise, the project would not displace any existing people or housing necessitating the construction of replacement housing elsewhere, because the project would allow for the construction of homeless shelters in areas to address homelessness and related public health, safety, and welfare issues. Future subsequent projects would provide shelter for the existing persons experiencing homelessness in locations with access to basic services.

In addition, the project does not propose any development under this discretionary action. Future development or improvement of new or existing County-owned Emergency Shelters and Housing Facilities would be required to conduct a subsequent environmental review prior to the authorization for individual project development. At the time a subsequent review is conducted, individual projects would be analyzed under CEQA for project-specific impacts and would apply GPU EIR mitigation measures, or other measures, as necessary. In addition, subsequent projects would also be required to conform to the County’s General Plan Policies such as Policy LU-9.4, which prioritizes infrastructure improvements and the provisions of public facilities for villages and community cores consistent with the intensity of development allowed by the General Plan. Therefore, the project would not have a substantial adverse effect on population and housing that has not been adequately analyzed by the GPU EIR.

Because the project does not propose any development under this discretionary action, implementation of the project would not result in significant adverse effects on population and housing, and future development and improvement of County-owned Emergency Shelters and Housing Facilities would be required to conduct subsequent CEQA review and apply GPU EIR mitigation measures or other measures as necessary, the project would not contribute to a cumulatively considerable effect on population and housing.

XV. PUBLIC SERVICES -- Since the previous EIR was certified or previous ND was adopted, are there any changes in the project, changes in circumstances under which the project is undertaken, and/or "new information of substantial importance" that result in one or more substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services: fire protection, police protection, schools, parks, or other public facilities?

YES

NO

The GPU EIR found potentially significant impacts to fire protection services, police protection services, school services, and other public services. All impacts were reduced to a level of less than significant with the incorporation of mitigation measures, with the exception of school services, which was found to remain significant and unavoidable.

The Zoning Ordinance Amendments relating to Emergency Shelters and Housing Facilities project would amend the County of San Diego Zoning Ordinance to exempt the development, use, or improvement of new or existing County-owned, operated, financed, leased, and/or contracted Emergency Shelters, Transitional, and Supportive Housing (Housing Facilities) from Zoning Ordinance provisions (project). The project would also expand the definition of "Emergency Shelter" to include 1) safety parking facilities that are not an RV park or mobile home park, 2) safe storage facilities, 3) safe camping facilities receiving direct financial assistance from the County of San Diego, State of California, or the Federal Government, and 4) day shelter facilities.

The project does not intend to re-locate persons experiencing homelessness away from the general communities of homeless gatherings or to areas that do not provide necessary services to assist persons experiencing homelessness. The facilities will be located in areas to address homelessness and related public health, safety, and welfare issues. In addition, a Fire Service Availability Letter would be required prior to subsequent project approvals. The letter is a standard form that is required to be filled out and signed by the fire authority operating in the project area and includes information such as the closest fire station, and the estimated travel time for the fire authority to reach the project site. This estimated travel time is required to meet the travel response time indicated by the General Plan Safety Element. No impacts to schools are expected due to the purpose of the project is not to increase the number of persons experiencing homelessness and that relocation of persons would not occur. For impacts to park facilities, please see XVI. Recreation.

The project has the potential to result in impacts to police protection services for provision and patrol of safe parking facilities, safe storage facilities, and safe camping facilities. County departments, such as the Department of Parks and Recreation (DPR), collaborate with the County of San Diego Sheriff (Sheriff) to enforce the San Diego County Code of Regulatory Ordinances (Regulatory Ordinances). Specifically, DPR partners with the Sheriff to enforce Regulatory Ordinances relating to park and recreation facilities. The Zoning Ordinance amendments relating to Emergency Shelters, Transitional and Supportive Housing, potentially increases the placement options for persons experiencing homelessness which may increase the need for safety services at these facilities for the tenants. County Departments would

continue to further collaborate with the Sheriff to enforce Regulatory Ordinances. However, the GPU EIR identified a potential result in the need for new staffing and/or expanded police facilities in order to maintain acceptable response times for police protection services. The GPU EIR found that implementation of the GPU policies and mitigation measures would reduce potentially significant direct and cumulative impacts to a level of less than significant.

