

**NOTICE OF FINDING OF NO SIGNIFICANT IMPACT
AND NOTICE OF INTENT TO REQUEST RELEASE OF
FUNDS**

Date: March 27, 2022

County of San Luis Obispo
Dept. of Planning and Building
976 Osos Street, Room 300
San Luis Obispo, CA 93408
(805) 781-5787

On or about April 12, 2022 the County of San Luis Obispo will submit a request to California Department of Housing and Community Development (HCD) for the release of Community Development Block Grant Program CARES Act (CDBG-CV) funds under the CARES Act of 2021, to undertake a project known as the Paso Robles Homekey Project: Rehabilitate Transitional Housing and an Emergency Shelter Facility Project by the Housing Authority of San Luis Obispo, located at 1134 Black Oak Drive, Paso Robles, CA., 93446, for the purpose of interior and exterior alterations, excluding excavation to the grounds, for critical infrastructure replacements, such as roof repairs, replacing the outdated plumbing, electrical upgrades, life and safety enhancements, and activity delivery costs associated with the project to prevent, prepare for and respond to the coronavirus.

The proposed project consists of Coronavirus Aid, Relief, and Economic Security Act (CARES Act) Community Development Block Grant (CDBG-CV) program funds set-aside for Homekey Projects by the California Department of Housing and Community Development (HCD) for Contract No.: 21-CDBG-HK—00024 / CFDA #14.228, in the amount of \$4,618,499. Note: the County of San Luis Obispo also received CDBG-CV administrative funds per the above-mentioned contract in the amount of \$154,431. The County completed the necessary National Environmental Policy Act (NEPA) document to comply with 24 CFR Part 58 of the federal regulations for the administrative funds. Total contract award is \$4,772,930.

The activities proposed are categorically excluded under HUD regulations at 24 CFR Part 58 from National Environmental Policy Act (NEPA) requirements. An Environmental Review Record (ERR) that documents the environmental determinations for this project is on file at County of San Luis Obispo, 976 Osos Street, Room 300 and may be examined or copied weekdays 8 AM to 5 PM and is also available online at:

<https://www.slocounty.ca.gov/Departments/Planning-Building/Department-Services/Housing/Updates-Meetings.aspx>.

PUBLIC COMMENTS

Any individual, group, or agency may submit written comments on the ERR to the County of San Luis Obispo's Department of Planning and Building at the address above or via e-mail to Tony Navarro, Program Manager II, at tnavarro@co.slo.ca.us. All comments received by 5:00 pm on April 11, 2022, will be considered by the County of San Luis Obispo prior to authorizing submission of a request for release of funds.

ENVIRONMENTAL CERTIFICATION

The County of San Luis Obispo certifies to HCD that Trevor Keith, in his capacity as Director of the Department of Planning and Building, consents to accept the jurisdiction of the Federal Courts if an action is brought to enforce responsibilities in relation to the environmental review process and that these responsibilities have been satisfied. HCD's approval of the certification satisfies its responsibilities under NEPA and related laws and authorities and allows the *County of San Luis Obispo* to use Program funds.

OBJECTIONS TO RELEASE OF FUNDS

HCD will accept objections to its release of funds and the County of San Luis Obispo's certification for a period of fifteen days following the anticipated submission date or its actual receipt of the request (whichever is later) only if they are on one of the following bases: (a) the certification was not executed by the Certifying Officer of the County of San Luis Obispo; (b) the County of San Luis Obispo has omitted a step or failed to make a decision or finding required by HUD regulations at 24 CFR part 58; (c) the grant recipient or other participants in the development process have committed funds, incurred costs or undertaken activities not authorized by 24 CFR Part 58 before approval of a release of funds by HCD or (d) another Federal agency acting pursuant to 40 CFR Part 1504 has submitted a written finding that the project is unsatisfactory from the standpoint of environmental quality. Objections must be prepared and submitted in accordance with the required procedures (24 CFR Part 58, Sec. 58.76) and shall be addressed to the California Department of Housing and Community Development at 2020 West El Camino Avenue, Sacramento, CA 95833 or emailed to nepacomments@hcd.ca.gov. Potential objectors should contact HCD to verify the actual last day of the objection period.

Certifying Officer
Trevor Keith, Director
Department of Planning and Building
976 Osos Street, Room 300
San Luis Obispo, CA 93408



U.S. Department of Housing and Urban Development
451 Seventh Street, SW Washington, DC 20410
www.hud.gov espanol.hud.gov

**Environmental Review for Activity/Project that is Categorically
Excluded Subject to Section 58.5
Pursuant to 24 CFR 58.35(a)**

Project Information

Project Name: Project Homekey: Rehabilitate Transitional Housing and an Emergency Shelter Facility Project by the Housing Authority of the City of San Luis Obispo

Responsible Entity: County of San Luis Obispo

Grant Recipient (if different than Responsible Entity):

State/Local Identifier: California, County of San Luis Obispo

Preparer(s): Tony Navarro, Program Manager II

Certifying Officer Name and Title: Xzandrea Fowler, Planning Manager/Environmental Coordinator

Grant Recipient (if different than Responsible Entity):

Consultant (if applicable):

Direct Comments to: Tony Navarro, (805) 781- 5787, tnavarro@co.slo.ca.us

Project Location: 1134 Black Oak Drive, Paso Robles, CA (see Figures #1- 7 and Attachment A – Site Photographs).

Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:

The proposed Project proposes to use federal funds under the Coronavirus Aid, Relief, and Economic Security Act (CARES Act) Community Development Block Grant (CDBG-CV) program funds set-aside for Homekey Projects by the California Department of Housing and Community Development (HCD) for Contract No.: 21-CDBG-HK—00025 / CFDA #14.228, in the amount of \$4,618,499, for interior and exterior alterations, excluding excavation to the grounds, for critical infrastructure replacements, such as roof repairs, replacing the outdated plumbing, electrical upgrades, life and safety enhancements, and activity delivery costs associated with the Project directly related to the *Prevention, Prepare for, and Respond to Coronavirus*. The proposed scope of work includes the following rehab items to increase the functionality and living experience for the residents as follow:

- Roof repair,
- Temporary relocation,
- Plumbing submeter,
- Plumbing upgrade,

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- Electric upgrades and submeter,
- Permanent housing kitchen upgrades and bathroom remodel,
- Food preparation area - interim housing,
- Security cameras,
- Fire sprinklers & water filter system,
- ECHO - external storage / lockers,
- ECHO - furniture/fixtures,
- Fitness equipment,
- Interior painting,
- Irrigation upgrade,
- Additional Stairways to second floor for egress,
- Professional Services - architecture/consultants/permit fees; and
- Administration Costs - 7%.

All work will occur within the 500-year flood zone and the Project is out of the 100-year Special Flood Hazard Area, floodway, or wetland areas of the Salinas River.

The Project site is a former motel, constructed in 1989, consisting of four buildings with 122 motel guest rooms. The former motel was converted to provide 42 units of interim housing (non-congregate emergency shelter) operated by the El Camino Homeless Organization (ECHO), and 60 units of transitional and permanent housing for those experiencing homelessness, or at-risk of homelessness and at-risk of the coronavirus, operated by the HASLO and Peoples' Self-Help Housing Corporation (PSHHC).

HASLO applied for and was awarded CDBG-CV3 and ESG-CV2 CARES Act funds to rehabilitate areas of the Project site as a separate project, not included in this environmental review document.

The Project site consists of ornamental trees, valley oaks, shrubs, and landscaping typical for a former motel facility. Existing landscaping/vegetation will remain.

The Project site is situated in an area dominated by commercial and retail uses in the northern part of the City of Paso Robles, west of Highway 101 and the Salinas River. The Project site is bounded by a building supply wholesale distributor to the north; fast food restaurants to the south; Highway 101 to the east, and a vacant lot, hotels, and railroad tracks to the west. The Project building was constructed in 1989 as provided by the City of Paso Robles' Certificate of Occupancy dated June 23, 1989, as obtained by the County for its record.

Level of Environmental Review Determination:

Categorically Excluded per 24 CFR 58.35(a), and subject to laws and authorities at §58.5:

- (1) Acquisition, repair, improvement, reconstruction, or rehabilitation of public facilities and improvements (other than buildings) when the facilities and improvements are in place and will be retained in the same use without change in size or capacity of more than 20 percent (e.g., replacement of water or sewer lines, reconstruction of curbs and sidewalks, repaving of streets).

Funding Information

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Grant Number	HUD Program	Funding Amount
21-CDBG-HK-00025/CFDA #14.228	CDBG-CV2	\$4,618,499

Estimated Total HUD Funded Amount:

\$4,618,499 (total includes \$288,656 for eligible activity delivery costs)

Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]:

\$4,618,499

Compliance with 24 CFR 50.4, 58.5, and 58.6 Laws and Authorities

Record below the compliance or conformance determinations for each statute, executive order, or regulation. Provide credible, traceable, and supportive source documentation for each authority. Where applicable, complete the necessary reviews or consultations and obtain or note applicable permits of approvals. Clearly note citations, dates/names/titles of contacts, and page references. Attach additional documentation as appropriate.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.6		
Airport Hazards 24 CFR Part 51 Subpart D	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	Based on a review of the FAA Circle Search for Airports and the USEPA NEPA Assist Environ Mapper too, the Project site is not within 15,000 feet of a military airfield or 2,500 feet of an FAA designated civil airport. The nearest airport to the Project site is the Paso Robles Municipal Airport, which is located approximately 3.51 miles from the Project site and the Project is not located within a Runway Clear Zone or Clear Zone, as defined in 24 CFR part 51. See Figure #8. The Project is compliant with 24 CFR Part 51, Subpart D.
Coastal Barrier Resources Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	There are no coastal barriers along the County of San Luis Obispo coast nor that of California (see Figure #9). Therein, no formal compliance steps or mitigation is required under 24 CFR §58.6(c).
Flood Insurance Flood Disaster Protection Act of 1973 and National Flood	Yes No <input checked="" type="checkbox"/> <input type="checkbox"/>	The Project structure or insurable property is located within a FEMA Special Flood Hazard Area according to FIRM #06079C0393G and

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<p>Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]</p>		<p>#06079C0389G, effective on 11/16/021 (see Figure #10). Per 24 CFR Part 58.6 (a) (2). According to FEMA, the City of Paso Robles is a member of the National Flood Insurance Program (https://www.fema.gov/cis/CA.html).</p> <p>For federal grants and other non-loan forms of financial assistance, flood insurance coverage must be continued for the life of the building irrespective of the transfer of ownership. The amount of coverage must at least equal the total project cost or the maximum coverage limit of the National Flood Insurance Program, whichever is less. With flood insurance the Project is compliant with flood insurance requirements.</p> <p>Mitigation Measure</p> <p>M-1. HASLO is required to provide proof of flood insurance to the County. HASLO is required to provide the proof of insurance to the County prior to the execution of the contractual agreement with the County of San Luis Obispo for the CARES Act funds from HCD, via the U.S. Department of Housing and Urban Development (HUD).</p>
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STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.5

<p>Air Quality Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>	<p>Based on EPA's Green Book (https://www.epa.gov/green-book), the Project site's county or air quality management district is in attainment status for the following pollutants: Ozone (8 hours, 2015 standard); Particulate Matter 10 (1987 standard); Lead (2008 standard), and Particulate Matter <2.5 microns. See Figures #11 through 14.</p> <p>The Project consists of both interior and exterior remodel work associated with the rehabilitation of a 32-year-old former motel to bring it into current building standards and to meet Section 8 Housing Quality Standards.</p> <p>The transitional housing is located within Buildings A and B (See Figure #5), and the 42-room emergency shelter in Buildings C and D. Short-term emissions associated with the Project would be generated by construction activities and equipment as well as from temporary mobile sources from workers commuting to the Project area.</p>
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		<p>Air Quality According to state guidelines, the Project site is in attainment status for ozone and PM10 (fine particulate). See Figures #11 through #14. The eastern area of the County of San Luis Obispo is in a non-attainment area for ozone, but the City of Paso Robles is within the attainment area for ozone (see Figure #11).</p> <p>Due to the Project size and that it consists of rehabilitation, the Project will not impact air quality.</p> <p>Fugitive Dust The proposed Project is subject to the San Luis Obispo County Air Pollution Control District's (APCD) California Environmental Quality Act (CEQA) Air Quality Handbook (the Handbook), a guide for assessing the air quality impacts for projects subject to CEQA review.</p> <p>Guidelines in the Handbook define the criteria used by the APCD to determine when an air quality analysis is necessary, the type of analysis that should be performed, the significance of the impacts predicted by the analysis, and the mitigation measures needed to reduce the overall air quality impacts. The use of the Handbook simplifies the process of evaluating and mitigating the potential air quality impacts from new development in San Luis Obispo County.</p> <p>According to the Handbook's section on Operational Screening Criteria for Project Impact,</p> <p><i>"General screening criteria used by the SLO County APCD to determine the type and scope of projects requiring an air quality assessment, and/or mitigation, is presented in Table 1-1. These criteria are based on project size in an urban setting and are designed to identify those projects with the potential to exceed the APCD's significance thresholds. Operational impacts are focused primarily on the indirect emissions (i.e., motor vehicles) associated with residential, commercial and industrial development."</i></p> <p>Based on the San Luis Obispo County Air Pollution Control District (APCD), when construction-related emissions exceed 137</p>
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		<p>pounds per day or 2.5 tons per quarter for Reactive Organic Gases (ROG) or Oxides of Nitrogen (NOX), Best Available Control Technology for construction equipment (CBACT) is required. When construction-related emissions exceed 2.5 tons per quarter for fugitive dust (PM10), CBACT is required. In addition, fugitive PM10 mitigation measures are required when construction related PM10 exceeds the threshold.</p> <p>Based on the criteria in the Handbook, the Project is too small to trigger the Table 1-1 thresholds. However, the Handbook stresses the importance of applying mitigation measures to projects that will involve fugitive dust near sensitive receptors. The Handbook defines fugitive dust as "small particles which are entrained and suspended into the air by the wind or external disturbances. Fugitive dust typically originates over an area and not a specific point. Typical sources include unpaved or paved roads, construction sites, mining operations, disturbed soil and tilled agricultural areas." Also, the Handbook defines sensitive receptors as "people that have an increased sensitivity to air pollution or environmental contaminants. Sensitive receptor locations include schools, parks and playgrounds, day care centers, nursing homes, hospitals, and residential dwelling units. The location of sensitive receptors is needed to assess toxic impacts on public health."</p> <p>As the result of the Project, fugitive dust will be released that could impact HASLO clients and staff, which qualify as sensitive receptors. Therefore, as the County of San Luis Obispo is in non-attainment status for ozone and PM10 (fine particulate), the County shall implement Mitigation Measures M-2 through M-14, as applicable, to minimize nuisance impacts and to significantly reduce fugitive dust emissions.</p> <p>M-2. Reduce the amount of the disturbed area where possible.</p> <p>M-3. Use of water trucks or sprinkler systems in sufficient quantities to prevent airborne dust from leaving the site. Increased watering frequency would be required whenever wind speeds exceed 15 mph.</p>
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		<p>Reclaimed (non-potable) water should be used whenever possible.</p> <p>M-4. All dirt stockpile areas should be sprayed daily as needed.</p> <p>M-5. Permanent dust control measures identified in the approved project revegetation and landscape plans should be implemented as soon as possible following completion of any soil disturbing activities.</p> <p>M-6. Exposed ground areas that are planned to be reworked at dates greater than one month after initial grading should be sown with a fast germinating, non-invasive grass seed and watered until vegetation is established.</p> <p>M-7. All disturbed soil areas not subject to revegetation should be stabilized using approved chemical soil binders, jute netting, or other methods approved in advance by the APCD.</p> <p>M-8. All roadways, driveways, sidewalks, etc. to be paved should be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used.</p> <p>M-9. Vehicle speed for all construction vehicles shall not exceed 15 mph on any unpaved surface at the construction site.</p> <p>M-10. All trucks hauling dirt, sand, soil, or other loose materials are to be covered or should maintain at least two feet of freeboard (minimum vertical distance between top of load and top of trailer) in accordance with CVC Section 23114.</p> <p>M-11. Install wheel washers where vehicles enter and exit unpaved roads onto streets, or wash off trucks and equipment leaving the site, if any.</p> <p>M-12. Sweep courtyard and areas at the Project site at the end of each day if visible soil material is carried onto adjacent areas.</p>
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		<p>Water sweepers with reclaimed water should be used where feasible.</p> <p>M-13. All these fugitive dust mitigation measures shall be shown on grading and building plans.</p> <p>M-14. The contractor or builder shall designate a person or persons to monitor the fugitive dust emissions and enhance the implementation of the measures as necessary to minimize dust complaints, reduce visible emissions below 20% opacity, and to prevent transport of dust offsite. Their duties shall include holidays and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the APCD Compliance Division prior to the start of any grading, earthwork, or demolition.</p> <p>Asbestos The APCD implements the National Emission Standards for Hazardous Air Pollutants Regulation (NESHAP), and oversees compliance with asbestos containing building materials.</p> <p>The subject building, built in 1989 could have asbestos containing building materials as a ban on asbestos did not include commercial building, only in residences. Therefore, the Project site is not exempt from the NESHAP requirements for asbestos.</p> <p>The NESHAP defines the term demolition as “the wrecking or taking out” of any load-supporting structural member of a facility or the intentional burning of any facility. To determine if the Project is exempt from the NESHAP regulations, HASLO is required to call or e-mail the APCD for a determination.</p> <p>To comply with federal NESHAP requirements, HASLO must comply with the APCD requirements to a determination if the Project building is subject to NESHAP on asbestos. See Mitigation Measures M-15:</p> <p>M-15. HASLO shall contact the APCD for an exemption determination of the Project building. If the building is subject to the</p>
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		<p>asbestos NESHAP, HASLO must follow APCD guidance for a written notification of demolition and renovation to the APCD at least 10 working days prior to performing such work. This notification shall also include the asbestos inspection report that was prepared by a certified asbestos consultant and the appropriate fees. Both documents must be submitted whether asbestos is present. HASLO shall provide all documentation pertaining to the APCD's determination and compliance with NESHAP to the County Department of Planning and Building.</p> <p>M-16. The County of San Luis Obispo will incorporate the APCD requirements listed above in the CDBG-CV2 CARES Act contract agreement with HASLO and require the same mitigations be included in the Project's design plans to assure compliance during construction.</p> <p>Conclusion: With recommended construction mitigation measures, the Project will have a less than significant impact on air quality and comply with the local APCD requirements.</p>
<p>Coastal Zone Management</p> <p>Coastal Zone Management Act, sections 307(c) & (d)</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>According to the County of San Luis Obispo Department of Planning and Building's internal mapping application, called GeoView Mapper, the Project is not located within a Coastal Zone as defined in California's Coastal Management Plan. Therefore, this Project is compliant with the Coastal Zone Management Act. See Figure #15.</p>
<p>Contamination and Toxic Substances</p> <p>24 CFR Part 50.3(i) & 58.5(i)(2)</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The Project site is within proximity (5,280 feet) to one active Leaking Underground Storage Tank (LUST) site at 2816 Spring Street, located approximately 1,500 feet west of the Project site (Appy's Liquor). GeoTracker shows other LUST cleanup sites (completed) within a 1-mile radius of the Project site.</p> <p>GeoTracker Review of the Central Coast Regional Water Quality Control Board (RWQCB) records for the Appy's Liquor site identified a diesel fuel spill in 2010 which laterally spread on the site and a monitoring program commenced at that time. See Figure #16.</p>

