

**ADDENDUM TO AN
ENVIRONMENTAL IMPACT REPORT
Project No. 104495/SCH No. 2006091032**

SUBJECT: GENERAL PLAN HOUSING ELEMENT UPDATE 2021-2029: The Housing Element Update for 2021-2029 is intended to identify and analyze the City of San Diego's (City's) housing needs, establish reasonable goals, objectives and policies based on those needs, and provide a comprehensive set of programs and actions to achieve the identified goals and objectives. As required by State law, it includes standards and plans for the improvement of housing, the identification of adequate developable sites for housing, and a program of actions that the City is undertaking or will undertake within the specified eight-year cycle to implement policies and achieve goals and objectives for the adequate provision of the housing needs of all segments of the City.

I. PROJECT DESCRIPTION:

The Housing Element Update contains objectives, policies, and programs for each of the following goals:

1. Facilitate the construction of quality housing
2. Improve the existing housing stock
3. Provide new affordable housing
4. Enhance quality of life
5. Exemplify sustainable development and growth
6. Publicize housing needs and resources

Goal 1: Facilitate the construction of quality housing

Objective A: Identify adequate sites available for development.

The City encourages the production of a diversity of new housing to ensure that an adequate supply is available to meet the existing and future needs of all residents. The Housing Element includes an inventory of land distributed throughout the City that could be redeveloped during this eight-year cycle (2021-2029) to meet the City's Regional Housing Needs Assessment (RHNA) targets.

Objective B: Implement permitting process improvements.

The time and cost to obtain permits for housing construction and development projects is often a top constraint cited by developers and housing advocates. The City can take steps, including continuing its annual updates to the San Diego Municipal Code (Municipal Code), to make permitting for housing projects easier and faster across all levels of affordability while ensuring the health and safety of the public.

Objective C: Provide programs that incentivize development.

One of the City's most effective tools for increasing production is developing programs that offer developers easier or more cost-effective permit processing and development incentives in exchange

for locating housing and providing infrastructure where it is most needed and desired.

Objective D: Improve infrastructure systems to support infill development and promote affordable housing.

One challenge to increasing housing density in existing developed communities is the widespread public opinion that existing infrastructure is deficient or does not meet the community's needs. Community members conclude that additional housing will put further demand on infrastructure and should not be permitted until infrastructure is improved. Addressing infrastructure systems is thus important to facilitate development of infill and affordable housing.

Objective E: Support programs aimed at housing vulnerable and special needs populations.

As discussed in Appendix HE-B, Demographics, San Diego is changing. The demographics of San Diego are changing. The population is growing; seniors will become a larger proportion of the population; and the City will experience a surge in jobs. As the economy grows and changes, more people, especially lower-income households that are a vital and valuable part of our community, will need additional attention and support to ensure they can thrive in San Diego. The City can identify and implement programs to assist in meeting the housing needs of vulnerable and special needs citizens.

Objective F: Set and evaluate annual housing production targets.

In accordance with State requirements, the City prepares Housing Element Annual Progress Reports each calendar year to assess the City's progress toward its eight-year RHNA housing production targets and toward the implementation of housing activities identified in the Housing Element. In the past, the City has not broken down its eight-year production target into annual targets, and responsibility for undertaking housing activities has been split across multiple departments and organizations. Incremental goals and dedication of personnel to housing policies and programs have the potential to increase and sustain momentum toward achieving the City's goals.

Goal 2: Improve the existing housing stock

Objective G: Repair and maintain the existing housing stock.

The City intends to support the repair and maintenance of existing homes within the City to ensure that households living in existing homes can live in safe and sanitary conditions and to reduce the potential for loss of existing units from the City's housing stock.

Objective H: Preserve existing low-income housing.

Each year, rent restriction agreements expire, which means the affordable housing units that they cover can be converted to market-rate rents. The City and San Diego Housing Commission (SDHC) work together to mitigate potential loss of "at-risk" units due to conversion to market rate units. The City will also explore ways to identify new ways to preserve naturally affordable housing.