The project does not propose any development under this discretionary action. Future development or improvement of new or existing County-owned Emergency Shelters and Housing Facilities would be required to conduct a subsequent environmental review prior to the authorization for individual project development. At the time a subsequent review is conducted, individual projects would be analyzed under CEQA for project-specific impacts and would apply GPU EIR mitigation measures or other measures, as necessary. Subsequent projects would also be required to conform to the County's General Plan Policies such as Policy LU-12.3: Infrastructure and Services Compatibility, Policy S-3.4: Service Availability, Policy LU-12.4: Planning for Compatibility. As identified by the GPU EIR, these policies would encourage the collocation of facilities, site public facilities in a manner compatible with community character, minimize visual and environmental impacts, and plan for development where fire and emergency services are available or planned. The project would not result in any significant impacts related to public facilities beyond what was previously analyzed within the GPU EIR.

Because the project does not propose any development under this discretionary action, implementation of the project would not result in significant adverse effects on public services, and future development and improvement of County-owned Emergency Shelters and Housing Facilities would be required to conduct subsequent CEQA review and apply GPU EIR mitigation measures or other measures as necessary, the project would not contribute to a cumulatively considerable effect on public services.

XVI. RECREATION -- Since the previous EIR was certified or previous ND was adopted, are there any changes in the project, changes in circumstances under which the project is undertaken, and/or "new information of substantial importance" that result in an increase in the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; or that include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

YES

NO

The GPU EIR found potentially significant impacts related to the deterioration of parks and recreational facilities and the construction of new recreational facilities. All impacts were reduced to a level of less than significant with the incorporation of mitigation measures.

The Zoning Ordinance Amendments Emergency Shelters and Housing Facilities project would amend the County of San Diego Zoning Ordinance to exempt the development, use, or improvement of new or existing County-owned, operated, financed, leased, and/or contracted Emergency Shelters, Transitional, and Supportive Housing (Housing Facilities) from Zoning Ordinance provisions (project). The project would also expand the definition of "Emergency Shelter" to include 1) safety parking facilities that are not an RV park or mobile home park, 2) safe

storage facilities, 3) safe camping facilities receiving direct financial assistance from the County of San Diego, State of California, or the Federal Government, and 4) day shelter facilities.

The project would not result in adverse impacts related to the deterioration of parks and recreational facilities or the requirement for the construction of new recreational facilities. The project would encourage persons experiencing homelessness to stay in safe parking facilities rather than in County-owned public park and recreation facility parking lots, thus reducing impacts to and deterioration of these facilities. Additionally, the provision of safe camping facilities would achieve a similar reduction in the deterioration of parks and recreational facilities by discouraging camping in day-use only or restricted use areas.

Because the project does not propose any development under this discretionary action and implementation of the project would not result in significant adverse effects on recreation, the project would not contribute to a cumulatively considerable effect on recreation.

XVII. TRANSPORTATION -- Since the previous EIR was certified or previous ND was adopted, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause effects to transportation/traffic including: an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system; exceedance, either individually or cumulatively, of a level of service standard established by the county congestion management agency for designated roads or highways; a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks; substantial increase in hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); inadequate emergency access; inadequate parking capacity; and/or a conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?

YES

NO

The GPU EIR found potentially significant impacts to traffic and Level of Service (LOS) standards, rural road safety, emergency access, parking capacity, and alternative transportation. Emergency access, parking capacity, and alternative transportation were reduced to a less than significant level with the incorporation of mitigation measures, while traffic and LOS standards, and rural road safety, remained significant and unavoidable.