		<p>Per the RWQCB records, after two years of monitoring and remediation at this site, the hydrocarbon concentrations declined to acceptable level and on July 7, 2021, the RWQCB completed and closed this case.</p> <p>Due to the size and limited area affected by the diesel fuel spill, the proposed Project site is not in danger of contamination from the Appy's Liquor site.</p> <p>EnviroStor A review of the California Department of Toxic Substances Control's EnviroStor database website did identify active toxic sites on or near the Project site. See Figure #17.</p> <p>EPA NEPAassist NEPAassist is a tool that facilitates the environmental review process and project planning in relation to environmental considerations. NEPAassist maps EPA facilities track and permit the use of hazardous waste materials, release air emissions, water discharges, toxic releases, identifies Superfund (CERCLIS) sites, brownfields, RADIinfo, and site subject to the Toxic Substances Control Act. These facilities are mapped individually or in clusters, due to multiple EPA permitted businesses operating near each other, called "cluster facilities." See Figure #18.</p> <p>A 3,000-foot radius search of the Project site using NEPAassist identified 13 cluster facilities as follows:</p> <p>EPA Facilities by Cluster</p> <ul style="list-style-type: none">  9 Hazardous Waste sites  0 Air Pollution site  4 Water Dischargers  0 Toxic Releases  0 Superfund (NPL) sites  0 Brownfields (ACRES)  0 Toxic Substances Control Act <p>13 Clusters</p> <p>In total, there are 24 businesses within the 13 cluster facilities which operate with an EPA permit. However, none of the sites appear in either GeoTracker or EnviroStor for sites with active leaks, spillage, or contamination.</p>
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		<p>The proposed Project is a remodel with minor new construction (ADA ramp), therefore will not impact or be impacted by contamination and toxic substance.</p> <p>No other sites were identified.</p>
<p>Endangered Species</p> <p>Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The City of Paso Robles and the North County area is in the San Joaquin kit fox habitat. However, the City of Paso Robles maintains an urban setting and the Project site is fully developed as is the surrounding properties to create an urban environment not suitable for kit fox habitat.</p> <p>The Project site is fully developed with four, two-story former motel buildings with establish and well-maintained landscaping and a large parking lot surrounding the buildings and historically, since 1989 when the site was developed, heavily used for both the tourism industry and now for housing and emergency shelter.</p> <p>The Project site is in an area fully developed with commercial and industrial uses to the north, west and south. Highway 101 is adjacent to the former motel site to the east.</p> <p>According to the City of El Paso de Robles General Plan 2003 Conservation Element identifies policies to help mitigate new development impacts on kit fox habitat. Policy C-3B: Sensitive Habitat: Incorporate habitats into project design, as feasible, including oak woodlands, native grasslands, wetlands, and riparian area.</p> <p>Action Item 1. As part of the environmental review of new development projects, the City would require biological studies and alternatives to habitat removal will be explores, and input will be sought from other public agencies with expertise in biological resources.</p> <p>Action Item 2. As part of the environmental review of new development projects, the City will require that mitigation for potential impacts to the San Joaquin Kit Fox and its habitat be provided in consultation with the CA Department of Fish and Game and the U.S. Fish and Wildlife Service.</p> <p>Prior to the December 2020 acquisition of the property by HASLO using Homekey Program funds, review of the proposed use change from motel to studio apartments/emergency shelter facility by the City of Paso Robles did not trigger special review or a permit. Consistent with the</p>

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		<p>city's zoning code, the new use at the facility is allowed by-right and was not subject to discretionary local permit review or approval process (Health and Safety Code, Sec. 50675.1.1(g) under city and state code.</p> <p>On May 9, 2021, staff conducted a site visit of the Project site. No special-status wildlife species or evidence of burrowing greater than 4 inches in diameter were observed during the visit.</p> <p>Due to the insubstantial change in use of the Project site, no excavation proposal, its urban setting, existing landscaping, the nature and location of the Project site, staff determination from a site visit, kit fox will not be impacted by the proposed Project.</p>
<p>Explosive and Flammable Hazards</p> <p>24 CFR Part 51 Subpart C</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>This Project does include the following activities: development, construction, and rehabilitation that will increase residential densities, or conversions near explosive and flammable hazards.</p> <p>A search of available databases such as the California Department of Toxic Substance Control's EnviroStor and the US Environmental Protection Agency's NEPAassist, and field observations combined with a review of online aerial imagery conducted by County staff, the Project site is not within a 1-mile radius of hazardous operations involving explosive or flammable fuels or chemicals.</p> <p>Staff noted via Google Earth several above-ground storage tanks located at a large industrial yard at 825 26th Street, located about 1,100 feet southwest of the Project site. The property is the Paso Robles Tank, Inc., a local manufacturer of large-scale stainless steel and carbon tanks.</p> <p>Staff noted several stainless-steel tanks at this facility in multiple stages of construction.</p> <p>However, staff did not note identify any above-ground storage tanks which could contain explosive or flammable materials at the facility, nor was this property identified in the above-mentioned databases.</p>

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		Therefore, there are no impacts associated with explosive and flammable hazards.
Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	According to the State of California's Department of Conservation's Important Farmland Finder, the Project is not located on farmland. The Project does not include new construction, acquisition of undeveloped land, or conversion of agricultural land. Therefore, there are not impacts related to farmlands. See Figure #19.
Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55	Yes No <input checked="" type="checkbox"/> <input type="checkbox"/>	<p>The Project site is located within a FEMA Special Flood Hazard Area according to FIRM #06079C0393G and #06079C0389G, effective on 11/16/021 (see Figure #10). The Project meets the definition of a Critical Action, as defined in 24 CFR Part 55.2(b) (3) (i) and is subject to the Eight-Step Decision-Making Process required by Executive Order 11988, Floodplain Management, and implemented by HUD regulations found at 24 CFR 55.20.(b), Subpart C, Procedures for Making Determinations on Floodplain Management.</p> <p>This process is required to determine the potential effect that this activity (the Project) in the floodplain will have on the human environment for the CDBG program under Title I of the Housing and Community Development Act of 1974 (PL 93-383).</p> <p>Eight-Step Decision-Making Process <u>Step 2</u></p> <p>Step 2 of the Eight Step Process requires the publication of a 15-day notice to consider an action in a 100-year floodplain or wetland and to receive comments on the Project proposal in the 100-year floodplain.</p> <p>The County published Notice #1 in the July 4, 2021, edition of The Tribune. The required 15 calendar day notice allowed for public comments until July 19, 2021. See Notice #1 in Attachment B: Eight-Step Decision-Making Process.</p> <p>The County did not receive public comments for Notice #1.</p> <p><u>Step 7</u></p> <p>This step requires the publication of a second notice to inform the public of the Project reevaluation results, Steps 3-6, in a determination</p>

		<p>that there is no practicable alternative to locating the proposed Project in the 100-year floodplain.</p> <p>The County published Notice #2 in the July 20, 2021, edition of The Tribune. The required 7 calendar day notice allowed for public comments until July 27, 2021. See Notice #2 in Attachment B: Eight-Step Decision-Making Process.</p> <p>The County did not receive public comments for Notice #2.</p> <p><u>Eight-Step Decision-Making Process</u> <u>Determination</u></p> <p>It is the County of San Luis Obispo's determination that there is no practicable alternative to locating a portion of or all the Project outside the Salinas River 100-year floodplain because:</p> <ol style="list-style-type: none"> 1. It is infeasible and impractical to relocate the homeless shelter to a property located outside the flood zone. This would significantly increase the project delays by several months or years. There is no guarantee that should another property be identified outside of a flood zone that other rehabilitation and code deficiencies will present themselves which would drive up the project costs and help prevent and reduce the spread of the pandemic. 2. Selection of an alternative project location outside of the floodplain would not alleviate the need for affordable housing and an emergency shelter nor combat COVID-19 nor to address the basic facility infrastructure upgrade needs at the Project site. 3. A "no action" plan would not resolve or improve the existing needs nor reduce the pandemic situation among the homeless population. 4. The proposed Project will provide a benefit to the homeless in the North County area by providing an isolation room for clients experiencing symptoms of the coronavirus. 5. The Project will not negatively impact existing development and would not facilitate additional development in the floodplain.
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		<p>MITIGATIONS</p> <p>M-17. <u>Preserving Lives:</u> In order to preserve lives, local law enforcement and the emergency broadcast system will implement an early warning system should flooding conditions arise. In addition to the warning system, law enforcement has an emergency evacuation and relocation plan.</p> <p><u>Evacuation Plan:</u> Prior to the completion of the Project, HASLO shall submit to the County an Evacuation Plan. The purpose of the Evacuation Plan is to avoid confusion and prevent injuries to personnel, clients, and visitors to the Project site.</p> <p>The Project building shall display an emergency evacuation plan. The plan shall consist of the building's flood plan with all rooms identified, evacuation route to all building exits. All residents will also be briefed on the location of the flood hazard area and evacuation plans upon placement. The plan shall also identify the building's second floor as an escape and protection area for flood survivors.</p> <p>The plan shall include but is not limited to the following criteria:</p> <ul style="list-style-type: none"> • Conditions that will activate the plan • A Chain of command • Emergency functions and who will perform them • Specific evacuation procedures, including routes and exists • Posting of evacuation routes and exists • Procedures for accounting for personnel, clients, and visitors • Equipment for personnel • Review the plan with workers. • Identify an area of higher ground at the property, including a building's second story or nearby location outside the flood zone
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		<ul style="list-style-type: none"> Accommodate clients and visitors to the designed areas of high ground followed up with procedures for accounting for personnel, clients, and visitors. <p>Note: The mitigation described in this document will be included in the Community Development Block Grant program subrecipient agreement as a contractual obligation by HASLO and said language is to be included in the Project design plans.</p> <p>Subject to the findings of the Environmental Review process under the National Environmental Policy Act and with regards to any comments or recommendations received, the proposed Project in an "AO" floodplain will be carried out.</p>
<p>Historic Preservation</p> <p>National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800</p>	<p>Yes No</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/></p>	<p>The proposed Project consists of the rehabilitation of a public facility building used for transitional housing and an emergency shelter facility. The subject property, acquired by HASLO on December 2, 2020, and the subject buildings were constructed in 1989. Prior to the acquisition, the property was used as a motel, owned by the Motel 6 company, the privately owned hospitality company of budget motels, until the acquisition.</p> <p>The County reviewed the 2014 City of El Paso de Robles Historic Preservation Program Historic Inventory for resources on or near the Project site. According to the inventory, the subject property is not listed in the inventory, nor does it contain historic resources.</p> <p>Also, the Project site does not contain unique architectural design elements as the motel design used a simple design for budgetary reasons to keep the room rates low.</p> <p>According to the Historic Resources Inventory, the nearest site identified by the Resources Inventory is the Paso Robles Event Center at 2198 Riverside Avenue which is on the grounds of the Mid-State Fair. The property includes a grandstand, several stages, and other fairground buildings and structures and is noted in the Resources Inventory's Eligible for Listing</p>

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		<p>(Status Code Description) as "Appears individually eligible for local listing." However, the Resources Inventory does not identify the Paso Robles Event Center building as being on the California nor the National Registers for historic buildings. The Event Center is located approximately 0.41 miles south of the subject site. See Figure #20.</p> <p>Due to no excavation at the Project site, the age of the facility (32 years old), and the lack of significant architectural features, review, and consideration by the State Historic Preservation Officer (SHPO) under Section 106 of the National Historic Preservation Act, was not triggered.</p> <p>Based on the information provided above, the proposed Project will not impact historic properties or cultural resources, pursuant to 36 CFR 800.4(d), and 36 CFR Part 800.5(b).</p> <p>No further action is required.</p>
<p>Noise Abatement and Control</p> <p>Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The Project is categorized as transitional housing and a homeless shelter. HUD considers both used as a public facility use which are not categorized as residential in nature.</p> <p>While the rehabilitation work occurs, the activities will temporarily increase but will cease after the rehabilitation work. No long-term noise from the proposed rehabilitation work will occur.</p> <p>Therefore, the Project does not involve a noise sensitive use such as a residential structure, school, hospital, nursing home, or library, therefore, compliance with this section is complete and no formal compliance steps or mitigation is required.</p>
<p>Sole Source Aquifers</p> <p>Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>According to the USEPA's Sole Source Aquifer mapping system, the nearest sole source aquifer is the Fresno Streamflow Source Zone which is located approximately 72 miles away from the proposed Project site. See Figure #21.</p> <p>The Project is compliant with Sole Source Aquifer requirements.</p>
<p>Wetlands Protection</p>	<p>Yes No</p>	<p>According to the National Wetland Inventory, the nearest wetlands located to the Project site is the</p>

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Executive Order 11990, particularly sections 2 and 5	<input type="checkbox"/> <input checked="" type="checkbox"/>	<p>Salinas Rivers (riverine) and associated freshwater forested/shrub wetland. The Salinas River and its associated forested/shrub wetland is approximately 807 feet east of the Project site, across Highway 101 and the City of Paso Robles Sewer Plant property. See Figure #22.</p> <p>The Project does not involve substantial improvements or excavation as defined in 24 CFR Part 55 to the above-mentioned wetland area nor will it impact on or off-site wetlands. The Project is compliant with Executive Order 11990.</p>
<p>Wild and Scenic Rivers</p> <p>Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>There are no federally designated National Wild and Scenic Rivers Act (NWSRA) area in or near San Luis Obispo County. The nearest such designated area is along the Sisquoc River in Santa Barbara County.</p> <p>At no point is the designated area, or any NWSRA area upstream, closer than 10 miles to any point in San Luis Obispo County. See Figure #23.</p>
ENVIRONMENTAL JUSTICE		
<p>Environmental Justice</p> <p>Executive Order 12898</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The proposed Project involves the rehabilitation of a property used for transitional housing and emergency shelter for the homeless in the City of Paso Robles and North County area.</p> <p>The Project will not contribute to the increased use or siting of industrial plants, waste dumps, toxic chemicals, brownfields, superfund sites nor is the City of Paso Robles subject to a disproportionate impact from one or more environmental hazards which may exist in the community. The City of Paso Robles is not subject, nor does it bear a disproportionate share of the negative environmental consequences resulting from one or more industrial, municipal, and commercial operations.</p> <p>Therefore, no adverse environmental impacts will be caused by the proposed action and complies with Executive Order 12898 and no formal compliance steps, or mitigation is required.</p>

Field Inspection (Date and completed by): A site visit on May 9, 2021, made by Tony Navarro from the County of San Luis Obispo confirmed the above discussions that there are no potential adverse impacts under each statutory category when implementing this project.

Summary of Findings and Conclusions:

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No impacts will be realized by the actions of the proposed project. Mitigation measure are set in place to comply with federal requirements as noted in this document.

Mitigation Measures and Conditions [40 CFR 1505.2(c)]

Summarize below all mitigation measures adopted by the Responsible Entity to reduce, avoid, or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements, and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

Law, Authority, or Factor	Mitigation Measure
<p>Flood Insurance: Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]</p>	<p>M-1. HASLO is required to provide proof of flood insurance to the County. HASLO is required to provide the proof of insurance to the County prior to the execution of the contractual agreement with the County of San Luis Obispo for the HCD/HUD CARES Act funds.</p>
<p>Clean Air Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93</p>	<p>M-2. Reduce the amount of the disturbed area where possible.</p> <p>M-3. Use of water trucks or sprinkler systems in sufficient quantities to prevent airborne dust from leaving the site. Increased watering frequency would be required whenever wind speeds exceed 15 mph. Reclaimed (non-potable) water should be used whenever possible.</p> <p>M-4. All dirt stockpile areas should be sprayed daily as needed.</p> <p>M-5. Permanent dust control measures identified in the approved project revegetation and landscape plans should be implemented as soon as possible following completion of any soil disturbing activities.</p> <p>M-6. Exposed ground areas that are planned to be reworked at dates greater than one month after initial grading should be sown with a fast germinating, non-invasive grass seed and watered until vegetation is established.</p> <p>M-7. All disturbed soil areas not subject to revegetation should be stabilized using approved chemical soil binders, jute netting, or other methods approved in advance by the APCD.</p> <p>M-8. All roadways, driveways, sidewalks, etc. to be paved should be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used.</p>

	<p>M-9. Vehicle speed for all construction vehicles shall not exceed 15 mph on any unpaved surface at the construction site.</p> <p>M-10. All trucks hauling dirt, sand, soil, or other loose materials are to be covered or should maintain at least two feet of freeboard (minimum vertical distance between top of load and top of trailer) in accordance with CVC Section 23114.</p> <p>M-11. Install wheel washers where vehicles enter and exit unpaved roads onto streets, or wash off trucks and equipment leaving the site, if any.</p> <p>M-12. Sweep courtyard and areas at the Project site at the end of each day if visible soil material is carried onto adjacent areas. Water sweepers with reclaimed water should be used where feasible.</p> <p>M-13. All these fugitive dust mitigation measures shall be shown on grading and building plans.</p> <p>M-14. The contractor or builder shall designate a person or persons to monitor the fugitive dust emissions and enhance the implementation of the measures as necessary to minimize dust complaints, reduce visible emissions below 20% opacity, and to prevent transport of dust offsite. Their duties shall include holidays and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the APCD Compliance Division prior to the start of any grading, earthwork, or demolition.</p> <p>M-15. HASLO shall contact the APCD for an exemption determination of the Project building. If the building is subject to the asbestos NESHAP, HASLO must follow APCD guidance for a written notification of demolition and renovation to the APCD at least 10 working days prior to performing such work. This notification shall also include the asbestos inspection report that was prepared by a certified asbestos consultant and the appropriate fees. Both documents must be submitted whether asbestos is present. HASLO shall provide all documentation pertaining to the APCD's determination and compliance with NESHAP to the County Department of Planning and Building.</p> <p>M-16. The County of San Luis Obispo will incorporate the APCD requirements listed above in the CDBG-CV2 CARES Act contract agreement with HASLO and</p>
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	<p>require the same mitigations be included in the Project's design plans to assure compliance during construction.</p>
<p>Floodplain Management</p> <p>Executive Order 11988, particularly section 2(a); 24 CFR Part 55</p>	<p>M-17. <u>Preserving Lives:</u> In order to preserve lives, local law enforcement and the emergency broadcast system will implement an early warning system should flooding conditions arise. In addition to the warning system, law enforcement has an emergency evacuation and relocation plan.</p> <p><u>Evacuation Plan:</u> Prior to the completion of the Project, HASLO shall submit an Evacuation Plan to the County. The purpose of the Evacuation Plan is to avoid confusion and prevent injuries to personnel, clients, and visitors to the Project site.</p> <p>The Project building shall display an emergency evacuation plan. The plan shall consist of the building's flood plan with all rooms identified, evacuation route to all building exits. All residents will also be briefed on the location of the flood hazard area and evacuation plans upon placement. The plan shall also identify the building's second flood as an escape and protection area for flood survivors.</p> <p>The plan shall include but is not limited to the following criteria:</p> <ul style="list-style-type: none"> • Conditions that will activate the plan • A Chain of command • Emergency functions and who will perform them • Specific evacuation procedures, including routes and exists • Posting of evacuation routes and exists • Procedures for accounting for personnel, clients, and visitors • Equipment for personnel • Review the plan with workers. • Identify an area of higher ground at the property, including a building's second story or nearby location outside the flood zone • Accommodate clients and visitors to the designed areas of high ground followed up with procedures for accounting for personnel, clients, and visitors.

