



MARK WARDLAW  
*Director*  
BETH A. MURRAY  
*Assistant Director*

**County of San Diego**  
**PLANNING & DEVELOPMENT SERVICES**

5510 OVERLAND AVENUE, SUITE 110, SAN DIEGO, CALIFORNIA 92123  
INFORMATION (858) 694-2960  
TOLL FREE (800) 411-0017  
[www.sdcounty.ca.gov/pds](http://www.sdcounty.ca.gov/pds)

February 8, 2013

**Environmental Findings for Housing Element Update, General Plan  
Amendment (GPA) 12-009**

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 certified environmental impact report (EIR) covering the project for which a subsequent discretionary action is required. These environmental findings have 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 Housing Element Update, GPA 12-009.

**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. The certified Program 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 with the exception of 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 previously certified Program EIR is available at <http://www.sdcounty.ca.gov/pds/gpupdate/environmental.html>.

**2. Summary of the proposed project:**

Government Code Section 65583 states that the Housing Element for each jurisdiction consist of an identification and analysis of existing and projected housing needs and a statement of goals, policies, programs, strategies, quantified objectives, financial resources, and scheduled programs for the preservation, improvement and development of housing. The Housing Element must identify adequate sites for housing, including rental housing, factory-built housing and mobile homes, and make adequate provisions for the existing and projected needs of all economic segments of the community. The Housing Element is required to be adopted 18 months following

the adoption of the Regional Transportation Plan by the San Diego Association of Governments. For the County, state law requires that our Housing Element be updated by April 30, 2013.

In compliance with state law, the project is an update to the Housing Element of the General Plan. Because the Element was last updated by the Board of Supervisors in August 2011, the proposed changes are largely limited to the Background Report of the Housing Element, which is proposed to be updated with recent demographic data and analyses. The update also addresses the County's ability to meet the State's new Regional Housing Needs Assessment (RHNA) goals through the County's Sites Inventory and increases the planning cycle, or periodic Housing Element update deadline, from 7.5 years to 11 years.

**3. 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"/>

As described in the attached addendum, the proposed Housing Element Update only differs from the information within the current Housing Element, as analyzed in the certified Program EIR, with regard to the Regional Housing Needs Assessment (RHNA) requirements.

State Housing Element law requires that a local jurisdiction accommodate a share of the region's projected housing needs for a particular planning period. This share, called the RHNA, is important because state law mandates that jurisdictions identify sufficient land in the Housing Element to accommodate a variety of housing opportunities for all economic segments of the community. At the time of adoption, the previous Housing Element identified 12,358 sites meeting RHNA requirements as required by state law. The proposed Housing Element Update identifies 22,412 sites. The increased number of sites is consistent with the increased planning cycle (from 7.5 years to 11 years).

The changes to the Program EIR as set forth in the attached addendum are for clarification and planning purposes only. The additional inventory sites identified by the County are existing possible development opportunities within existing zoning and land use densities. This Housing Element update does not result in any changes to the General Plan land use map or zoning. Therefore, the identification of these sites does not create new development opportunities that did not previously exist and there is no requirement that the identified sites be developed as identified. The Program EIR evaluated the Housing Element and the proposed Housing Element update does not create substantial changes in the proposed project or provide new information of substantial importance that were not previously analyzed by the Program EIR. The minor changes identified in the addendum, including the identification of additional RHNA sites, will not result in any physical changes to the environment that were not previously analyzed. Therefore, none of the conditions described in CEQA Guidelines Section 15162 calling for preparation of a subsequent EIR have occurred and the Housing Element update will not result in new or more severe environmental impacts.

**4. Subject areas determined to have new or substantially more severe significant environmental effects compared to those identified in the previous EIR.**

The subject areas checked below were determined to be new significant environmental effects or to be previously identified effects that have a substantial increase in severity either due to a change in project, change in circumstances or new information of substantial importance.

NONE

Aesthetics

Agriculture Resources

Air Quality

Biological Resources

Cultural Resources

Geology/Soils

Hazards & Haz. Materials

Hydrology/Water Quality

Land Use/Planning

Mineral Resources

Noise

Population/Housing

Public Services

Recreation

Transportation/Traffic

Utilities/Service Systems

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 Program EIR 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 Program EIR is adequate upon completion of an addendum.