Goal 3: Provide new affordable housing

Objective I: Promote a diversity of housing available to all income groups across all communities.

The City, in accordance with the General Plan's guiding principles, works to achieve a diversity of housing available to households of all income levels citywide through inclusionary housing

requirements, preservation and/or rehabilitation of “at-risk” affordable housing, and other programs and actions. When households of all incomes throughout the City can live near transit, employment opportunities, schools, and resources to meet the needs of daily living, the City can achieve balanced communities and address broader goals such as the City of Villages strategy and climate action goals.

Objective J: Administer affordable rental and homeownership assistance programs.

One cost-effective way to preserve and create affordable housing is to provide rental and homeownership assistance, such as financial support and homeownership education and programs.

Objective K: Support and engage in innovative methods for financing housing development.

In addition to ensuring that housing is provided for all households across all communities and to providing lower income households with rental and homeownership payment assistance, the City can also identify and promote new methods of financing housing development and new forms of homeownership.

Goal 4: Enhance quality of life

Objective L: Protect public health and safety.

Protecting public health and safety is a primary priority for the City. Every household deserves to live in housing free from damage, deterioration, and pollution.

Objective M: Create vibrant, equitable communities.

The City’s General Plan and community plans set the vision, land use, and policies to guide future development. Many of the concerns that the City hears when it engages with the public on long-range planning, housing, and development projects are related to neighborhood characteristics, future development, and change. To address these concerns while fostering new development, the City can take steps to enhance its communities and to preserve cultural and historical resources.

Objective N: Prevent displacement.

In markets where housing supply is low and costs are high, the potential for displacement of long-term residents—primarily low-income households—increases as rents and property values rise and barriers to housing in communities with better jobs, schools, parks, shopping, and transportation options grow. Increasing the affordable housing supply citywide is one way the City can reduce the likelihood of displacement. The City can also reduce the impact of displacement when it occurs by preventing practices that increase or enable displacement.

Goal 5: Exemplify sustainable development and growth

Objective O: Align housing policies with State and local GHG emissions reduction and climate adaptation strategies.

The State and City have set ambitious goals for reducing greenhouse gas (GHG) emissions in energy use, buildings, water consumption, and transportation. These targets relate to housing through land use, infrastructure, mobility planning, and resident behaviors. The City’s housing policies should

align with its climate goals and strategies.

Objective P: Promote innovative green / sustainable building practices.

New development in the City should target to produce as much energy as it consumes (net-zero energy), in accordance with the City's General Plan conservation policies. There are a variety of Federal, State, and local policies and programs applicable to the design and construction of sustainable housing. The City has developed, adopted, and implemented programs to increase energy efficiency and promote conservation while mitigating the effects of climate change.

Objective Q: Support policies and programs that reduce resource consumption in existing homes.

While new development can be designed to be increasingly resource (energy and water) efficient, existing development cannot reasonably achieve net-zero energy consumption without significant investment and commitment by property owners citywide. For this reason, the City works to educate and incentivize owners of existing development to conserve water and energy and shift, when possible, to renewable energy sources to meet residential energy needs.

Goal 6: Publicize housing needs and resources

Objective R: Foster discussion on housing needs, resources, and ideas citywide.

The City primarily engages with the public on housing topics through the community plan update process and via the community planning groups when projects are proposed within communities. This approach is important and can be effective at the community level, but housing supply and affordability is a citywide challenge and requires a broader dialogue that reaches all residents.

Objective S: Make information more easily accessible.

The City and SDHC support and administer many programs that address housing access and affordability for lower income households. Many people who need these resources have trouble finding them, and those who are concerned about lower income housing being built in their low-density neighborhoods or skeptical of the City's need are not aware of how long lower income households must wait to receive the necessary support to maintain their housing. The City should make information about San Diego's housing needs easier to find and understand, and should make the City's and its partners' housing resources easy to find and use.

II. ENVIRONMENTAL SETTING:

See Final Program Environmental Impact Report (PEIR) No. 104495/SCH No.2006091032 for the City of San Diego General Plan.