Determination:

- This categorically excluded activity/project converts to Exempt, per 58.34(a)(12) because there are no circumstances which require compliance with any of the federal laws and authorities cited at

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§58.5. Funds may be committed and drawn down after certification of this part for this (now) EXEMPT project; OR

- This categorically excluded activity/project cannot convert to Exempt because there are circumstances which require compliance with one or more federal laws and authorities cited at §58.5. Complete consultation/mitigation protocol requirements, **publish NOI/RROF and obtain "Authority to Use Grant Funds"** (HUD 7015.16) per Section 58.70 and 58.71 before committing or drawing down any funds; OR
- This project is now subject to a full Environmental Assessment according to Part 58 Subpart E due to extraordinary circumstances (Section 58.35(c)).



Preparer Signature: _____ Date: 03/21/2022

Name/Title/Organization: Tony Navarro, Planner III, Dept. of Planning and Building

Responsible Entity Agency Official Signature:

DocuSigned by:
Xzandrea Fowler
7E8FD68D41444F4...

Date: 3/25/2022

Name/Title: Xzandrea Fowler, Planning Manager/Environmental Coordinator

This original, signed document and related supporting material must be retained on file by the Responsible Entity in an Environmental Review Record (ERR) for the activity/project (ref: 24 CFR Part 58.38) and in accordance with recordkeeping requirements for the HUD program(s).

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FIGURES

- Figure #1: Area Map**
- Figure #2: County Area Map**
- Figure #3: Vicinity Map**
- Figure #4: Aerial View of Project Site**
- Figure #5: Project Site Map**
- Figure #6: Driveway Approach View**
- Figure #7: View of Typical Former Motel Design and Façade**
- Figure #8: Project Homekey Proximity to Airport/Runway Clear Zone**
- Figure #9: Coastal Barrier Map**
- Figure #10: FIRMette for Project Homekey Site**
- Figure #11: EPA Nonattainment Areas for Ozone, 8-hour (2015 standard)**
- Figure #12: EPA Nonattainment Areas for PM10**
- Figure #13: EPA Lead (2008 Standard)**
- Figure #14: EPA Particulate Matter <2.5 microns (2006 Standard)**
- Figure #15: Coastal Zone Boundary Map**
- Figure #16: GeoTracker Sites**
- Figure #17: EnviroStor Sites**
- Figure #18: NEPAssist Sites**
- Figure #19: California Important Farmland Finder**
- Figure #20: City of Paso Robles' Historic Resources Inventory Site**
- Figure #21: Sole Source Aquifers**
- Figure #22: Wetlands Protection**
- Figure #23: Wild and Scenic Rivers**

ATTACHMENTS

- Attachment A: Site Photographs**
- Attachment B: Eight-Step Decision-Making Process**

List of Sources, Agencies and Persons Consulted (40 CFR 1508.9(b))

- U.S. Environmental Protection Agency NEPAssist Environ Mapper
[NEPAssist](#)
- U.S. Fish and Wildlife Service, Coastal Barrier Resources System Mapper
[Official CBRS Maps \(fws.gov\)](#)
- Federal Emergency Management Agency, Flood Map Service Center: FIRMette map
[FEMA Flood Map Service Center | Welcome!](#)

List of Sources, Agencies and Persons Consulted (40 CFR 1508.9(b)), continued:

- CEQA Air Quality Handbook, A Guide for Assessing the Air Quality Impacts for Projects Subject to CEQA Review, April 2021, San Luis Obispo County Air Pollution Control District
[Microsoft Word - CEQA Handbook 2012 v1.doc \(storage.googleapis.com\)](#)
- San Luis Obispo County GeoView – California Coastal Zone boundary
[Microsoft Word - CEQA Handbook 2012 v1.doc \(storage.googleapis.com\)](#)
- California Water Resources Control Board, GeoTracker
[GeoTracker \(ca.gov\)](#)
- California Department of Toxic Substances Control EnviroStor
[EnviroStor \(ca.gov\)](#)
- City of El Paso de Robles General Plan, 2003 Conservation Element
[General Plan - Conservation Element \(prcity.com\)](#)
- California Department of Conservation's Important Farmland Finder
[DLRP Important Farmland Finder \(ca.gov\)](#)
- City of El Paso de Robles Historic Preservation Program, 2014 Historic Inventory
[Historic Preservation Program | Paso Robles, CA \(prcity.com\)](#)
- U.S. Environmental Protection Agency Sole Source Aquifer Mapping System
[Sole Source Aquifers \(arcgis.com\)](#)
- National Wetland Inventory
[Wetlands Mapper \(fws.gov\)](#)
- National Parks Service's National Wild and Scenic Rivers Act
[Interactive Map of NPS Wild and Scenic Rivers - Wild and Scenic Rivers Program \(U.S. National Park Service\)](#)



Figure #1. Area Map: The map above depicts San Luis Obispo County and the location of the Project site, located at 1134 Black Oak Drive, Paso Robles, California.

Source: San Luis Obispo County GIS Viewer. 2021.

Date Obtained: March 3, 2021

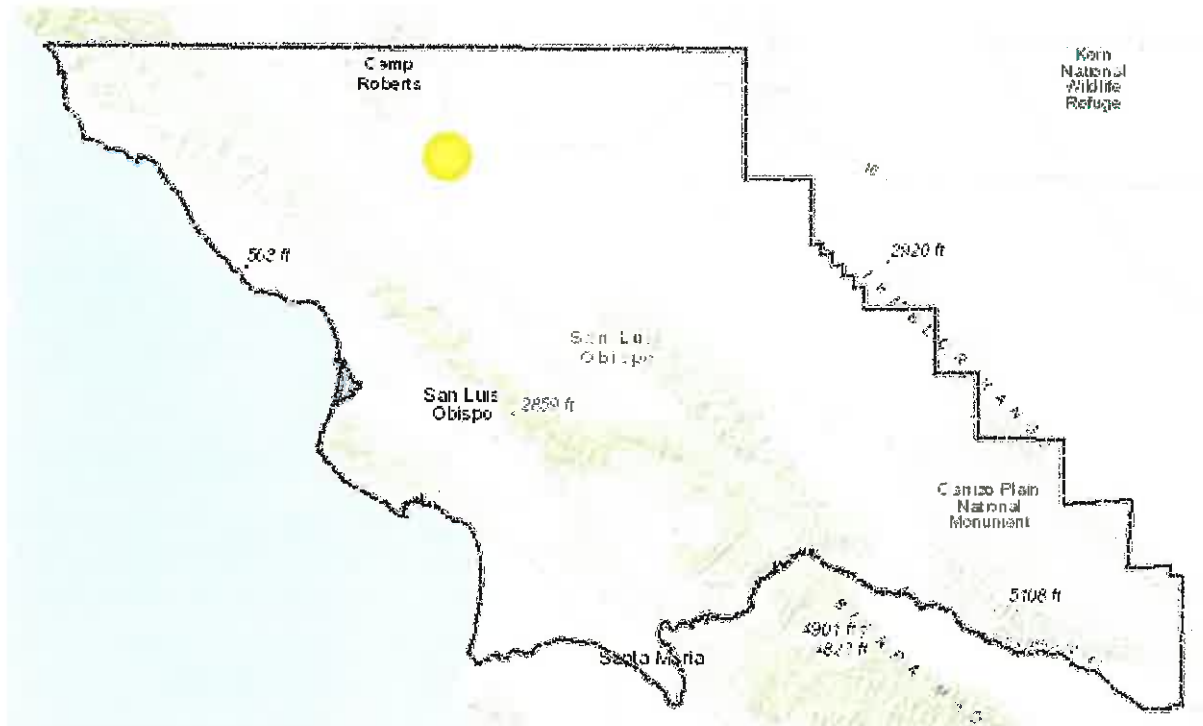


Figure #2. County Area Map: The map above depicts the location of the City of Paso Robles, relative to its location in San Luis Obispo County, where the Proposed Project is located.

Source: San Luis Obispo County GIS Viewer. 2021.

Date Obtained: March 3, 2021

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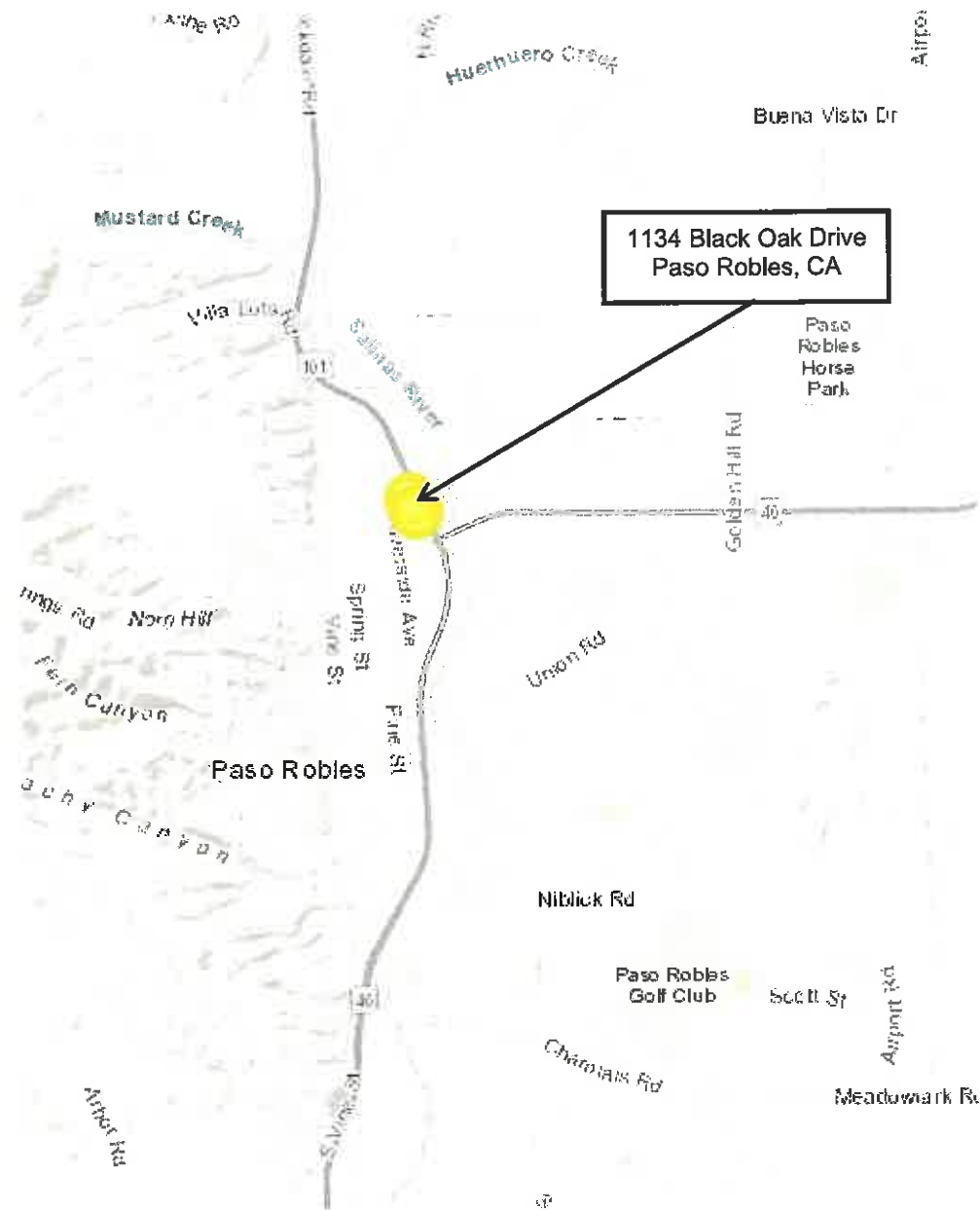


Figure #3. Vicinity Map: The Project site is located within the City of Paso Robles, California.

Source: San Luis Obispo County GIS Viewer. 2021.

Date Obtained: March 3, 2021



Figure #4. Aerial View of Project Site: The Project site is located within the City of Paso Robles, California and adjacent properties and land-uses.



Source: Google Earth
Date Obtained: May 4, 2021

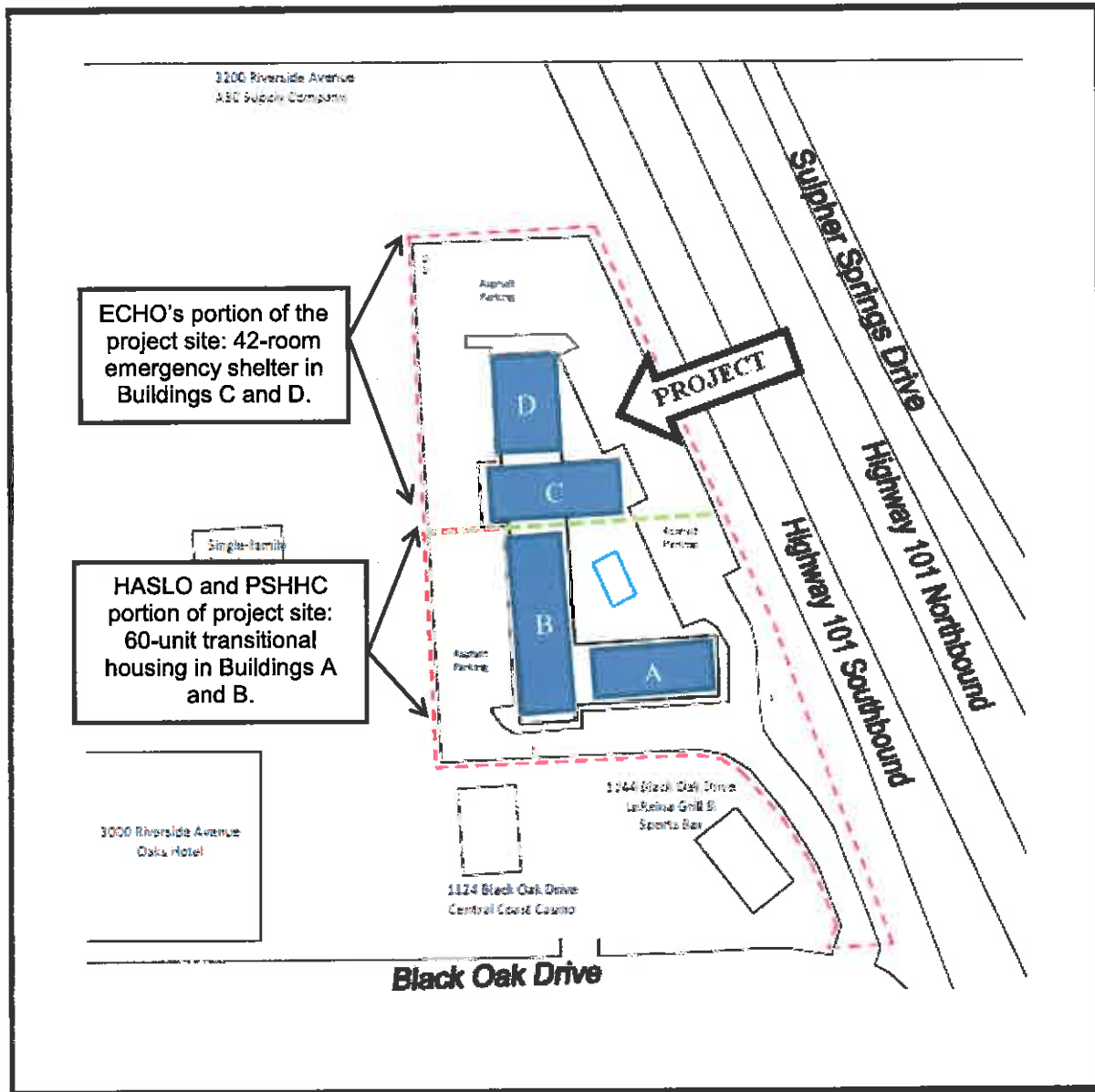


Figure #5. Project Site Map: The Project proposes to rehabilitate the 60-unit transitional housing (Buildings A and B) and 42 emergency shelter non-congregate room facility (Buildings C and D), located at 1134 Black Oak Drive, Paso Robles, CA.

Source: Google Earth
Date Obtained: March 4, 2021



Figure #6. Driveway Approach View. Pictured above the southernmost elevation of the Project site.

Source: Tripadvisor.com ([MOTEL 6 PASO ROBLES - Prices & Reviews \(CA\) - Tripadvisor](#)), March 3, 2021.



Picture 1: Picture of the east elevation of the Project site. These former guest rooms were turned into office space for the operation of the emergency shelter.

Photograph by Laura Dickinson, The Tribune News

Source: [Paso Robles CA Motel 6 homeless shelter opens to clients | San Luis Obispo Tribune, The Tribune News.com, March 4, 2021](#)



Picture 2: Picture of the east elevation of the Project site. These rooms along this breezeway were converted into intake areas.

Photograph by Laura Dickinson, The Tribune News

Source: [Paso Robles CA Motel 6 homeless shelter opens to clients | San Luis Obispo Tribune, The Tribune News.com, March 4, 2021](#)

Figure #7. View of Typical Design and Façade of the facility.