The project has the potential to create impacts related to transportation and traffic. Trips generated by the project would be from employee trips and to a lesser extent from persons experiencing homelessness who own and operate a vehicle if any. As part of the project, future subsequent projects could result in the creation of safe parking facilities for use by persons experiencing homelessness that have a vehicle. The project revises the definition of an Emergency Shelter to include a parking lot owned or leased by a city, county, or city and county specifically identified as one allowed for safe parking by persons experiencing homelessness and unstably housed individuals. While the project is unlikely to increase the total number of vehicles distributed on roadways in the County, it has the potential to increase traffic on roadways adjacent to safe parking facilities.

The County of San Diego has presented the Framework for Siting Emergency Shelters, Transitional and Supportive Housing, or Homeless Services in Unincorporated San Diego County (Location Framework) which is intended to apply to the subsequent projects that are County-owned, operated,

financed, leased, and/or contracted Emergency Shelters or Housing Facilities. The Location Framework demonstrates the four-step review process the County will take, to identify, evaluate and potentially site facilities and services allowable under the zoning ordinance amendment. Of which Vehicle Miles Traveled is a criterion the County will review when identifying potential future sites. Additionally, the Location Framework includes a high-level internal process the subsequent Emergency Shelters, and Housing Facilities would progress through when a future project is planned. This internal process does include steps for future CEQA analysis. Therefore, subsequent projects will have a process to identify potential sites for Emergency Shelters and Housing Facilities using criteria that identified VMT efficient areas. For subsequent projects, it is anticipated that increases would be slight and are not expected to surpass County thresholds (250 average daily trips). Persons experiencing homelessness, in general, are expected to create fewer VMTs than the general population due to lack of vehicle ownership and vehicle use. In addition, the GPU EIR identified unincorporated County traffic and LOS standards as well as adjacent cities traffic and LOS standards, as significant and unavoidable. Therefore, the project would not result in impacts from LOS beyond the analysis within the GPU EIR. Subsequent projects would be analyzed under CEQA for project-specific impacts and would apply GPU EIR mitigation measures or other measures, as necessary.

Senate Bill (SB) 743 was signed into law on September 27, 2013, and changed the way that public agencies are to evaluate transportation impacts under CEQA. In response, the Governor's Office of Planning and Research updated the CEQA guidelines and recommended that Vehicle Miles Travelled (VMT) be the primary metric for evaluation. When determining whether subsequent and supplemental analyses are required under Public Resources Code section 21166, the lead agency should focus the inquiry on whether there are substantial changes in the project or circumstances that would require major revisions of the document, or if new information, which was not known and could not have been known at the time of becomes available.

The project will not re-locate persons experiencing homelessness to areas that do not provide necessary services to assist persons experiencing homelessness and therefore is unlikely to increase average VMT in any one area within the County. In addition, homeless shelters would be considered a locally serving public facility by the County Transportation Study Guidelines and would therefore be screened out of CEQA VMT analysis.

The project does not propose any development under this discretionary action. Future development or improvement of new or existing County-owned Emergency Shelters and Housing Facilities would be required to conduct a subsequent environmental review prior to the authorization for individual project development. At the time a subsequent review is conducted, individual projects would be analyzed under CEQA for project-specific impacts and would apply GPU EIR mitigation measures or other measures, as necessary. Subsequent projects would be required to conform to the County's Guidelines for Transportation and Traffic, as identified by the GPU EIR mitigation measure Tras-1.4, which has now been updated to the Transportation Study Guide. Subsequent projects would also be required to conform to the County's General Plan Policies such as Policy M-5.1: Regional Coordination and Policy LU-4.3: Relationship of Plans in Adjoining Jurisdictions. As identified by the GPU EIR, these policies would require coordination with regional planning agencies, transit agencies, and adjacent jurisdictions and considerations of these agencies and jurisdictions' plans and projects. The project would not result in any significant impacts related to transportation and traffic beyond what was previously analyzed within the GPU EIR.

Because the project does not propose any development under this discretionary action, implementation of the project would not result in significant adverse effects on transportation, and future development and improvement of County-owned Emergency Shelters and Housing Facilities would be required to conduct subsequent CEQA review and apply GPU EIR mitigation measures or other measures as necessary, the project would not contribute to a cumulatively considerable effect on transportation.