III. PROJECT BACKGROUND:

The Housing Element serves as a policy guide to address the comprehensive housing needs of the City. It is one of ten elements of the City of San Diego's General Plan and is mandated by the State of California Government Code. State law requires that local jurisdictions outline the housing needs of their community, the barriers or constraints to providing that housing, and actions proposed to address these concerns over an eight-year period. The Housing Element is subject to detailed statutory requirements and mandatory review by the California Department of Housing and Community Development (HCD). In accordance with California Senate Bill 375 (2008), the Housing

Element Update would improve transportation and land use coordination to achieve the regional greenhouse gas targets through feasible development patterns, infrastructure investments, and/or transportation measures or policies, consistent with a regional "Sustainable Communities Strategy."

IV. DETERMINATION:

The City of San Diego previously prepared and certified the draft General Plan PEIR (Project No. 104495/SCH No.2006091032). Based upon a review of the current project, it has been determined that:

- a. There are no new significant environmental impacts not considered in the previous PEIR;
- b. No substantial changes have occurred with respect to the circumstances under which the project is undertaken; and
- c. There is no new information of substantial importance to the project.

Therefore, this Addendum has been prepared in accordance with Section 15164 of the State CEQA Guidelines. Public review of this Addendum is not required per CEQA.

As shown below, the Housing Element update for 2021–2029 is consistent with all other elements of the General Plan and there would be no new significant environmental impacts which were not already considered in the previous PEIR.

V. DISCUSSION

The Final PEIR for the General Plan found that, although significant impacts could be mitigated through a review of discretionary projects, implementation of the General Plan would result in significant and unavoidable impacts to Agricultural Resources, Air Quality, Biological Resources, Geologic Conditions, Health and Safety, Historic Resources, Hydrology, Land Use, Mineral Resources, Noise, Paleontological Resources, Population and Housing, Public Facilities, Public Utilities, Transportation/Traffic/Circulation/Parking, Visual Effects and Neighborhood Character, and Water Quality as site-specific details of future development projects are unknown at this time. Similarly, it is anticipated that implementation of the Housing Element Update will also result in significant and unavoidable impacts in the same issue areas given the lack of site-specific details of future development projects that could occur under the Housing Element Update. Thus, the City reviewed the Housing Element Update against the other nine elements of the General Plan to determine the Housing Element Update's consistency with what was previously analyzed.

Land Use and Community Planning

The Land Use and Community Planning Element provides policies to implement the City of Villages strategy within the context of San Diego's community planning program. The Land Use and Community Planning Element establishes a structure that respects the diversity of each community and includes policy direction to govern the preparation of community plans. The element addresses zoning and policy consistency, the plan amendment process, annexation policies, airport-land use planning, balanced communities, equitable development, and environmental justice.

The Housing Element Update complements the Land Use and Community Planning Element by advancing goals, objectives, and policies that are consistent with the City of Villages strategy which strives to: increase housing supply and diversity through the development of compact, mixed use villages near transit services; encourage better links from homes to jobs and services; create and maintain economically and socially diverse communities; and treat all people fairly with respect to development and implementation of environmental laws, policies, regulations, and practices. Policy HE-A.2 calls for community plans to be updated regularly to identify areas appropriate for increased infill, residential and mixed-use development and to encourage location- and resource-efficient

development whereby housing is located near employment, shopping, schools, recreation, transit, and walking/bicycling infrastructure. Objective I aims to promote a diversity of housing available to all income groups across all communities. Goal 4, Enhance Quality of Life, includes objectives and policies to create vibrant, equitable communities and prevent displacement.

Further, the Housing Element Update relies on the City's community plans to guide the location and provision of housing and supporting infrastructure and public facilities, consistent with the policies in the Community Planning section (Section C) of the Land Use and Community Planning Element. The adequate sites inventory in the Housing Element Update relies on the City's land use plans to identify suitable locations for housing throughout the City. Therefore, the Housing Element Update is consistent with the Land Use and Community Planning Element of the General Plan and there are no new significant environmental impacts not considered in the previous PEIR.