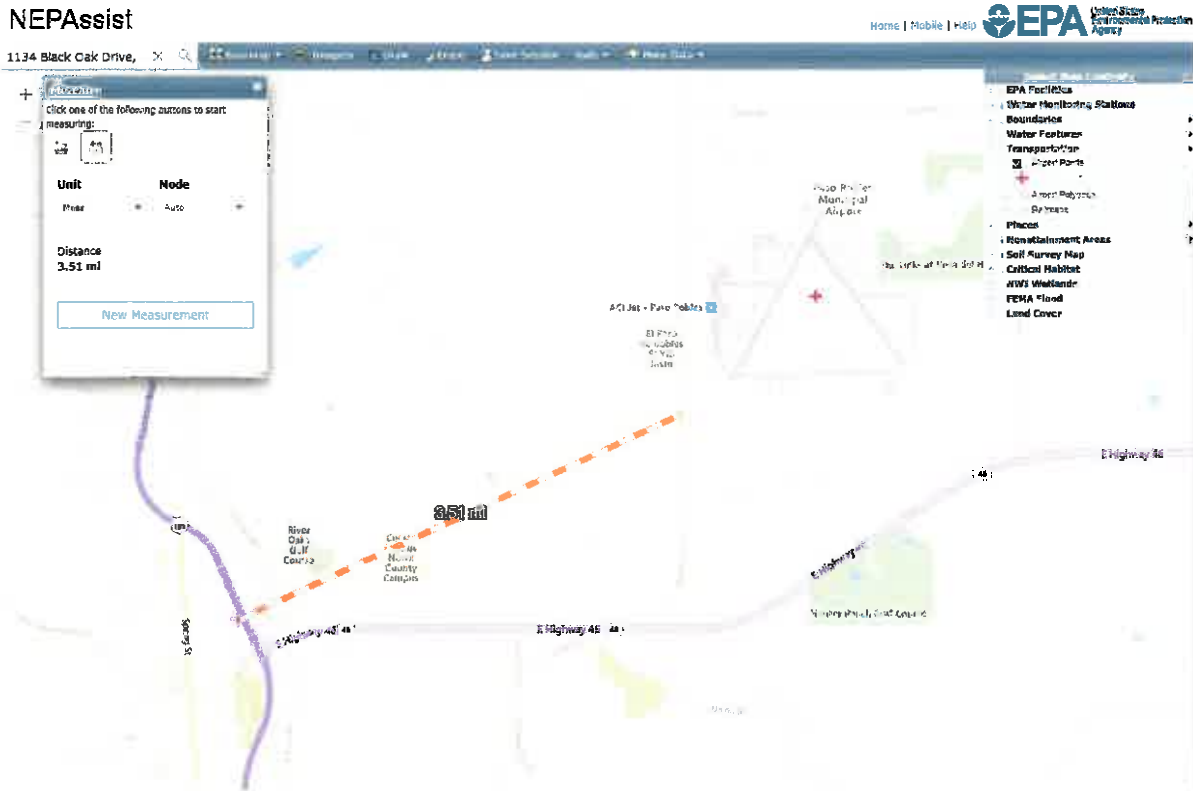


Figure #8: Project Homekey Proximity to Airport/Runway Clear Zone

The nearest airport to the Project site, the Paso Robles Municipal Airport, is located 3.51 miles to the northwest.

Source: [NEPAAssist](#)
Date: July 28, 2021

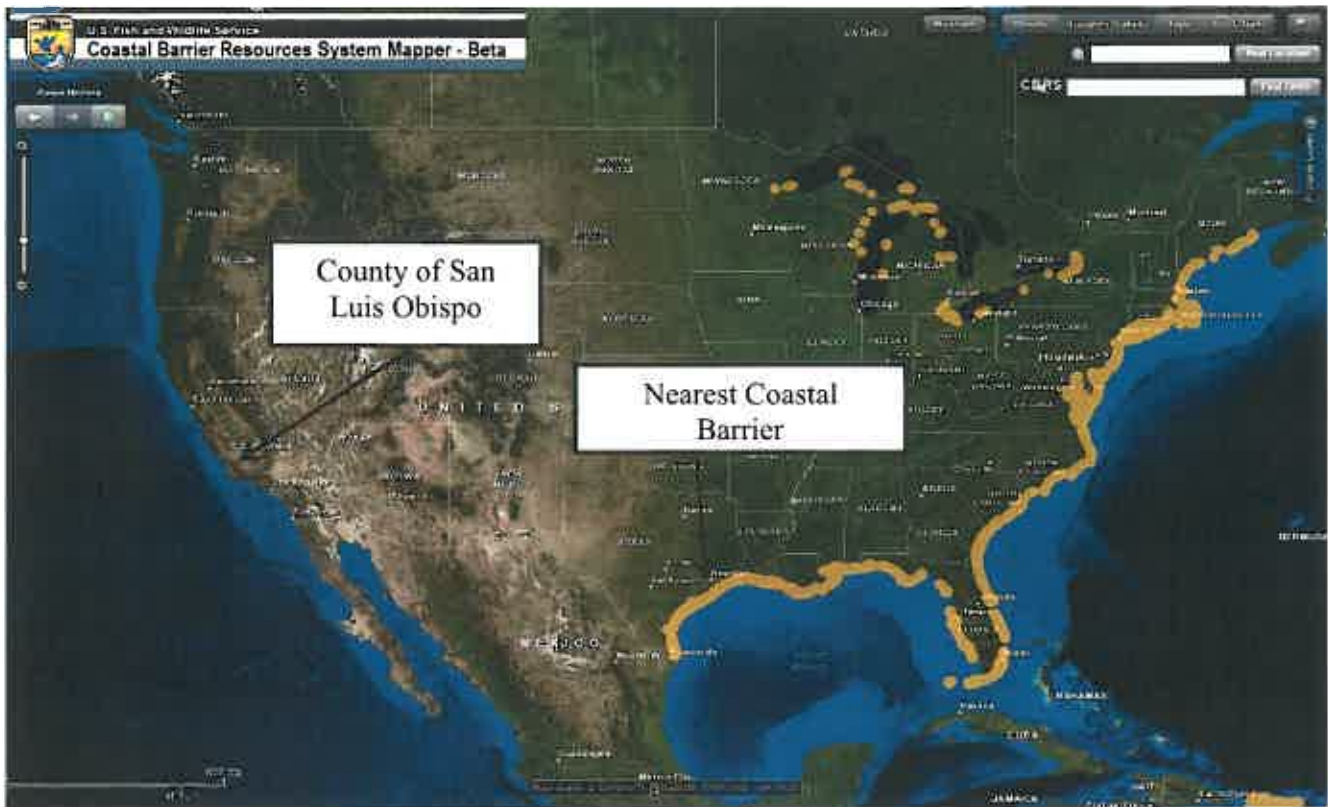


Figure #9: Coastal Barrier Map

The U.S. Fish and Wildlife Services does not identify any coastal barriers along the California coast.

Source: U.S. Fish and Wildlife Service, Coastal Barrier Resources System Mapper-Beta. [CBRS Mapper \(fws.gov\)](http://fws.gov)

Date Obtained: June 30, 2017

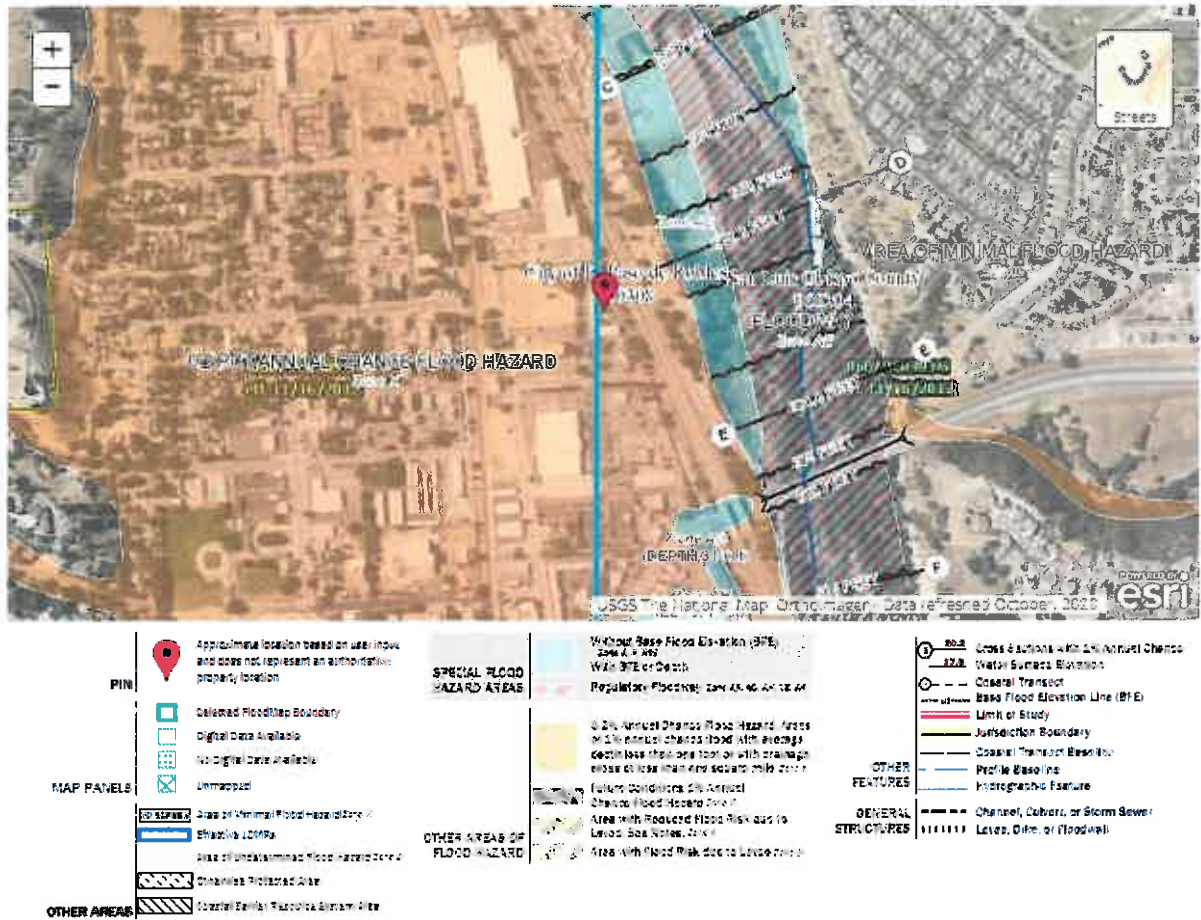


Figure #10: FIRMeta for Project Homekey Site

Source: Flood Hazard Map # 06079C0389G and #06079C0393G, Effective Date: 11/16/2012
 Federal Emergency Management Agency. Flood Map Service Center.

Source: [FEMA Flood Map Service Center | Search By Address](https://www.fema.gov/flood-map-service-center)

Date Obtained: March 18, 2021

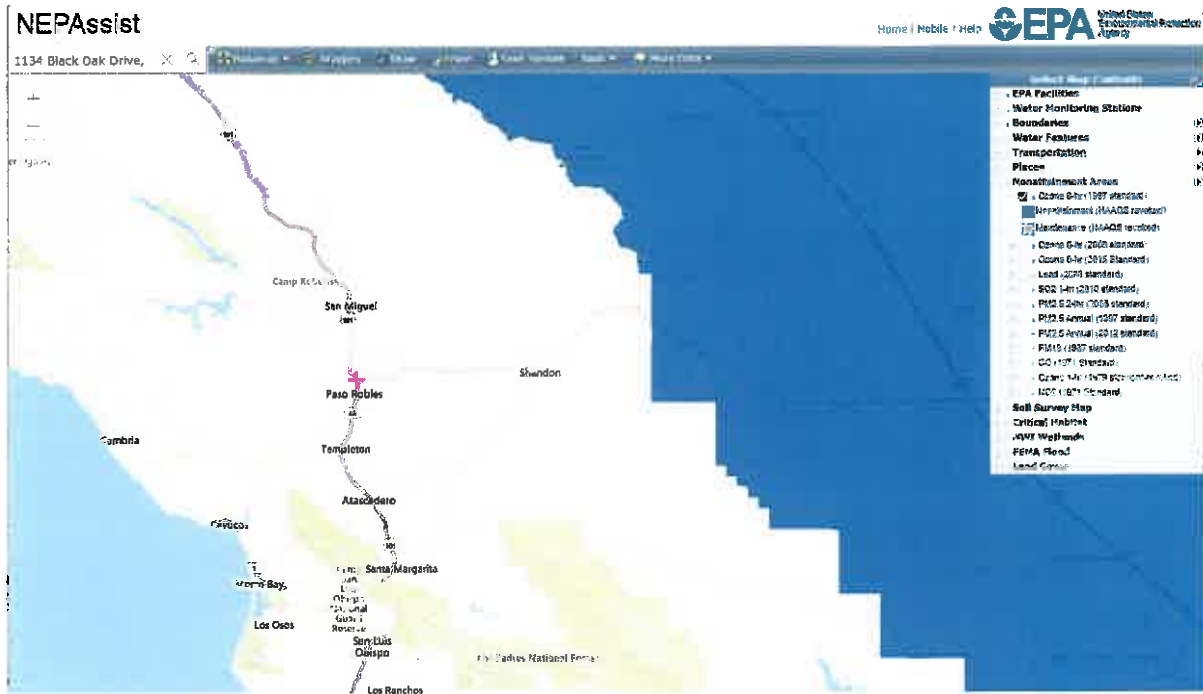


Figure #11: EPA Nonattainment Areas for Ozone, 8-hour (2015 standard). Area in blue in eastern portion of the County is the nonattainment zone, while the remainder of the County, including the City of Paso Robles) fall within the attainment area.

Source: [NEPAAssist](#)
Obtained: August 3, 2021

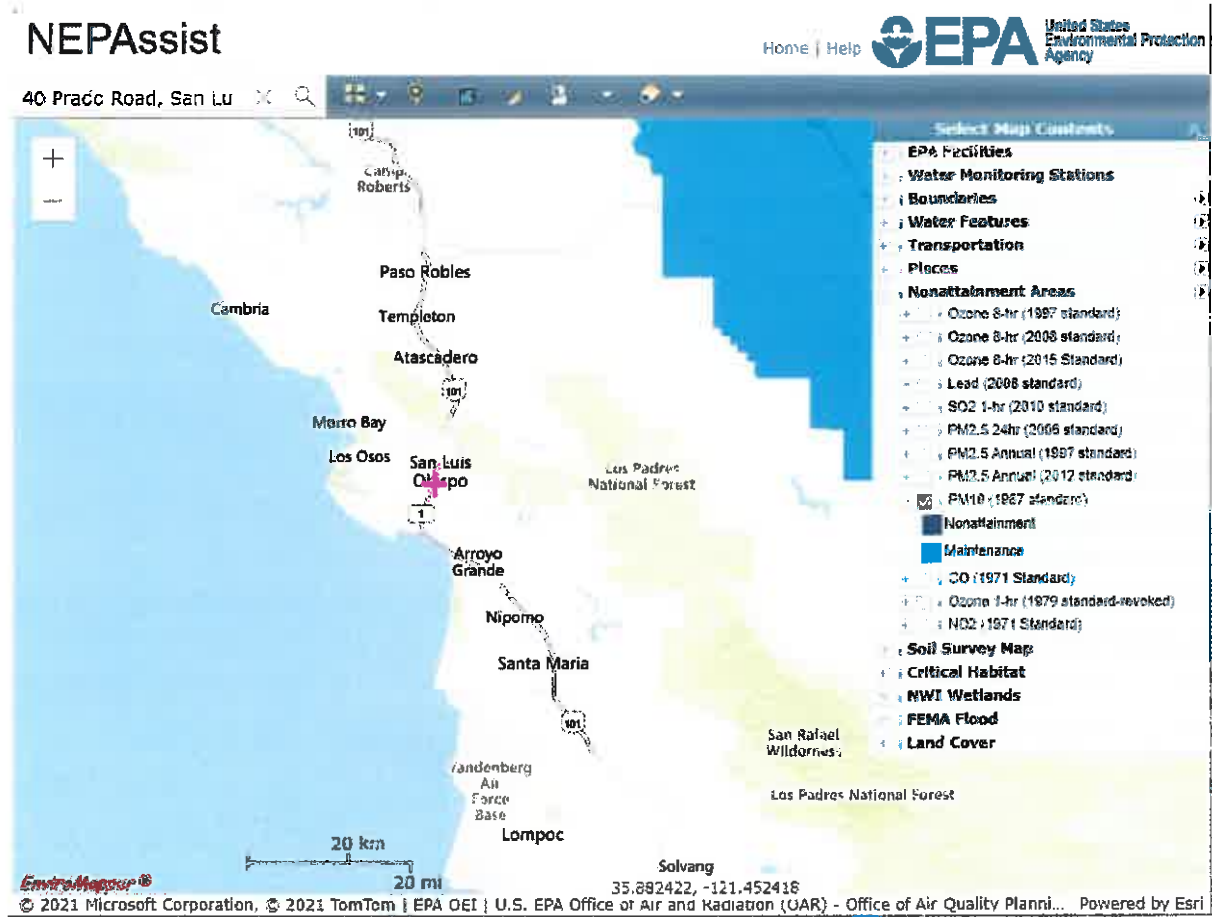


Figure #12: EPA Nonattainment Areas for PM10

The blue area, east of San Luis Obispo County is the nonattainment zone, while ALL the County, including the City of San Luis Obispo, falls within the attainment area.