XVIII. TRIBAL CULTURAL RESOURCES -- Since the previous EIR was certified or previous ND was adopted, are there any changes in the project, changes in circumstances under which the project is undertaken, and/or "new information of substantial importance" that cause one or more effects to tribal cultural resources including: causing a change in the significance of a tribal cultural resource as defined in Public Resource Code §21074?

YES

NO

Since the GPU EIR (PDS2002-3910-02ZA001[ER], SCH#2002111067) was certified, there has been a change in circumstances. Assembly Bill 52 (AB-52) became effective on July 1, 2015. AB-52 requires that tribal cultural resources (TCR) be evaluated under CEQA. AB-52 consultation does not apply since the environmental document is not a Negative Declaration (ND), Mitigation Negative Declaration (MND), or Environmental Impact Report (EIR).

The project would have no ground-disturbing activities; however, AB-52 consultation would apply to subsequent projects that would require an ND, MND, or EIR. The mitigation for identified TCR would be similar to cultural resources as discussed in the GPU EIR for cultural and archaeological resources. If TCR is identified during AB-52 consultation for subsequent projects, the following GPU EIR mitigation measures would be required, as necessary: Cul-2.1 through Cul-2.6 and Cul-4.1. These measures require the following:

- Develop management and restoration plans for identified and acquired properties with cultural resources;
- Facilitate the identification and acquisition of important resources through collaboration with agencies, tribes, and institutions such as the South Coast Information Center (SCIC), while maintaining the confidentiality of sensitive information;
- Support the dedication of easements that protect important cultural resources by using a variety of funding methods, such as grants or matching funds, or funds from private organizations;
- Protect undiscovered subsurface archaeological resources by requiring grading monitoring by a qualified archaeologist and a Native American Monitor for ground disturbing activities in the vicinity of known archaeological resources, and also, when feasible during initial surveys;
- protect significant resources by facilitating the identification and acquisition of important resources through regional coordination with agencies, and institutions such as the NAHC and local tribal governments including SB-18 review, while maintaining the confidentiality of sensitive cultural information;
- Include regulations and procedures for the discovery of human remains in all land disturbance and archaeological-related programs. Ensure that all references to the discovery of human remains promote the preservation and include proper handling and coordination with Native American groups. Apply appropriate mitigation when impacts are significant.

Because the project does not propose any development under this discretionary action, implementation of the project would not result in significant adverse effects on tribal cultural resources. Future development or improvement of new or existing County-owned Emergency Shelters and Housing Facilities would be required to conduct a subsequent environmental review prior to the authorization for individual project development. At the time a subsequent review is conducted, individual projects would be analyzed under CEQA for project-specific impacts and would apply GPU EIR mitigation measures or other measures, as necessary. Future subsequent projects would also be required to comply with AB-52, if applicable. Therefore, the project would not have a substantial adverse effect on tribal cultural resources and the project would not contribute to a cumulatively considerable effect on tribal cultural resources.

XVX. UTILITIES AND SERVICE SYSTEMS -- Since the previous EIR was certified or previous ND was adopted, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause effects to utilities and service systems including: exceedance of wastewater treatment requirements of the applicable Regional Water Quality Control Board; require or result in the construction of new water or wastewater treatment facilities, new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects; require new or expanded entitlements to water supplies or new water resources to serve the project; result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments; be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs; and/or noncompliance with federal, state, and local statutes and regulations related to solid waste?

YES

NO

The GPU EIR identified potentially significant impacts to wastewater treatment requirements, water, and wastewater treatment facilities, sufficient stormwater drainage facilities, water supplies, and landfill capacity. All impact areas were reduced to a less than significant level of significance with the incorporation of mitigation measures with the exception of water supplies and landfill capacity which were determined to remain significant and unavoidable.