Mobility Element

The Mobility Element contains policies that promote a balanced, multi-modal transportation network that gets us where we want to go and minimizes environmental and neighborhood impacts. In addition to addressing walking, bicycling, transit, and streets, the Mobility Element also includes policies related to regional collaboration, parking, the movement of goods, and other components of our transportation system.

The Housing Element Update complements and advances the goals of the Mobility Element by working to improve transportation and land use coordination to create more compact, walkable, and transit-oriented communities. Policies such as HE-O.3 call for the provision of incentives for residential and mixed-use development at major transit nodes, along transit corridors, and in other appropriate locations for high-intensity housing development. The Housing Element Update also emphasizes the importance of locating affordable housing near transit through policies such as HE-I.12. Proposed activities in the Housing Element Update also identify actions the City can take to promote a balanced, multi-modal transportation network, such as engineering and implementing roads that give priority to transit, bicycles, and pedestrians, and devoting resources to helping neighborhoods that accept affordable housing to pilot, and later implement, new planning concepts that promote walkability, bicycling, and transit actions. Thus, the Housing Element Update is consistent with the Mobility Element of the General Plan and there are no new significant environmental impacts not considered in the previous PEIR.

Urban Design Element

Urban Design policies capitalize on San Diego's natural beauty and unique neighborhoods by calling for development that respects the natural setting, enhances the distinctiveness of our neighborhoods, strengthens the natural and built linkages, and creates mixed-use, walkable villages throughout the City.

The Housing Element Update includes policies which complement the goals of the Urban Design Element to promote development that is consistent with the social, economic, and aesthetic values of the City. Objective M, policies HE-M.1 through HE-M.6 encourage development that enhances communities with placemaking and public spaces, fosters a sense of community through design features that promote interaction and active lifestyles, and development that preserves cultural and historical resources. Similarly, policies such as HE-B.1 call on the City to propose zoning and code changes to reduce average permit processing times while improving the quality of design and development. The Housing Element Update also identifies proposed activities the City can do to encourage high-quality design, such as working with partners in the development, architecture, and academic fields to develop best practices across building types and styles to promote cohesion in neighborhoods; and promoting and identifying local examples of exemplary eco-friendly designs. Through implementation of these policies and proposed activities, the Housing Element Update would facilitate urban design in accordance with the Urban Design Element. Thus, the Housing

Element Update is consistent with the Urban Design Element of the General Plan and there are no new significant environmental impacts not considered in the previous PEIR.

Economic Prosperity Element

The structure of San Diego's economy influences the City's physical development and capacity to fund essential services, and vice versa. The purpose of the Economic Prosperity Element is to increase wealth and the standard of living of all San Diegans with policies that support a diverse, innovative, competitive, entrepreneurial, and sustainable local economy.

The Housing Element Update contains policies which support San Diego's economy by promoting the development of housing near employment areas and the development of affordable housing citywide. Policies such as HE-C.3 and HE-C.4 call on the City to develop a comprehensive strategy to address the need for more housing near employment centers, and encourage employers to provide housing assistance programs for employees who might not otherwise be able to afford to rent or buy homes in the City of San Diego. Similarly, Housing Element Update objectives such as Objective I encourage the development of housing to support workers across all income levels.

The Housing Element Update also includes a number of policies and proposed activities which aim to spur the development of affordable housing, preserve existing naturally affordable housing, and remove barriers to accessing affordable housing. These policies and proposed activities advance the goals of the Economic Prosperity Element as they help increase the number of housing opportunities available to the City's workforce and help the City compete nationally for the best workforce. Thus, the Housing Element Update is consistent with the Economic Prosperity Element and there are no new significant environmental impacts not considered in the previous PEIR.