Source: <https://nepassisttool.epa.gov/nepassist/nepamap.aspx>

Obtained: April 16, 2021

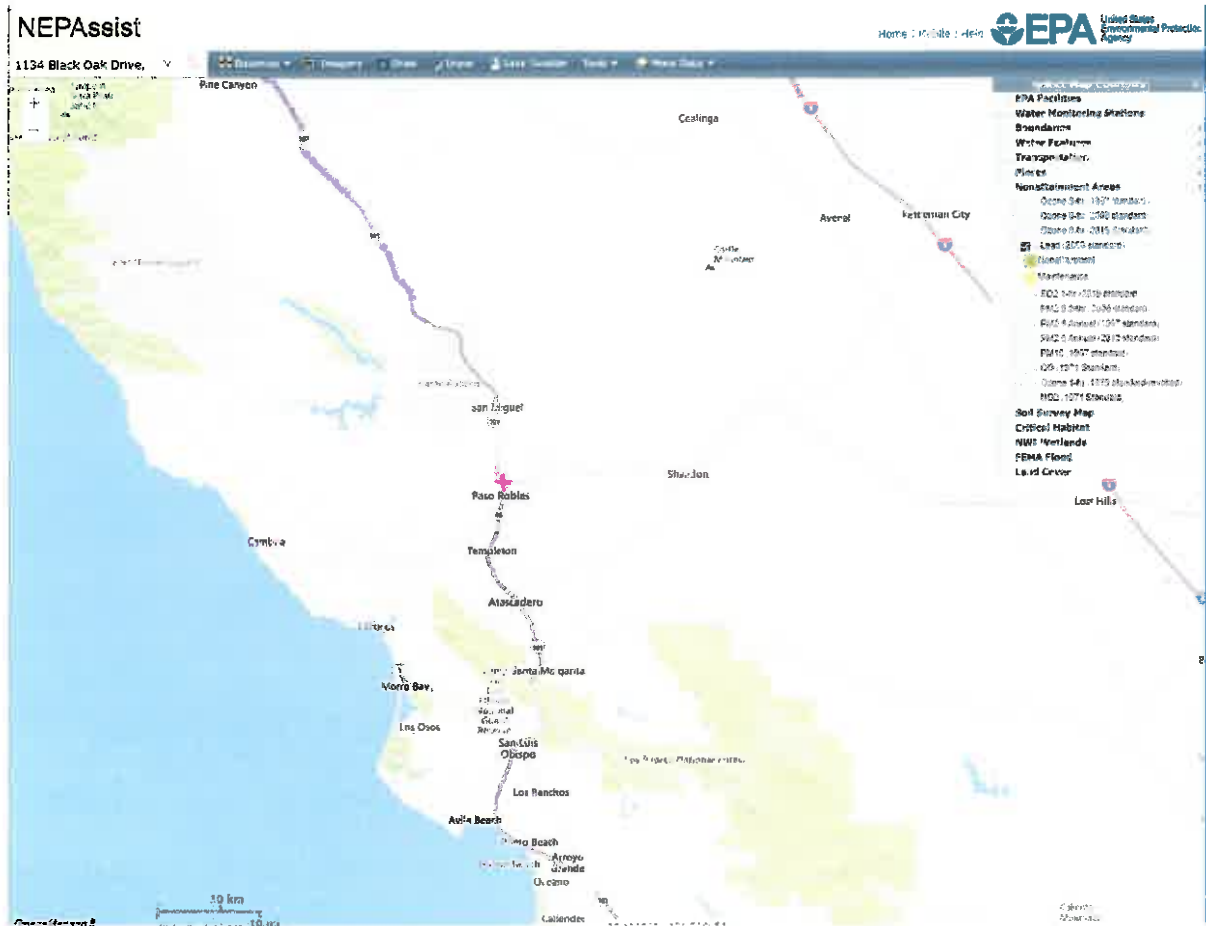


Figure #13: EPA Lead (2008 Standard)
San Luis Obispo County is in an attainment zone for lead, including the City of Paso Robles.

Source: <https://nepassisttool.epa.gov/nepassist/nepamap.aspx>
Obtained: August 3, 2021

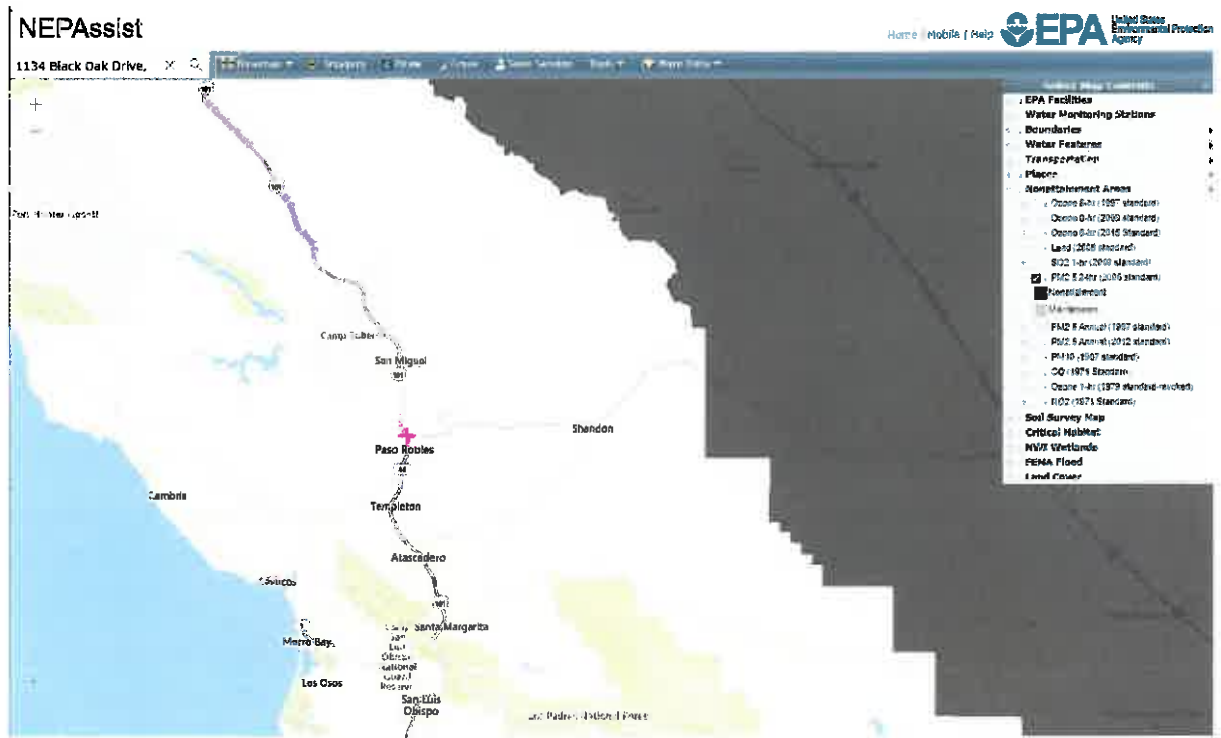


Figure #14: EPA Particulate Matter <2.5 microns (2006 Standard)
San Luis Obispo County is in an attainment zone for particulate matter, including the City of Paso Robles.

Source: <https://nepassisttool.epa.gov/nepassist/nepamap.aspx>

Obtained: August 3, 2021

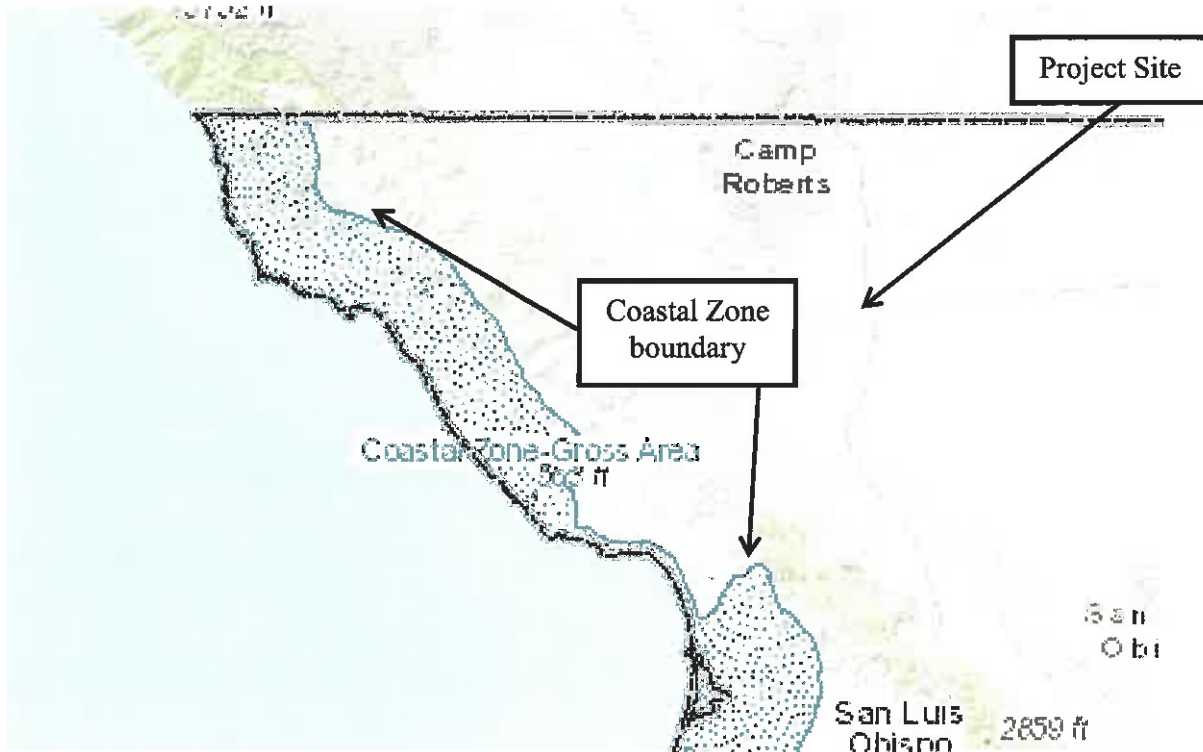


Figure #15: Coastal Zone Boundary Map

The following map depicts the Project site outside of the California Coastal Zone boundary as mapped by the County of San Luis Obispo Department of Planning and Building.

Source: San Luis Obispo County GeoView - [GeoView \(slo.ca.us\)](http://GeoView(slo.ca.us))

Obtained: May 12, 2021

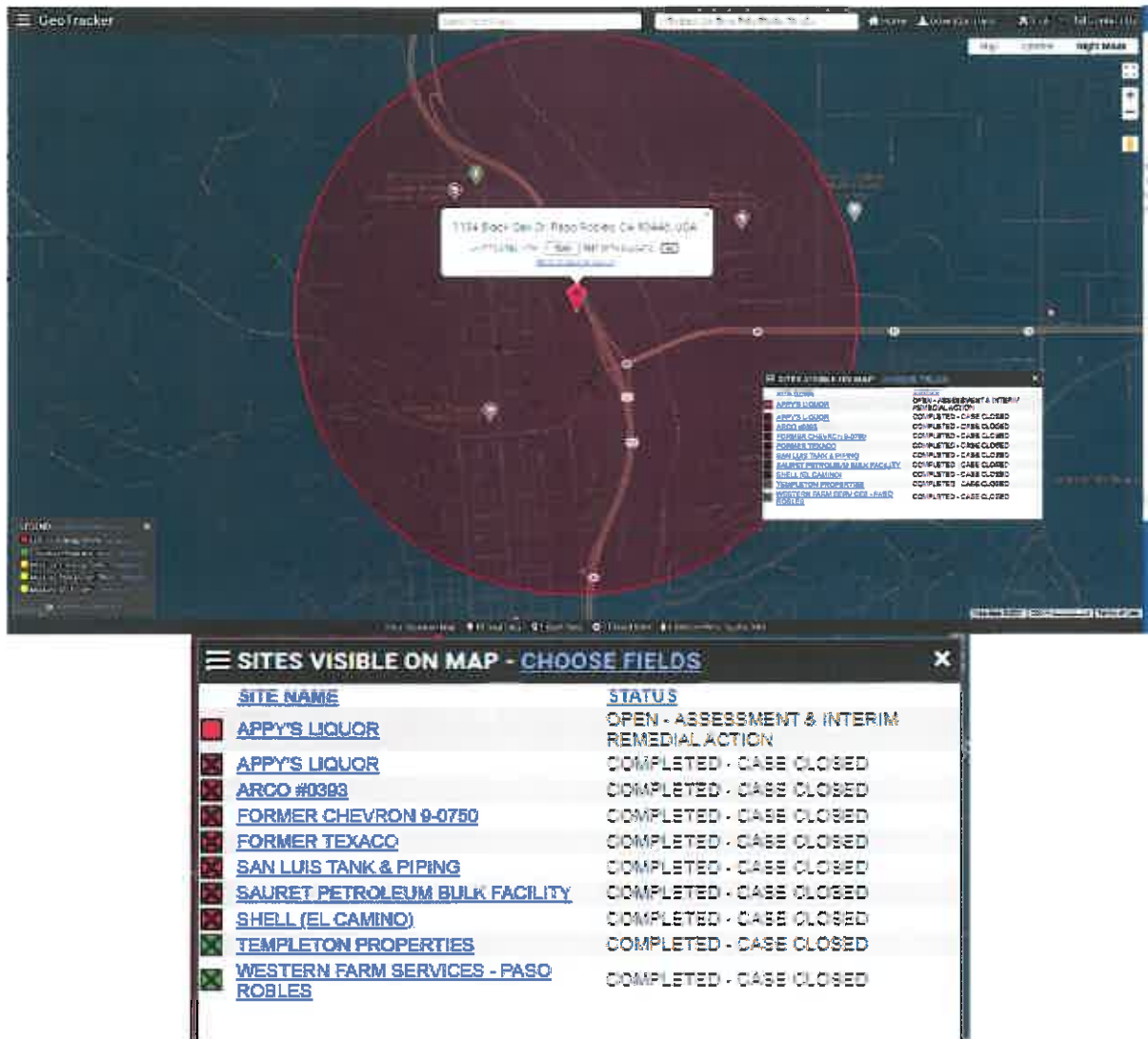


Figure #16: GeoTracker Sites

The GeoTracker database identified multiple closed or completed sites within a 3,000-foot radius of the Project site. See red and green boxes above for closed or completed cases.

Source: [GeoTracker \(ca.gov\)](http://GeoTracker.ca.gov)

Obtained: March 31, 2021

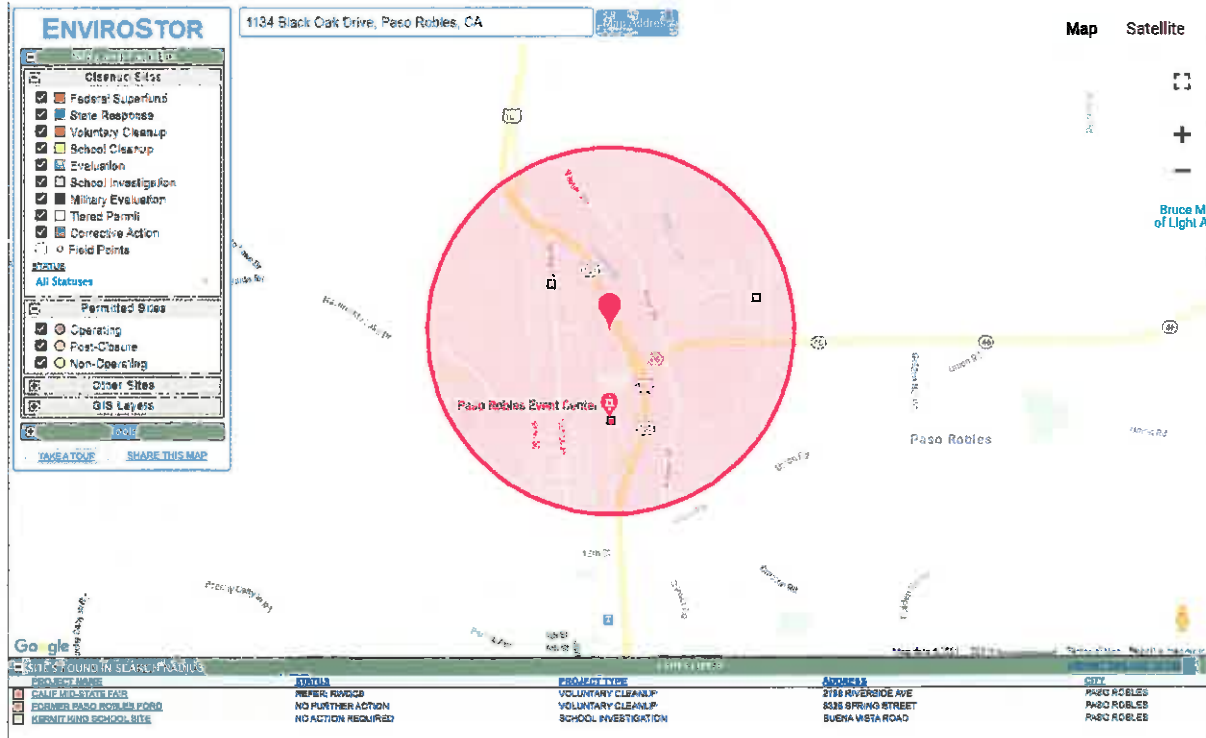


Figure #17: EnviroStor Sites

The EnviroStor database identified one active site, Cal Mid-State Fair, a 1995 voluntary cleanup case at 2198 Riverside Avenue. The Central Coast RWQCB closed this Project and closed two other sites within a 3,000 radius of the Project site.

Source: EnviroStor Database: [EnviroStor Database \(ca.gov\)](http://EnviroStor Database (ca.gov))

Obtained: March 31, 2021

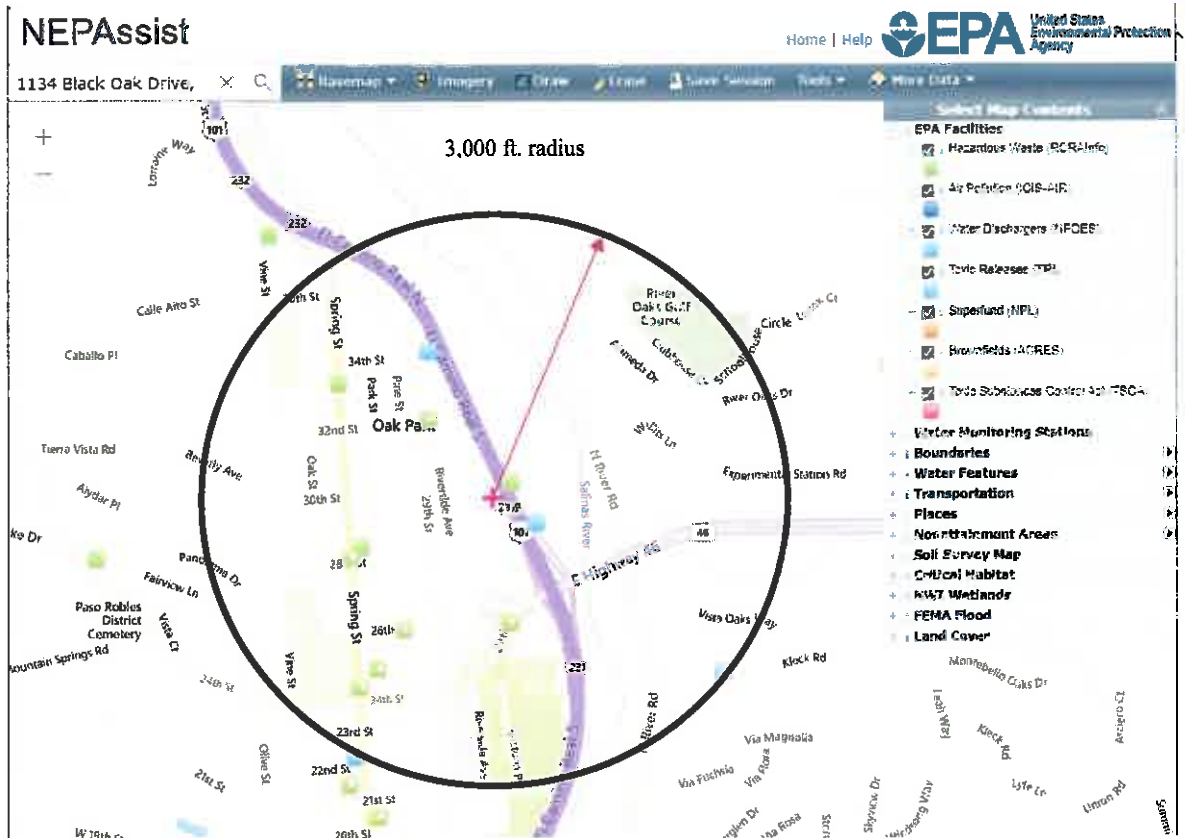


Figure #18: NEPAssist Sites

NEPAssist identified 13 clusters of properties permitted for use of some form of hazardous materials but no sites are identified as contaminated or spillage occurring within the 3,000-foot radius of the Project site.