The Zoning Ordinance Amendments Emergency Shelters and Housing Facilities project would amend the County of San Diego Zoning Ordinance to exempt the development, use, or improvement of new or existing County-owned, operated, financed, leased, and/or contracted Emergency Shelters, Transitional, and Supportive Housing (Housing Facilities) from Zoning Ordinance provisions (project). The project would also expand the definition of "Emergency Shelter" to include 1) safety parking facilities that are not an RV park or mobile home park, 2) safe storage facilities, 3) safe camping facilities receiving direct financial assistance from the County of San Diego, State of California, or the Federal Government, and 4) day shelter facilities.

The project would encourage the shelter of persons experiencing homelessness to designated areas that would be located within various water and wastewater districts throughout the County. It is unlikely that these facilities would be sited outside of the County Water Authority boundary. The project would comply with wastewater treatment requirements of the Regional Water Quality Control Board. The RWQCBs with jurisdiction over San Diego County have authorized the County of

San Diego, Department of Environmental Health and Quality (DEHQ), to issue certain on-site wastewater system (OSWS) permits throughout the County and within the incorporated cities. The Project would require DEHQ approval to ensure adequate design, location, sizing, spacing, construction, and maintenance of any OSWSs utilized or constructed for the project.

The project will not re-locate persons experiencing homelessness to areas that do not provide necessary services to assist persons experiencing homelessness and would not increase water usage or waste production beyond current conditions. The project would encourage greater compliance with federal, state, and local statutes and regulations related to solid waste.

In addition, the project does not propose any development under this discretionary action. Future development or improvement of new or existing County-owned Emergency Shelters and Housing Facilities would be required to conduct a subsequent environmental review prior to the authorization for individual project development. At the time a subsequent review is conducted, individual projects would be analyzed under CEQA for project-specific impacts and would apply GPU EIR mitigation measures or other measures, as necessary. The project would not result in any significant impacts related to utilities and service systems beyond what was previously analyzed within the GPU EIR.

Because the project does not propose any development under this discretionary action, implementation of the project would not result in significant adverse effects on utilities and service systems, and future development and improvement of County-owned Emergency Shelters and Housing Facilities would be required to conduct subsequent CEQA review and apply GPU EIR mitigation measures or other measures as necessary, the project would not contribute to a cumulatively considerable effect on utilities and service systems.

XX. Wildfire – Since the previous EIR was certified or previous ND was adopted, are there any changes in the project, changes in circumstances under which the project is undertaken, and/or "new information of substantial importance" that cause effects to wildfire for projects located in or near state responsibility areas or lands classified as very high fire hazard severity zones including: substantially impair an adopted emergency response plan or emergency evacuation plan; due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire; and/or require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

YES

NO

Wildfire was analyzed within the GPU EIR within Section 2.7, Hazards and Hazardous Materials. The guidelines for determining significance stated: the proposed General Plan Update would have a significant impact if it would expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands. In 2019, the issue of Wildfire was separated into its section within Appendix G of the CEQA Guidelines to incorporate the four issue questions above. The GPU EIR did address these issues within the analysis; however, they were not called out as separate issue areas. Within the GPU EIR, the issue of Wildland Fires was determined to be significant and unavoidable.

The Zoning Ordinance Amendments Emergency Shelters and Housing Facilities project would amend the County of San Diego Zoning Ordinance to exempt the development, use, or improvement of new or existing County-owned, operated, financed, leased, and/or contracted Emergency Shelters, Transitional, and Supportive Housing (Housing Facilities) from Zoning Ordinance provisions (project). The project would also expand the definition of "Emergency Shelter" to include 1) safety parking facilities that are not an RV park or mobile home park, 2) safe storage facilities, 3) safe camping facilities receiving direct financial assistance from the County of San Diego, State of California, or the Federal Government, and 4) day shelter facilities.

The project has the potential to create impacts related to wildfire. The majority of the County is designated as a Very High and High Fire Hazard Severity Zone (FHSZ), except for the Desert and eastern Mountain Empire subregions, which are in the Moderate FHSZ. There are also areas of Moderate FHSZ and un-zoned areas in the more densely populated communities around the County. The project will not re-locate persons experiencing homelessness away from known locations of homeless gatherings or to areas that do not provide necessary services to assist persons experiencing homelessness. Future subsequent projects would likely place facilities in more densely populated communities, where the risk of wildland fires is lower, and in closer proximity to fire district facilities.