February 8, 2013

Signature

Date

Jeff Murphy

Chief/Land Use

Printed Name

Title

Attachments

- Previous environmental documentation (including previous addenda) available at:  
[http://www.sdcounty.ca.gov/pds/advance/CAP\\_Environmental\\_Documentation.pdf](http://www.sdcounty.ca.gov/pds/advance/CAP_Environmental_Documentation.pdf)
- Addendum to the previously certified Program EIR dated February 8, 2013



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**AN ADDENDUM TO THE PREVIOUSLY CERTIFIED PROGRAM ENVIRONMENTAL  
IMPACT REPORT FOR THE COUNTY OF SAN DIEGO GENERAL PLAN UPDATE  
(SCH 2002111067)**

**FOR PURPOSES OF CONSIDERATION OF  
Housing Element Update, GPA 12-009**

**February 8, 2013**

**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 or 15163 calling for the preparation of subsequent or supplemental EIR have occurred.**

**Introduction:**

There are some changes and additions, which need to be included in an Addendum to the previously certified Program EIR for the County of San Diego General Plan Update to accurately cover the new project in accordance with CEQA Guidelines Section 15164 (a). This Addendum provides minor clarifications and information that do not result in the identification of new or substantially more severe significant impacts and any mitigation measures or alternatives substantially reducing significant effects, but found not to be feasible in the Program EIR, that would now be feasible.

**Background:**

This revision to the Housing Element of the County of San Diego General Plan is being conducted in accordance with State law (Government Code Section 65588) which requires that the County's Housing Element be updated by April 30, 2013 to include the identification of sites with appropriate zoning, development standards, services and facilities to accommodate the jurisdiction's Regional Housing Needs Assessment (RHNA) for each income level and to assist in the development of the adequate housing to meet the needs of lower and moderate income households. As part of the comprehensive General Plan Update, the current Housing Element was adopted on August 3, 2011 and approved by the State Department of Housing and Community

Development in November 2011. As part of this Housing Element update, enough sites have been identified to meet the County's RHNA without any land use map revisions.

**Discussion:**

The County's Housing Element consists of a Goals and Policies document, an Implementation Plan and a Background Report. The Background Report provides recent demographic data, accompanied by analyses, that assists the County in determining whether existing goals, policies and implementation programs need to be revised to meet the County's existing and future housing needs. The Background Report for this Housing Element revision was updated with 2010 Census data. The accompanying analysis was also updated. The existing goals and policies were found to be appropriate so no change was needed. The capacity of the land use map was found adequate to provide enough housing to meet future RHNA requirements so no change was needed to the County's land use map, but additional properties were identified in the Background Report to satisfy the increased RHNA goals. No changes were made to these properties. They were simply identified as sites with a density designation adequate to support affordable housing. The Implementation Plan received minor modifications because a lack of funding has caused some programs to be cut back or because programs funded through redevelopment districts has been discontinued based on AB 26. The primary changes to the Housing Element include:

*Goals and Policies document:*

- Updating reference information in the background text.
- Adding a note regarding the dissolution of California redevelopment agencies as of February 1, 2012 pursuant to AB 26.

*Background Report (including Sites Inventory)*

- Updating tables and figures to reflect more recent demographic data.
- Updating the analyses and discussions related to the new demographic data.
- Identifying additional properties in the Sites Inventory to demonstrate that the County has land zoned at sufficient densities to meet new RHNA requirements which increased from 12,358 to 22,412 residential units due to the length of the planning cycle increasing from seven and a half to eleven years.

*Implementation Plan*

- Updating the status of programs and actions in the Housing Element Implementation Plan to reflect those that have recently been completed, discontinued, or reflect reduced available funding.