Source: EPA NEPAssist Database: <http://nepassisttool.epa.gov/nepassist/nepamap.aspx>

Obtained: April 21, 2021

- 9 Hazardous Waste sites
- 0 Air Pollution site
- 4 Water Dischargers
- 0 Toxic Releases
- 0 Superfund (NPL) sites
- 0 Brownfields (ACRES)
- 0 Toxic Substances Control Act (TSCA)

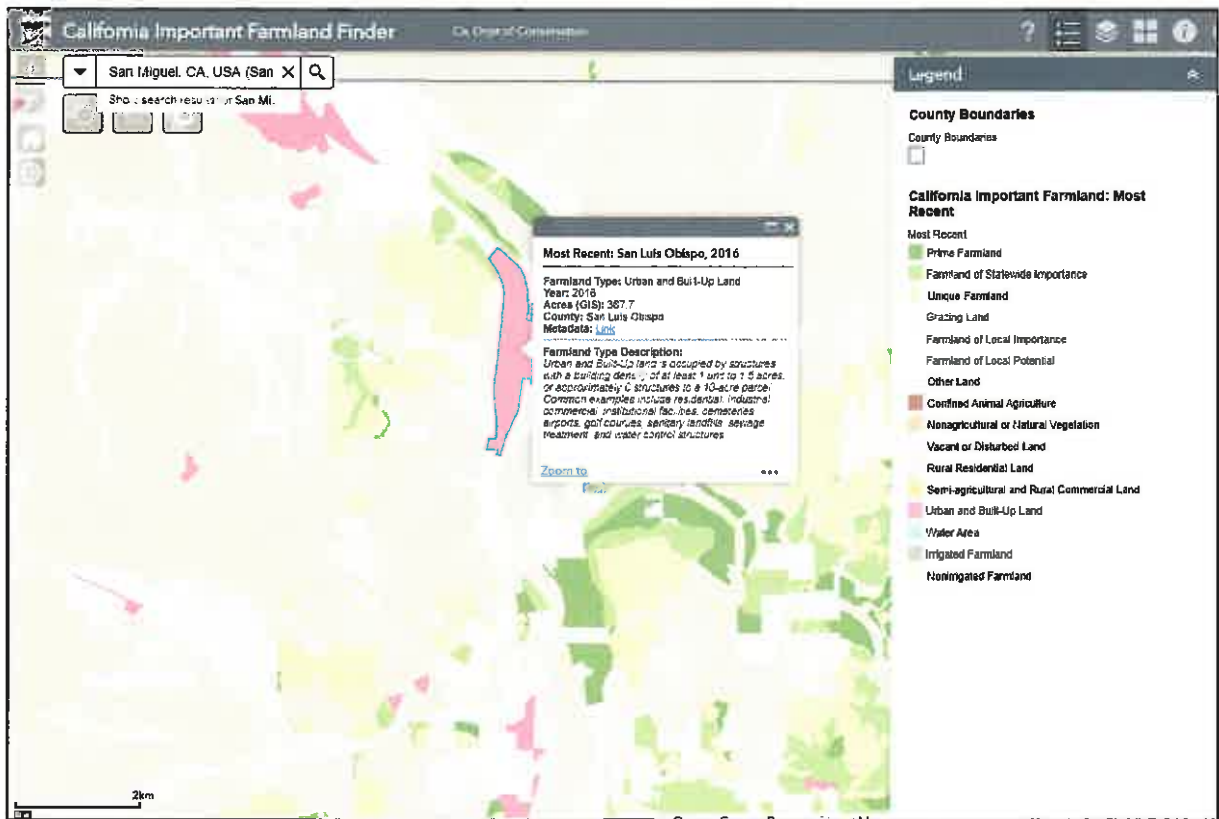


Figure #19: California Important Farmland Finder

Project site is in Urban and Built-Up Land category and not on agricultural land.

Source: maps.conservation.ca.gov: [DLRP Important Farmland Finder \(ca.gov\)](https://maps.conservation.ca.gov/DLRP/ImportantFarmlandFinder/)

Obtained: April 13, 2021



Figure #20: City of Paso Robles' Historic Resources Inventory Site
Project site distance from Event Center (2198 Riverside Avenue at the Mid-State Fairgrounds).
The Project site is located 0.41 miles north of the Event Center in Paso Robles., CA.

Source: Google Earth

Date Obtained: March 5, 2021

**Figure #21: Sole Source Aquifers**

The County of San Luis Obispo does not have a sole source aquifer. According to the USEPA's Sole Source Aquifer mapping system, the nearest sole source aquifer is the Fresno Streamflow Source Zone, in Fresno County, which is located approximately 72 miles away from the proposed Project site.

Source: United States Environmental Protection Agency, Region 9 Sole Source Aquifers:
<https://epa.maps.arcgis.com/apps/webappviewer/index.html?id=9ebb047ba3ec41ada1877155fe31356b>



Figure #22: Wetlands Protection

The Proposed Project is near but not adjacent to the Salinas River and its freshwater emergent wetland. The Project will not impact this resource.

Source: National Wetlands Inventory ([Wetlands Mapper \(fws.gov\)](http://Wetlands Mapper (fws.gov)))

Date obtained: April 6, 2021



Figure #23: Wild and Scenic Rivers

The Sisquoc River in Santa Barbara County is the nearest designed Wild and Scenic River. The proposed Project will not impact this resource.

Source: United States Department of Agriculture, Forest Service:

<https://www.rivers.gov/rivers/sisquoc.php>

Date obtained: April 15, 2021

ATTACHMENT A – SITE PHOTOGRAPHS



Rear building Elevation



Parking stalls and driveway



Parking area and swimming pool



Typical view of breezeway

Exterior Pictures and Grounds:

Source: Housing Authority of the City of San Luis Obispo

Project Homekey

HASLO

CARES Act CDBG-CV2



Typical landscaping



Typical landscaping



View of the swimming pool/patio area



View of swimming pool

Exterior Pictures and Grounds:

Source: Housing Authority of the City of San Luis Obispo

Project Homekey

HASLO

CARES Act CDBG-CV2



Motel guestroom finishes



Motel guestroom finishes



Motel guestroom finishes



Motel guestroom finishes

Interior Pictures (typical room)

Source: Housing Authority of the City of San Luis Obispo

Project Homekey

HASLO

CARES Act CDBG-CV2

ATTACHMENT B – EIGHT-STEP DECISION-MAKING PROCESS

**PROJECT HOMEKEY TO REHABILITATE TRANSITIONAL
STUDIO APARTMENTS AND AN EMERGENCY SHELTER
FACILITY**

1134 Black Oak Drive, Paso Robles, CA

Attachment B

County of San Luis Obispo

Department of Planning and Building

Eight-Step Decision-Making Process

2019 CARES Act CDBG-CV2 Program Funds

**PROJECT HOMEKEY TO REHABILITATE TRANSITIONAL STUDIO APARTMENTS AND AS AN
EMERGENCY SHELTER FACILITY
1134 Black Oak Drive, Paso Robles, CA
DOCUMENTATION OF COMPLIANCE WITH**

**Executive Order 11988 – Floodplain Management
Title 24 – Housing and Urban Development
Part 55 – Floodplain Management**

Subpart C - Procedures for Making Determinations on Floodplain Management

Sec. 55.20 Decision making process

The decision-making process for compliance with this part contains eight steps, including public notices and an examination of practicable alternatives. The steps to be followed in the decision-making process are:

(a) Step 1. Determine whether the proposed action is located in a 100-year floodplain (or a 500-year floodplain for a critical actions) or result in new construction in a wetland. If the action does not occur in a floodplain or result in new construction in a wetland, then no further compliance with this part is required.

The former motel property, hereinafter referred to as the "Project," located at 1134 Black Oak Drive, in the City of Paso Robles is situated within Zone X, of the Salina River 500-year flood zone, per FIRM #06079C0393G and #06079C0389G (effective on 11/16/2012). See Exhibit #1: Federal Emergency Management Agency's Flood Insurance Rate Map #06079C039G and #0607C0389G (effective date of November 16, 2012).

The County of San Luis Obispo plans to apply for CARES Act Community Development Block Grant (CDBG-CV2) program funds on behalf of the Housing Authority of the City of San Luis Obispo, ("HASLO"), as administered by the California Department of Housing and Community Development ("HCD") from the U.S. Department of Housing and Urban Development (HUD).

The Project proposes to use federal CARES Act funds (CDBG-CV2) administered by HCD for interior and exterior alterations, excluding excavation to the grounds, for critical infrastructure replacements, such as roof repairs, replacing the outdated plumbing, electrical upgrades, and life and safety enhancements. The proposed scopes of work also include items to increase the functionality and living experience for the residents as follow:

- Roof Repair.
- Temporary Relocation.
- Plumbing Submeter.
- Plumbing Upgrade.

- Electric Upgrades and Submeter.
- Permanent Housing Kitchen Upgrades; Bathroom Remodel.
- Food Preparation Area - Interim Housing.
- Security cameras.
- Fire Sprinklers & Water Filter System.
- ECHO - External Storage / Lockers.
- ECHO - Furniture/Fixtures.
- Fitness Equipment.
- Interior Painting.
- Irrigation Upgrade.
- Additional Stairways/staircase to second floor for egress.
- Professional Services - Architecture/Consultants/Permit Fees; and
- Administration Costs - 7%.

The property, co-owned by HASLO and Peoples' Self Help Housing Corporation (PSHH), will operate the transitional housing portion of the property, while the emergency shelter portion of the property will be operated by the El Camino Homeless Organization (ECHO).

The Project meets the definition of a Critical Action, as defined in 24 CFR Part 55.2(b) (3) (i), which means:

"Any activity for which even a slight chance of flooding would be too great, because such flooding might result in loss of life, injury to persons, or damage to property".

Although the Project property is not solely used to house people who may not be sufficiently mobile to avoid loss of life, as described in 24 CFR Part 55.2 (b) (3) (i) (C), it is possible that the facility will shelter at one point in time homeless persons who are elderly or who may have a disability that are less mobile than others.

24 CFR Part 55.2 (b) (3) (i) (C) states:

"Critical actions include activities that create, maintain or extend the useful life of those structures or facilities that:

(C) Are likely to contain occupants who may not be sufficiently mobile to avoid loss of life or injury during flood or storm events, e.g., persons who reside in hospitals, nursing homes, convalescent homes, intermediate care facilities, board and care facilities, and retirement service center".

The Project meets the definition of a Critical action and therefore, must comply with the decision-making steps per 24 CFR Part 55.20.

(b) Step 2. Notify the public and agencies responsible for floodplain management or wetlands protection at the earliest possible time of a proposal to consider an action in a 100-year floodplain (or a 500-year floodplain for a Critical Action) or wetland and involve the affected and interested public and agencies in the decision-making process.

(1) The public notices required by paragraphs (b) and (g) of this section may be combined with other project notices wherever appropriate. Notices required under this part must be bilingual if the affected public is largely non-English speaking. In addition, all notices must be published in an appropriate local printed news medium, and must be sent to federal, state, and local public agencies, organizations, and, where not otherwise covered, individuals known to be interested in the proposed action.

(2) A minimum of 15 calendar days shall be allowed for comment on the public notice.

(3) A notice under this paragraph shall state: the name, proposed location and description of the activity; the total number of acres of floodplain involved; and the HUD official and phone number to contact for information. The notice shall indicate the hours and the HUD office at which a full description of the proposed action may be reviewed.

See Attachment A – Notice #1 on page 25 of this document.

A 15-day public notice concerning the Project was published in the San Luis Obispo Tribune newspaper on July 4, 2021, to provide the public with sufficient information early in the decision-making process concerning a floodplain. The Tribune is the local and regional newspaper for the San Luis Obispo County area, including the City of Paso Robles where the Project is located. A notice was not prepared in Spanish as the population within the City of Paso Robles and surrounding areas are not predominately Spanish speaking. Also, attached is a copy of The Tribune's affidavit for the notice that appeared in newspaper.

The required 15 calendar days were allowed for public comment through July 19, 2021, at 5:00 PM, the last day to accept comments. As required by regulations, the notice also included the name, proposed location and description of the activity, and the responsible entity contact for information as well as the location and hours of the office at which a full description of the proposed action can be viewed.

The County did not receive public comments for Notice #1.

(c) Step 3. Identify and evaluate practicable alternatives to locating the proposed action in a 100-year floodplain (or a 500-year floodplain for a Critical Action) or wetland.

(1) The consideration of practicable alternatives to the proposed site or method may include:

- (i) Locations outside and not affecting the 100-year floodplain (or 500-year floodplain for a Critical Action) or wetland;**
- (ii) Alternative methods to serve the identical project objective, including feasible technological alternatives; and**
- (iii) A determination not to approve any action proposing the occupancy or modification of a floodplain or wetland.**

(2) In reviewing practicable alternatives, the Department or a grant recipient subject to 24 CFR Part 58 shall consider feasible technological alternatives, hazard reduction methods and related mitigation costs, and environmental impacts.

The Project is proposed in a former Motel 6 property. The motel was constructed in 1989 and continued as a motel until December 2020 when the property was sold to HASLO and PSHH with the assistance of California's Homekey Program, the state's response to protecting Californians experiencing homelessness who are at high risk of serious illness. The Project proposes using federal funds to rehabilitate the transitional housing and emergency shelter facility, was converted into 60 units of transitional housing units by installing kitchenettes and converting 42 units as non-congregate emergency shelter sleeping quarters.

At the time of the motel acquisition, a process which did not involve the use of federal funds, the site location of the Project to an alternative location outside of Zone X of the Salinas River's 500-year flood zone, per FIRM #06079C0393G and #06079C0389G was not considered. However, project alternatives must be considered for the rehabilitation of the facility in this process for federal assistance.

(1)The Consideration of practicable alternatives to the proposed site or method may include:

- (i) Locations outside and not affecting the 100-year (or 500-year floodplain for a Critical Action) or Wetland**

Prior to HASLO's involvement in the Project, PSHH and ECHO searched for properties in the City of Paso Robles to acquire using State of California Project Homekey funds. Project Homekey is the state's response to protecting persons experiencing homelessness who are at high risk for serious illness and are impacted by COVID-19.

Project Homekey focused on the purchase and rehabilitation of housing, hotels, motels, vacant apartment buildings, and other buildings and convert them into interim or transitional, long-term housing. The HASLO/PSHH Project Homekey received about \$16 million to acquire the subject property.

During the property search PSHH and ECHO concentrated its search in the City of Paso Robles for a motel or an apartment building. These older properties are in the old section of the City of Paso Robles on the first terrace overlooking the Salina River, specifically between the Salina River and the abutting hillside (east to west), and along Spring Street which runs north and south along the length of the old section of the city. See Exhibit #2: FEMA Flood Insurance Rate Maps for the Western Portion of the City of Paso Robles

Due to its geography and proximity to the Salinas River, nearly all the City of Paso Robles, located west of the Salinas River, is within the 100-year or 500-year floodplain per the FEMA FIRM maps (see Exhibit #2). As most of western Paso Robles is located within the 500-year floodplain, feasible alternatives sites located outside of a floodplain are limited or do not exist due to the local geography.

List of Alternative Sites Considered During Property Search

The following sites were available for sale at the time HASLO, PSHH, and ECHO analyzed the properties as potential alternative to acquire. A licensed real estate broker at the PSHH Real Estate Acquisitions Manager, analyzed the following properties in 2020.

- 416 Spring Street: Community Health Center Building
- 2508 Spring Street, Retail/Office Building
- 2748 Spring Street: Bowling Alley
- 3231 Spring Street: Avalon Motel
- 3548 Spring Street: Wine Country Inn
- 1134 Black Oak Drive: Motel 6

416 Spring Street - Community Health Center Building: The property is less than an acre in size (0.88 acre) and is used as a medical office building not suited for residential nor for emergency shelter. Potential to build additional square footage is limited due to acreage and zoning does not allow shelter use.

2508 Spring Street - Retail/Office Building: The property is less than an acre in size (0.5 acre) and contains retail and office space that would impact local businesses. The property, formerly known as the Mission Plaza, is also not suited for residential nor for emergency shelter. Potential to build additional square footage is limited due to acreage and zoning does not allow shelter use.

2748 Spring Street – former bowling alley: While this property is larger at 1.53 acres, the former bowling alley center building is not suite for residential and emergency shelter and the city's zoning does not allow emergency shelter use. However, this 17,000 square foot building is vacant, for sale, but future development to create additional square footage is questionable and not likely due to the expanse of the building on the property and would eliminate needed parking space.

3231 Spring Street – Avalon Motel: This is the site of a former 24-unit motel but with no potential. PSHH reached out to the owners but the property was not available for sale. Also, the current zoning does not allow emergency shelter use.

3548 Spring Street – Wine Country Inn: This is a 15-unit motel with about 1/3 of an acre. Potential to build additional housing and emergency shelter is not allowed by the zoning code.

1134 Black Oak Drive – Motel 6: This former motel with 200 guest rooms contains ample square footage to accommodate many transitional housing units and a site for an emergency shelter facility with ample parking and acreage, 2.47 acres, to accommodate the needs of both facilities.

Relocation

The first and obvious effective technique is to simply relocate the building or purchase a new building outside the floodplain. For new construction, this can be accomplished by avoiding building within the floodplain. However, for existing buildings located in the floodplain, the shelter could be raised and relocated to a property outside the floodplain.

The relocation option is not feasible due to the recent purchase of the property in December 2020 using the state Project Homekey funds.

For HASLO to consider relocating the proposed Project to a site outside of a flood zone is not a financially feasible alternative. This alternative would require additional property searches outside of the City of Paso Robles which have the required zoning, lot size, accommodations, and location which is accessible to the homeless of the North County area.

While it is likely there are properties in the City of Paso Robles located outside a flood zone which could accommodate transitional housing and a homeless shelter, with proximity to bus and other services, the alternative would require significant financial efforts by HASLO, PSHH and ECHO to relocate their facility. For example, relocating the facility will require a significant investment in relocation costs, the establishment of a capital campaign program, including the local permitting process, if applicable.