The project would comply with regulations relating to emergency access, water supply, and defensible space specified in the County Fire Code and Consolidated Fire Code. Implementation of these fire safety standards would occur prior to project approval, as identified by GPU mitigation measures Haz-4.2 and Haz-4.3.

In addition, the project does not propose any development under this discretionary action. Future development or improvement of new or existing County-owned Emergency Shelters and Housing Facilities would be required to conduct a subsequent environmental review prior to the authorization for individual project development. At the time a subsequent review is conducted, individual projects would be analyzed under CEQA for project-specific impacts and would apply GPU EIR mitigation measures, as necessary. The project would not result in any significant impacts related to wildfire beyond what was previously analyzed within the GPU EIR.

Because the project does not propose any development under this discretionary action, implementation of the project would not result in significant adverse effects from wildfire, and future development and improvement of County-owned Emergency Shelters and Housing Facilities would be required to conduct subsequent CEQA review and apply GPU EIR mitigation measures as necessary, the project would not contribute to a cumulatively considerable effect from wildfire.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE – Since the previous EIR was certified or previous ND was adopted, are there any changes in the project, changes in circumstances under which the project is undertaken, and/or "new information of substantial importance" that result in any mandatory finding of significance listed below?

Does the project degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or

endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?

YES

NO

Per the instructions for evaluating environmental impacts in this environmental document, the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory were considered in the response to each question in sections IV and V of this form. In addition, to project specific impacts, this evaluation considered the project's potential for significant cumulative effects. There is no substantial evidence that there are biological or cultural resources that would be affected or associated with this project. Therefore, this project has been determined not to meet this Mandatory Finding of Significance.

Per the instructions for evaluating environmental impacts in this environmental document, the potential for adverse cumulative effects was considered in the response to each question in sections I through XX of this form. In addition, to project specific impacts, this evaluation considered the project's potential for incremental effects that are cumulatively considerable. As a result of this evaluation, there is no substantial evidence that there are cumulative effects associated with this project. Therefore, this project has been determined not to meet this Mandatory Finding of Significance.

In the evaluation of environmental impacts in this environmental document, the potential for adverse direct or indirect impacts to human beings was considered in the response to certain questions in sections: I. Aesthetics, III. Air Quality, VI. Geology and Soils, VIII. Hazards and Hazardous Materials, IX Hydrology and Water Quality, XII. Noise, XIII. Population and Housing, and XVI. Transportation and Traffic. As a result of this evaluation, there is no substantial evidence that there are adverse effects on human beings associated with this project. Therefore, this project has been determined not to meet this Mandatory Finding of Significance.

XX. REFERENCES USED IN THE COMPLETION OF THE ENVIRONMENTAL REVIEW
UPDATE CHECKLIST FORM

California Department of Fish and Wildlife. Fish and Wildlife Code, Section 1600 *et. seq.*

California Environmental Quality Act, CEQA Guidelines

California Environmental Quality Act. 2001. California Code of Regulations, Title 14, Chapter 3, Section 15382.

County Code of Regulatory Ordinances, Title 3, Division 5, Chapter 3

County of San Diego County Framework for Siting Emergency Shelters, Transitional and Supportive Housing, or Homeless Services in Unincorporated San Diego County (Location Framework), 2021.

County of San Diego General Plan, 2011.

County of San Diego General Plan Final Program EIR, certified on August 3, 2011.

County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements for Agricultural Resources, approved March 19, 2007.

County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements for Air Quality, approved March 19, 2007

County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements for Biological Resources, approved September 15, 2010

County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements for Cultural Resources: Archaeological and Historical Resources, approved December 5, 2007

County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements for Geologic Hazards, approved July 30, 2007

County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements for Mineral Resources, approved July 30, 2008

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