These revisions do not constitute substantial changes to the General Plan Update, its circumstances, or include new information of substantial importance. The modifications would not involve substantial changes in the magnitude of impacts identified in the General Plan Program EIR and would not create new potentially significant impacts that would require mitigation. This conclusion is based on the following analysis:

The changes and additions, which need to be included in an Addendum to the previously certified EIR to accurately cover the new project, are described below with additions shown in underline and the deletions shown in strike out:

EIR – Volume 1

1. Section 2.12.2.2, change the first bullet point under the heading “State Housing Element Law” as follows:
  - Provide sites with appropriate zoning and development standards and with services and facilities to accommodate the jurisdiction’s Regional Housing Needs Assessment (RHNA) for each income level. The RHNA is the only population and/or housing requirement that applies to the General Plan Update. The County’s RHNA is ~~12,358~~ 22,412 residential units for the ~~2005 2013~~ – ~~2040~~ 2020 Housing Element Cycle.
2. Section 2.12.3.2, change the last paragraph under the heading “Impact Assessment” as follows: Consistent with State law, the County’s land use plan provides adequate capacity to exceed its most recent RHNA of ~~12,358~~ 22,412 new residential units by accommodating up to 71,540 new residential units. Therefore, the General Plan Update would not displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere.
3. Section 2.12.3.2, change the paragraph under the heading “Federal, State, and Local Regulations and Existing Regulatory Processes” as follows: The State Housing Element Law, Section 65580 of the Government Code, requires that the Housing Element of a General Plan contain local commitments to provide sites with appropriate zoning and development standards and with services and facilities to accommodate the jurisdiction’s RHNA for each income level. The RHNA is the only population and/or housing requirement that applies to the General Plan Update. As stated above, the County’s land use plan provides adequate capacity to exceed its most recent RHNA of ~~12,358~~ 22,412 residential units.
4. Section 2.12.3.3, change the paragraph under the heading “Federal, State, and Local Regulations and Existing Regulatory Processes” as follows: As described above in Section 2.12.3.2, Issue 2: Displacement of Housing, the RHNA is the only population and/or housing requirement that applies to the General Plan Update. The County’s land use plan provides adequate capacity to exceed its most recent RHNA of ~~12,358~~ 22,412 residential units.
5. Section 3.1.1, change the following paragraph as follows: The residential land use designations in the General Plan Update provide adequate housing capacity to meet the unincorporated County’s most recent Regional Housing Needs Assessment (RHNA) of ~~12,358~~ 22,412 additional residential units. Therefore, the General Plan Update would result in future residential development that would result in population growth.

6. Section 4.2.2.12, change the following paragraph under the heading “Displacement of Housing” as follows: Similar to the proposed project, new development under the Hybrid Map Alternative would have the potential to result in the displacement of existing housing. Some areas that currently contain residences are designated for commercial or other non-residential land uses under this alternative and future construction of these non-residential land uses would have the potential to displace the existing housing. However, increases in residential density elsewhere would sufficiently replace displaced housing in the unincorporated County so that the RHNA would be accommodated. Consistent with State law, the Hybrid Map Alternative land use plan provides adequate capacity to exceed its RHNA of ~~12,358~~ 22,412 new residential units by accommodating up to 68,224 new residential units; therefore, it would not necessitate the construction of replacement housing outside of the unincorporated area. Similar to the proposed project, the Hybrid Map Alternative would not result in a significant impact associated with the displacement of housing.

EIR – Volume 4

1. Section 3.12, change the paragraph under the heading “Displacement of Housing” as follows: However, increases in residential density elsewhere would sufficiently replace displaced housing in the unincorporated County so that the RHNA would be accommodated. Consistent with State law, the Recommended Project land use plan provides adequate capacity to exceed its most recent RHNA of ~~12,358~~ 22,412 new residential units by accommodating up to 65,804 new residential units; therefore, it would not necessitate the construction of replacement housing outside of the unincorporated area.

**Finding:**

It is hereby found that there are no changes in the project, no changes in the circumstances under which the project is undertaken, or no new information which results in a new significant environmental effect or a substantial increase in the severity of a previously identified significant environmental effect since the certification of the previous Environmental Impact Report for the project dated August 3, 2011, on file with PDS as Environmental Review Number 02-ZA-001.