The State of California, who awarded the Homekey Program funds, also needs to approve the sale of the property, and transfer the sale proceeds to acquire a new site. The new location will likely require modifications to accommodate the specific needs for a dual-purpose facility to comply with building codes for transitional housing and as a homeless shelter, including ADA improvements (furniture/fixtures, etc.), with similar modifications already proposed by the Project.

In addition, most of the homeless in the North County area, especially in the City of Paso Robles, live in encampments in the Salinas Riverbed, subject to periodic flooding during the Winter and Spring months. Relocating the shelter/transitional housing would require the homeless to travel further from services and housing available at the Project site and away from services and facilities accessible in the city's downtown.

- (ii) Alternative methods to serve the identical project objective, including feasible technological alternatives

Building Elevation

An alternative proposal is to elevate the building 1 foot above the base flood elevation. According to the U.S. Geological 15-minute topographic map, the building's elevation above sea level is between 700 to 710 feet. The Salinas Riverbed is approximately 682 feet above sea level. Per the FIRM #06079C0393G and #06079C0389G maps, the 500-year flood zone extends west of the Project site to the base of the hills overlooking the City of Paso Robles, to the 750-760-foot elevation.

For the Project building, and all other properties located west of the Salinas River, to accomplish this feat would require raising their building site to the 750-760 (+1 foot above the Base Flood Elevation, or BFE) foot elevation.

Raising the building above the BFE does not present a feasible or practical alternative nor would other considerations, such as flood proofing the building, as flood levels exceed the building's height. Building a raise foundation or raising the building 1 foot above the BFE is not a feasible or particle alternative if the entire western portion of the City of Paso Robles is in the 500-year flood zone.

Dry Floodproofing

Wet or dry floodproofing can reduce the risk of flood damage. Dry floodproofing techniques essentially make the building watertight by adding sealants to the walls, shields to the openings, and secondary drainage and pumps to remove the water that seeps inside the building. This technique is good for concrete or masonry construction with low levels of flooding but requires significant levels of maintenance.

The Project site building was not constructed using concrete or masonry materials which make this technique less possible and infeasible to dry floodproof the building. Also, if the City of Paso Robles floods to the 750-760-foot elevation, the Project building would be entirely underwater in the event of a 500-year flood event which impacts the entire wester half of the City of Paso Robles.

Permanent Barriers

The last flood resistant building technique is to place a permanent barrier around the structure to prevent flood waters from reaching it. This can be done with a floodwall constructed of concrete or masonry, or using a levee constructed of compacted layers

of soil with an impervious core. Both floodwalls and levees do require significant maintenance. In addition, levees will require significant amount of land as well as usable soil materials to construct them.

Common types of floodwalls are gravity, cantilever, buttress, and counterfort. Building a floodwall around the structure to hold back floodwaters is another technique at a potential cost of \$120/linear foot (1998 cost for a non-California/DBA project*) that would deem the project infeasible when you consider the potential cost to encircle the subject property (approximately 1,700 linear feet based on staff's estimate), estimated at \$204,000 minimum as a non-prevailing wage job.

*Louisiana State University Agricultural Center, Louisiana Cooperative Extension Services, "Floodwall," by Pat Skinner, Disaster Programs Coordinator, Publication 2745, July 1999. (<https://www.lsuagcenter.com/NR/rdonlyres/7A01F7C8-705B-47D1-8CCD-63CDDA57721F/2995/pub2745Floodwalls6.pdf>) ([sheetsFlo \(lsuagcenter.com\)](https://www.lsuagcenter.com))

(iii) A determination not to approve any action proposing the occupancy or modification of a floodplain or wetland

A no action alternative was considered and rejected because of the urgent need to house homeless persons in the North County area and the Project property requires extensive rehabilitation work. Also, avoiding, or postponing work within the flood zone will not bring the Project property into compliance with current federal law pertaining to access to its clients. Also, the Project meets the definition of a critical action per the federal regulations (24 CFR Part 55.2(b) (3)).

A no action alternative would continue to see the use of the property as transitional housing and a shelter not compliant with current building code requirements and with ADA laws and in the flood zone.

(2) In reviewing practicable alternatives, the Department, or a grant recipient subject to 24 CFR Part 58 shall consider feasible technological alternatives, hazard reduction methods and related mitigation costs, and environmental impacts.

The result of the examination of alternatives listed above show that the proposed Project is a viable alternative as proposed and not result further impacts the flood zone. The Project will not have a detrimental effect on water quality or impair the wildlife habitat values as the development already exists and the proposed Project will not extend beyond its current footprint.

While the "no project" proposal is an alternative for discussion, current conditions are unlikely to continue due to federal requirement imposed through HASLO to comply with Section 8 housing standards.

The prior considerations, 1) locations outside and not affecting the 100- or 500-year floodplain, and 2) alternative methods to serve the identical project objective, are not feasible alternatives as the associated costs will be a burden to the Project.

- There are no other site selection criteria for an alternative project site because:
- The Project is a pre-existing use, consistent with the City of Paso Robles' land-use regulations;
- The Project proposes to upgrade the Project building to current Section 8 Housing Standards;
- The Project must comply with Section 8 Housing Standards, the California Building Code requirements as adopted by the City of Paso Robles; and
- The Project must comply with the Americans with Disabilities Act of 1990.

As part of this evaluation, HASLO must consider the City of Paso Robles' policies and programs which affect the Project. According to the City's Safety Element, goals and policies for emergency preparedness and flooding events are as follow:

City of El Paso de Robles General Plan 2003 – Safety Element

The County of San Luis Obispo obtained the following information from the City of El Paso de Robles General Plan 2003 Safety Element to help address the city's goals, policies, and action items to protect the community from risks associated with fires, flood, geologic hazards, and other phenomena that put lives and property at risk. Technical supporting data can be found both in the Safety Element Technical Appendix and the portions of the San Luis Obispo County Safety Element that pertain to the Paso Robles area.

1.0 Goals, Policies, and Action Items

GOAL S-1: Minimize exposure to natural and manmade hazards.

POLICY S-1A: Hazard Education. Continue to inform the public about hazards, hazard avoidance, and disaster response.

Action Item 1. Distribute informational handouts.

Action Item 2. Support volunteer training aimed at assisting police, fire, and civil defense personnel during and after a major earthquake, fire, or flood.

Action Item 4. Support the Department of Emergency Services' Weed Abatement Program to remove all combustible vegetation from yards or larger land parcels to reduce fire hazard.

POLICY S-1B: Disaster Response. Review/Update the community-wide Multi-Hazard Emergency Response Plan on a periodic basis.

◆ Addresses heavy search and rescue, major medical response, hazardous material response, interim morgue, emergency shelter, traffic and utility impacts, and debris removal and disposal; and

◆ Identifies procedures for access, traffic control, emergency evacuations, and security of damaged areas.

Action Item 1. Maintain Mutual and Automatic Aid Agreements with regional fire prevention and law enforcement agencies.

Action Item 2. Review/Update the Emergency Services Growth Management Plan on a periodic basis.

POLICY S-1D: Structural Safety. Rely on the City's planning and building permit review process to ensure that existing and proposed structures are adequately designed, and to reduce susceptibility to damage from fire, flooding, and geologic hazards.

Action Item 1. Review and update, as necessary, the City's Building Security & Construction Standards for new development projects to address:

- Exterior Lighting;
- Surveillance devices;
- Illuminated street numbering;
- Locking devices for doors;
- Pedestrian safety devices;
- City Security Plan requirements; and
- City requirements/standards to incorporate considerations related to safety and defensibility into project design and site layout.

Action Item 3. Require structures identified as being located in hazardous areas to be brought into conformance with acceptable levels of risk.

2.0 Safety Issues

The residents of the City of Paso Robles are subject to a variety of natural and human-caused hazards. Natural hazards are processes such as earthquakes, landslides, flooding, and wildfires.

2.3 Flood Hazard

This section contains information regarding flood hazards for the City of Paso Robles. The Federal Emergency Management Agency (FEMA) defines flooding as, the rising and overflow of a body of water, submerging of two or more acres of normally dry land that is not normally covered by water (FEMA Definitions). Potential hazards for Paso Robles include riverine flooding, also known as overbank flooding due to excessive rainfall, and localized flooding. Localized flooding may occur outside of recognized drainage channels or delineated floodplains due to a combination of locally heavy precipitation, increased surface runoff, and inadequate facilities for drainage and stormwater conveyance (LHMP, page 4-13). The Paso Robles area is subject to flood hazards from the Huerhuero Creek, Dry Creek, the Salinas River floodplains, and their tributaries. This has the potential to occur in events where runoff is too great for the system, or the storm water system is disrupted by vegetation or other debris causing excess water to remain on the surface.

Flood Hazard Zones

The City of Paso Robles participates in the Federal Emergency Management Agency (FEMA) National Flood Insurance Program and consults with the Department of Water Resources (DWR) Division of Flood Management, for support in obtaining the most current floodplain mapping information. This information includes Flood Insurance Rate Maps (FIRMs) that identify regulated flood hazard zones, which are then used to assign risk and insurance rates for homeowners and businesses.

Non-regulatory maps published by DWR containing floodplain information include, Awareness Floodplain Maps, Best Available Maps (BAM), Levee Flood Protection Zone (LFPZ) maps, and the Central Valley Floodplain Evaluation and Delineation (CVFED) maps. Only FIRMs and DWR Awareness Floodplain maps have been prepared for the area of the City of Paso Robles (FEMA 2012; DWR 2012).

Flood Insurance Rate Maps

Flood hazard zones are defined as an area subject to flooding that is delineated as either a special hazard area or an area of moderate or minimal hazard according to the FIRMs issued by FEMA. This designation, however, does not imply that areas outside the flood hazard zones or uses permitted within flood hazard zones will be free from flooding or flood damage.

The 2012 FIRMs for San Luis Obispo County identify two floodplain zones in Paso Robles for 100-year and 500-year flood events:

- **Zone A:** 1 percent annual chance of flood hazard area. This area includes the floodplains of Huerhuero Creek, Dry Creek, and the Salinas River.
- **Zone B:** 0.2 percent annual chance of flood hazard area. Floodplain boundaries for the 500-year flood include the northwest area of the City to the west of the Salinas River and east of the Salinas River between Creston Road to the south and Union Road to the north.

Flood Control Projects

The Paso Robles Downtown Watershed Management Plan (DWMP) identifies areas within the City's downtown core that experience flooding during moderate to large storm events. The goal of the DWMP is to utilize a watershed planning approach to manage runoff and address existing drainage issues by reducing localized flooding and improving water quality of storm water runoff prior to discharge to the Salinas River or its tributaries.

Regional storm water management projects will be combined with Capital Improvement Projects (CIP) within the DWMP to effectively and efficiently manage storm water. The list of projects included in the DWMP incorporate environmental concerns utilizing "Green Infrastructure" as exemplified through the 21st Street Green Street project, completed in 2013. Streets identified in the DWMP for Green Street upgrades include: 1) 15th Street south of Oak Street; 2) 7th Street south of Oak Street; and 3) 8th Street south of Oak Street.

Dam Inundation

Dam failure involves unintended releases or surges of impounded water resulting in downstream flooding. The water released from dam failure results in the potential for human casualties, economic loss, service disruption, and environmental damage. While dam failure may involve the total collapse of a dam, this is not always the case as damaged spillways, overtopping from excessive rainfall, or other complications, including the unintended consequences from normal operations, can result in hazardous situations. Due to the lack of advance warning, failures from natural events, such as earthquakes, or landslides, may be particularly severe.

The Salinas Reservoir Dam is located approximately 21 miles southeast of the town of Santa Margarita in San Luis Obispo County. The dam can currently store up to 23,843-acre feet of water. The failure of the Salinas Dam would flood an area of 1.07 square miles along the Salinas River within the Paso Robles City limits as seen in Figure S-7 of the City of El Paso de Robles General Plan 2003 Safety Element (see Exhibit #3 City of

El Paso de Robles General Plan 2003 Safety Element Salinas Dam Failure Inundation Figure S-7). The depth of flooding due to the failure of this dam is unknown. There have been no recorded dam failures affecting Paso Robles.

Regulatory Agencies

The City of Paso Robles is responsible for flood protection and management within the City boundaries. The Local Hazard Mitigation Plan (LHMP) outlines agencies and technical resources available for emergency services in the event of a natural or manmade disaster. There are no other public agencies responsible for flood protection in Paso Robles.

Under the Flood Control and Coastal Emergency Act, the U.S. Army Corps of Engineers (USACE) provides disaster preparedness and response services and advanced planning measures designed to reduce the amount of damage caused by an impending disaster. USACE responds to natural and man-made disasters through the mobilization of personnel and other resources across the country.

In any disaster, USACE top priorities are:

- Support immediate lifesaving and life safety emergency response; City of El Paso de Robles General Plan 2003 Open Space Element S-9 Revised November 2014 via GPA 2014-003
- Sustain lives with critical commodities, temporary emergency power and other needs
- Initiate recovery efforts by assessing and restoring critical infrastructure

The review of the Project and benefits of the proposal must still consider its location within the floodplain. Therefore, the County will require HASLO and ECHO to notify its clients as to the proximity of the shelter and property to the Salinas River and location within the river's 500-year flood zone and the potential dangers of a flood event.

HASLO shall also prepare an emergency evacuation plan to safeguard its clients and those of ECHO to reach safety, including access to the facilities' second story for immediate relief and safety.

(d) Step 4. Identify and evaluate the potential direct and indirect impacts associated with the occupancy or modification of the 100-year floodplain (or the 500-year floodplain for a Critical Action) or the wetland and the potential direct and indirect support of floodplain and wetland development that could result from the proposed action.

The focus of the floodplain evaluation should be on adverse impacts to lives and property, and on natural and beneficial floodplain values.

Project Homekey Rehabilitate Transitional Housing and Emergency Shelter Facility Project
Eight-Step Decision-Making Process

- Option A – This option involves the removal of accessibility impediments by replacing a non-compliant building design with ADA compliant accessibility requirements and building codes. This will not result in impacts to floodplain values and will result in long-term benefits to the community through increased accessibility and a safer building. This Project will not facilitate additional flood development and it will not obstruct storm water flow in the floodway.
- Option B – This option would involve taking no action. This would pose no benefit to the homeless clients in the North County area.

The proposed Project does not involve the expansion of the existing building nor new construction, via additional square footage, within the 500-year floodplain that could have potential direct and indirect impacts to the floodplain or wetlands of the Salinas River. While it is likely the immediate area to the Project experienced flooding in the past, the buildings on the property advantageously have a second story where residents of the property can escape to if the surrounding area experience flooding. No structures or improvements will be located beyond the existing building footprint or in the floodway. There will be no wetland impacts associated with the Project as this area is located solely within the 100-year flood zone.

The highest priority of this review is to prevent the loss of life. To preserve lives, local law enforcement and the emergency broadcast system will implement an early warning system should flooding conditions arise. In addition to the warning system, law enforcement has an emergency evacuation and relocation plan.

The Project building shall display an emergency evacuation plan. The plan shall consist of the building's flood plan with all rooms identified, evacuation route to all building exits. All residents will also be briefed on the location of the flood hazard area and evacuation plans upon placement. The plan shall also identify the building's second floor as an escape and protection area for flood survivors.

According to FEMA, the City of Paso Robles is a member of the National Flood Insurance Program (<https://www.fema.gov/cis/CA.html>). HUD requires projects located in the floodplain to maintain flood insurance for the life of the property to mitigate any effects of flooding.

In addition to concerns for life and property, the County considered the natural and beneficial values of the floodplain. The natural resources of the floodplain include water, biological, and societal resources. By not constructing outside of the existing building footprint, the rehabilitation will not affect water resources.

The proposed Project will not affect agricultural lands and vegetation. The site will be maintained as presently exists, consisting primarily of a large parking lot and maintained Project Homekey Rehabilitate Transitional Housing and Emergency Shelter Facility Project

landscape area. Finally, excavation is not proposed as part of this Project and therefore not consequential to the flood zone.

(e) Step 5. Where practicable, design or modify the proposed action to minimize the potential adverse impacts to and from the 100-year floodplain (or the 500-year floodplain for a Critical Action) or the wetland and to restore and preserve its natural and beneficial functions and values.

The Project rehabilitation will not create a negative impact within the base floodplain because the building is existing, and the proposal does not include new construction, except for a new staircase, beyond the current footprint. There will be no net increase in concrete and thus no impacts downstream. Thus, no "harm" will come to or within the floodplain because of this Project. "Harm", is defined in the Federal Management Executive Order #11988 as, "Negative impacts to people, property or natural systems such as injury, loss of life, damage to property or natural resources, or impairment of beneficial floodplain functions."

MITIGATIONS

Preserving Lives: In order to preserve lives, local law enforcement and the emergency broadcast system will implement an early warning system should flooding conditions arise. In addition to the warning system, law enforcement has an emergency evacuation and relocation plan.

The Project building shall display an emergency evacuation plan. The plan shall consist of the building's flood plan with all rooms identified, evacuation route to all building exits. All residents will also be briefed on the location of the flood hazard area and evacuation plans upon placement. The plan shall also identify the building's second floor as an escape and protection area for flood survivors.

Preserving Property: HASLO shall provide proof of and maintain flood insurance for the subject property. In order to preserve property, flood insurance shall be acquired and maintained to mitigate possible flood damage. HASLO shall provide proof of flood insurance to the County at the time of contract execution.

(f) Step 6. Reevaluate the proposed action to determine:

(1) The re-evaluation of alternatives shall include the potential impacts avoided or caused inside and outside the floodplain or wetland area. The impacts should include the protection of human life, real property, and the natural and beneficial functions and values served by the floodplain or wetland.

Relocation: Relocating the transitional housing and homeless shelter to a site outside of a flood plain

It is not feasible for HASLO and ECHO to relocate a new facility because relocation will take considerable time to implement a capital campaign to raise funding, locate a site with the zoning which allows both transitional housing and a homeless shelter, rehabilitate the new building to comply with city building codes, possibly remediate the building of asbestos and lead-based paint building materials, to suit the needs as a homeless shelter and sell the current shelter property. This alternative could take 2-3 years to implement and cost considerably more than the proposed rehabilitation.

In addition, relocating the Project outside of the core center of the City of Paso Robles and availability of facilities or building which could accommodate the land uses required by the Project, and it will take clients out of the service area they may depend on under their current living conditions.

(2) A re-evaluation of alternatives under this step should include a discussion of economic costs. For floodplains, the cost estimates should include savings or the costs of flood insurance, where applicable, flood proofing; replacement of services or functions of critical actions that might be lost; and elevation to at least the base flood elevation for sites located in floodplains, as appropriate on the applicable source under Section 55.2(b) (1). For wetlands, the cost estimates should include the cost of filling the wetlands and mitigation.

Alternatives which consist locating the Project outside the floodplain or taking "no action" are not practicable because the Project is of a scale which cannot be accommodated by existing facilities located outside of a flood zone and services provided within the downtown area of the City of Paso Robles. Also, the alternative sites identified did not meet the criteria to provide an impact on the current homeless issues experienced by the City and the North County where a large homeless population live in encampments in the riverbed.

(g) Step 7.

(1) If the reevaluation results in a determination that there is no practicable alternative to locating the proposal in the 100-year floodplain (or the 500-year floodplain for a Critical Action), or the wetland, publish a final notice that includes:

- (i) The reasons why the proposal must be located in the floodplain;**
- (ii) A list of the alternatives considered in accordance with paragraphs (c)(1) and (c)(2) of this section; and**
- (iii) All mitigation measures to be taken to minimize adverse impacts and to restore and preserve natural and beneficial functions and values.**

(2) In addition, the public notice procedures of Sec. 55.20(b) (1) shall be followed, and a minimum of 7 calendar days for public comment before approval of the proposed action shall be provided.

See Attachment B – Notice #2 on page 25 of this document.

To provide the public with sufficient information early in the decision-making process concerning a floodplain, a second public notice concerning this determination was published in the San Luis Obispo's The Tribune newspaper on July 20, 2021. This allowed for a 7-day comment period ending July 27, 2021, at 5:00 PM. Attached is a copy of the affidavit from The Tribune of the published notice that appeared in the San Luis Obispo Tribune and was mailed to the attached list of interested parties and agencies.

The County of San Luis Obispo did not receive public comments on Notice #2.

DETERMINATION

It is the County of San Luis Obispo's determination that there is no practicable alternative to locating a portion of or all the Project outside the Salinas River 500-year floodplain because:

1. It is infeasible and impractical to relocate the homeless shelter and transitional housing facility to a property located outside the flood zone. This would significantly increase the project delays by several months or years. There is no guarantee that should another property be identified outside of a flood zone that other rehabilitation and code deficiencies will present themselves which would drive up the project costs.
2. Selection of an alternative project location outside of the floodplain would not alleviate the need for affordable housing and an emergency shelter nor combat COVID-19 nor to address the basic facility infrastructure upgrade needs at the Project site.
3. A "no action" plan would not resolve or improve the existing needs nor reduce the pandemic situation among the homeless population.
4. The proposed Project will provide a benefit to the homeless in the North County area by providing an isolation room for clients experiencing symptoms of the coronavirus.
5. The Project will not negatively impact existing development and would not facilitate additional development in the floodplain.

MITIGATIONS

Preserving Lives: In order to preserve lives, local law enforcement and the emergency broadcast system will implement an early warning system should flooding conditions arise. In addition to the warning system, law enforcement has an emergency evacuation and relocation plan.

Evacuation Plan: Prior to the completion of the Project, HASLO and ECHO shall submit to the County an Evacuation Plan. The purpose of the Evacuation Plan is to avoid confusion and prevent injuries to personnel, clients, and visitors to the Project site.

The Project building shall display an emergency evacuation plan. The plan shall consist of the building's flood plan with all rooms identified, evacuation route to all building exits. All residents will also be briefed on the location of the flood hazard area and evacuation plans upon placement. The plan shall also identify the building's second floor as an escape and protection area for flood survivors.

The plan shall include but is not limited to the following criteria:

- Conditions that will activate the plan
- A Chain of command
- Emergency functions and who will perform them
- Specific evacuation procedures, including routes and exits
- Posting of evacuation routes and exits
- Procedures for accounting for personnel, clients, and visitors
- Equipment for personnel
- Review the plan with workers.
- Identify an area of higher ground at the property, including a building's second story or nearby location outside the flood zone
- Accommodate clients and visitors to the designed areas of high ground followed up with procedures for accounting for personnel, clients, and visitors.

FEMA provides planning guidance for consideration in case of a natural hazard at: <https://www.fema.gov/emergency-managers/national-preparedness/plan#coq>

(h) Step 8. Upon completion of the decision-making process in Steps 1 through 7, implement the proposed action. There is a continuing responsibility to ensure that the mitigating measures identified in Step 7 are implemented.

Subject to the findings of the Environmental Review process under the National Environmental Policy Act and with regards to any comments or recommendations received, the proposed Project in an "AO" floodplain will be carried out.

The mitigations described in this document will be included in the Community Development Block Grant program subrecipient agreement as a contractual obligation by HASLO and said language is to be included in the project design plans.

List of Sources, Agencies and Persons Consulted [40 CFR 1508.9(b)]:

- Federal Emergency Management Agency, Flood Map Service Center, FIRM #06079C0389G (effective on 11/16/2012), <https://msc.fema.gov/portal/home> [FEMA Flood Map Service Center | Welcome!](#)
- Federal Emergency Management Agency, Flood Map Service Center, FIRM #06079C0389G (effective on 11/16/2012), <https://msc.fema.gov/portal/home> [FEMA Flood Map Service Center | Welcome!](#)
- U.S. Department of the Interior, U.S. Geological Survey, Paso Robles Quadrangle, 7.5-Minute Series, Paso Robles, CA (2018), USGS 1:24K Topographic Map ([Paso Robles, CA Topographic Map - TopoQuest](#))
- Source: <https://www.pickatrail.com/topo-map/p/7.5x7.5/paso-robles-ca.html>
- Louisiana State University Agricultural Center, Louisiana Cooperative Extension Services, "Floodwall," by Pat Skinner, Disaster Programs Coordinator, Publication 2745, July 1999. (<https://www.lsuagcenter.com/NR/rdonlyres/7A01F7C8-703B-47D1-BCCD-63CD0A57721F/2995/pub2745Floodwalls6.pdf>) ([sheetsFlo \(lsuagcenter.com\)](#))
- City of El Paso de Robles General Plan 2003, Safety Element, Adopted December 16, 2003
Source: <https://www.prcity.com/DocumentCenter/View/14339/Safety-Element-PDF> ([General Plan - Safety Element \(prcity.com\)](#))
- Federal emergency Management Agency, Community Status Book Report, California, Communities Participating in the National Flood Program, 7/13/2021, page 4 of 13, (<https://www.fema.gov/cis/CA.html>)

Exhibits

- **Exhibit #1:** Federal Emergency Management Agency's Flood Insurance Rate Map #06079C039G and #0607C0389G (effective date of November 16, 2012).
- **Exhibit #2:** FEMA Flood Insurance Rate Maps for the Western Portion of the City of Paso Robles
- **Exhibit #3:** City of El Paso de Robles General Plan 2003 Safety Element Salinas Dam Failure Inundation Figure S-7

Attachments:

Attachment A – Affidavits of Publication

Notice #1 – July 4, 2021 (Affidavit from The Tribune)

Attachment B – Affidavits of Publication

Notice #2 – July 20, 2021 (Affidavit from The Tribune)

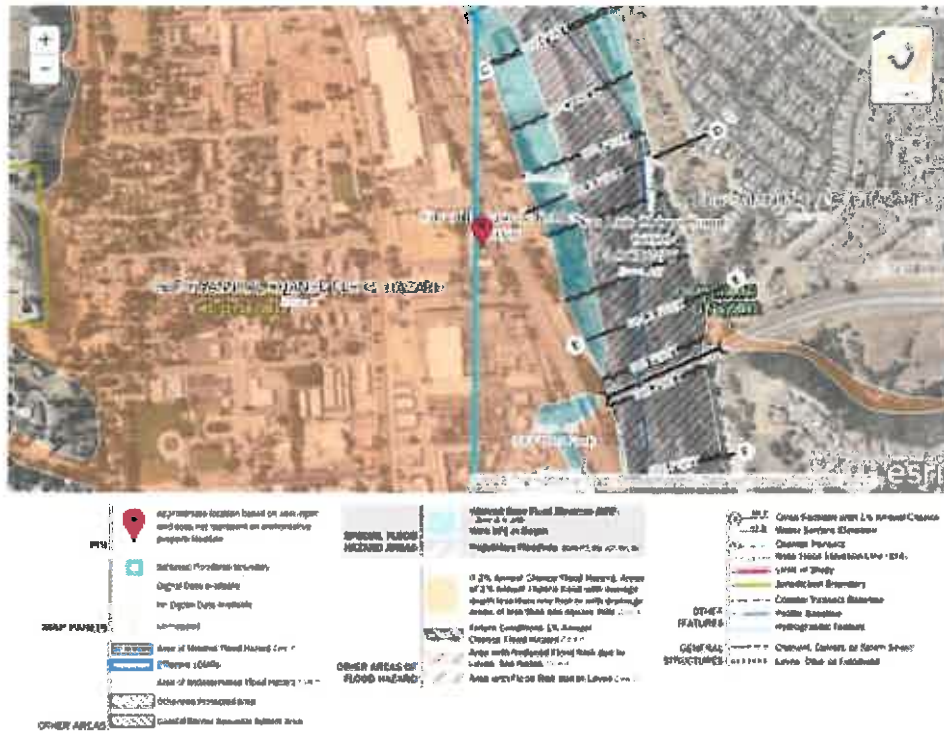


Exhibit #1: Federal Emergency Management Agency's Flood Insurance Rate Map #06079C039G and #0607C0389G (effective date of November 16, 2012).
Source: [FEMA Flood Map Service Center | Search By Address](#)
Obtained March 18, 2021

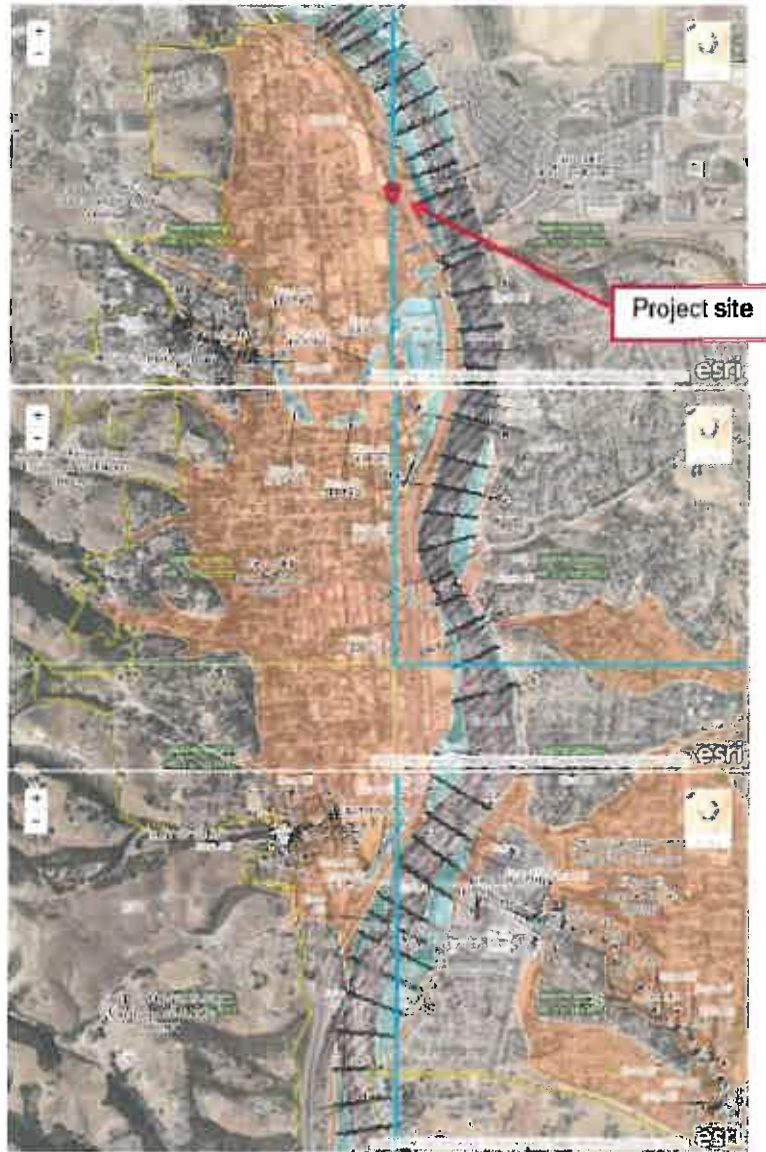
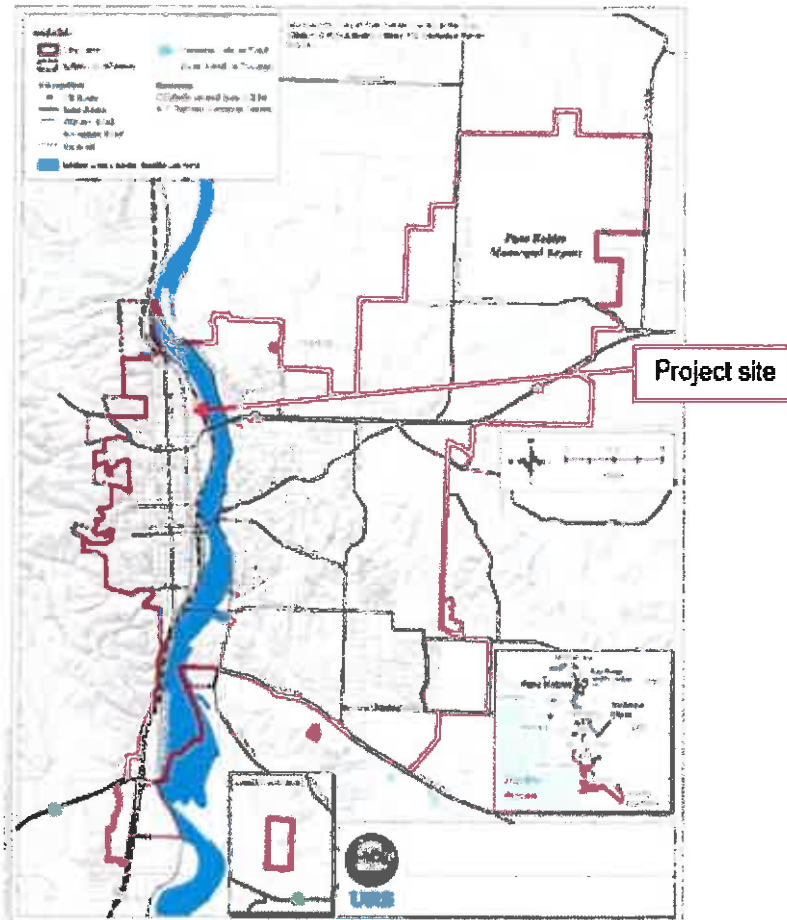


Exhibit #2: FEMA Flood Insurance Rate Maps for the Western Portion of the City of Paso Robles.
Source: [FEMA Flood Map Service Center | Search By Address](#)
Obtained July 13, 2021



Salinas Dam Failure Inundation Figure S-7
City of El Paso de Robles

Exhibit #3: City of El Paso de Robles General Plan 2003 Safety Element Salinas Dam Failure Inundation Figure S-7
Source: City of El Paso de Robles General Plan 2003 Safety Element
Obtained July 13, 2021

Attachment A – Affidavits of Publication
Notice #1 – July 4, 2021, affidavit of publication from The Tribune



AFFIDAVIT OF PUBLICATION

Table with columns: Account #, Order Number, Identification, Order PO, Amount, Cols, Depth. Row 1: 2010, 92047, Print Legal Ad - PFL0000852, 5178 04, 2, 766

Attention: Tony Navarro
SLO CO DEPT OF PLANNING & BLDG
976 CSOS ST RM 300 DEPT OF PLNG BLDG
SAN LUIS OBISPO, CA 93401

In The Superior Court of The State of California
In and for the County of San Luis Obispo

No. of insertions: 1
Beginning Issue of: 07/04/2021
Ending Issue of: 07/04/2021

Jane E. Durand (Signature)

Legal Clerk

STATE OF TEXAS

County of Dallas

I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen and not interested in the above entitled matter. I am now, and at all times embraced in the publication herein mentioned was, the principal clerk of the printers and publishers of The Tribune, a newspaper of general circulation printed and published daily at the City of San Luis Obispo in the above named county and state; that notice as to which the annexed clippings is a true copy, was published in the above named newspaper and not in any supplement thereof - on the following dates to wit: From 07/04/2021 To 07/04/2021 that said newspaper was daily and regularly ascertained and established a newspaper of general circulation by Decree entered in the Superior Court of San Luis Obispo County, State of California, on June 9, 1952, Case #19791 under the Government Code of the State of California.

I certify for record under the penalty of perjury that the foregoing is true and correct.

Shonda Perisich (Signature)

Notary Public in and for the State of Texas, residing in Dallas County



Extra charge for lost or duplicate affidavits.
Legal documents please do not destroy!

Notary Public for the State of Texas
I, Jane E. Durand, do hereby certify that the above and foregoing is a true and correct copy of the original as shown to me by the affiant. My commission expires on 07/04/2021.

- Notary Public for the State of Texas
I, Jane E. Durand, do hereby certify that the above and foregoing is a true and correct copy of the original as shown to me by the affiant. My commission expires on 07/04/2021.

Attachment B – Affidavits of Publication
Notice #2 – July 20, 2021, affidavit of publication from The Tribune



AFFIDAVIT OF PUBLICATION

Account #	Order Number	Identification	Order PO	Amount	Cols	Depth
2040	100007	HASLO 8 Signatures		\$850.00	6	20.50 in

Attention: **Tony Navarro**
 SLO CO DEPT OF PLANNING & BLDG
 976 OSOS ST RM 300 DEPT OF PLNG-BLDG
 SAN LUIS OBISPO, CA 93401

Copy of ad content
 is on the next page

In The Superior Court of The State of California
 In and For the County of San Luis Obispo

No. of insertions: 1
 Beginning issue of: 07/20/2021
 Ending issue of: 07/20/2021

Jane E. Derrand

Legal Case

STATE OF TEXAS

SS

County of Dallas

I am a citizen of the United States and a resident of the County aforesaid. I am over the age of eighteen and not interested in the above entitled matter. I am now, and at all times embraced in the publication herein mentioned was, the principal clerk of the printers and publishers of The Tribune, a newspaper of general circulation, printed and published daily at the City of San Luis Obispo in the above named county and state that notice at which these annexed clippings is a true copy, was published in the above named newspaper and not in any supplement thereof - on the following dates to wit, from 07/20/2021 to 07/20/2021 that said newspaper was duly and regularly as aforesaid and established a newspaper of general circulation by decree entered in the Superior Court of San Luis Obispo County, State of California, on June 9, 1953, Case #1953 under the Government Code of the State of California

I testify for declare under the penalty of perjury that the foregoing is true and correct

Shanda Perischna

Notary Public in and for the State of Texas, residing in Dallas County



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 Legal documents please do not destroy!