Public Facilities, Services, and Safety Element

Providing adequate public facilities and services needed to serve the City's current and future population continues to be a great challenge. The Public Facilities, Services, and Safety Element responds to this challenge through policies that address public financing strategies, public and developer financing responsibilities, prioritization, and the provision of specific facilities and services that must accompany growth.

The Housing Element Update contains a number of policies and proposed activities which address the provision of infrastructure and services to accommodate the projected growth in the City. Objective D, policies HE-D.1 through D.4 call on the City to monitor existing infrastructure and public facility deficits and future needs, identify and explore existing and new funding sources and financing tools to provide needed infrastructure, and improve coordination with other agencies regarding the planning and construction of future infrastructure projects to help facilitate development of infill and affordable housing. The Housing Element Update also includes policies which encourage the expansion of services in tandem with development in the City. For example, Housing Element Policy HE-E.2 calls on the City to support affordable housing developers and homeless providers who, together, can provide an array of housing linked with services; and Housing Element Policy HE-D.10 promotes supporting and encouraging demonstration projects that connect healthcare services to housing (especially for vulnerable populations). Additionally, the Housing Element Update identifies a variety of proposed activities to improve infrastructure and services throughout the City. Proposed activities include coordinating with non-profit partners to provide services to vulnerable populations, and creating incentive programs that generate infrastructure development or investment. Implementation of these proposed policies and activities would assist the City in providing adequate public facilities and services that meet the needs of its residents. Thus, the Housing Element Update is consistent with the Public Facilities, Services, and Safety Element of the General Plan and there are no new significant environmental impacts not considered in the previous PEIR.

Recreation Element

The City of San Diego has over 38,930 acres of park and open space lands that offer a diverse range of recreational opportunities. The City's parks, open space, trails, and recreation facilities play an important role in the physical, mental, social, and environmental health of the City and its residents. Parks and open space lands also benefit the environment by providing habitat for plants and animals, and space for urban runoff to percolate into the soil, while also serving to decrease the effects of urban heat islands.

The Housing Element Update is consistent with the goals of the Recreation Element as it would encourage the development of housing near recreational amenities. Policy HE-A.2 calls on the City to, through the Community Plan Update process, encourage location- and resource-efficient development whereby housing is located near employment, shopping, schools, recreation, transit, and walking/bicycle infrastructure. The Housing Element Update also calls on the City to work with its nonprofit partners to identify and promote best practices of healthy living such as through the development of recreational amenities, and through the planning of more, smaller parks accessible by transit, walking, and bicycling across communities. Implementation of these proposed activities would contribute to the Recreation Element's goal of developing and enhancing public recreation opportunities and facilities throughout the City. Thus, the Housing Element Update is consistent with the Recreation Element of the General Plan and there are no new significant environmental impacts not considered in the previous PEIR.

Conservation Element

The Conservation Element contains policies to guide the conservation of resources that are fundamental components of San Diego's environment, that help define the City's identity, and that are relied upon for continued economic prosperity. Over long term, conservation is the most cost-effective strategy to ensure that there will be a reliable supply of the resources that are needed now and in the future.

The Housing Element Update includes policies and proposed activities which promote sustainable development and growth in the City with a focus on conserving resources and energy while mitigating the effects of climate change. Housing Element Policies HE-P.1 and HE-P.2 encourage the use green building practices that promote energy conservation and that incorporate passive and active green space that can provide carbon capture and cooling in urban environments. Similarly, the Housing Element Update contains policies such as HE-O.2 which encourages the development of new housing that relies on and supports transit use and environmentally sustainable patterns of movement, and HE-O.5 which promotes the development of policies and programs that help achieve the California Climate Strategy and the City's Climate Action Plan goals. Thus, the Housing Element Update would be consistent with the goals of the Conservation Element as it would also work to encourage development that is sustainable and conserves San Diego's natural resources, and there are no new significant environmental impacts not considered in the previous PEIR.

Historic Preservation Element

The Historic Preservation Element seeks to guide in the preservation, protection, restoration, and rehabilitation of historical and cultural resources and maintain a sense of the City of San Diego's rich and varied historical and cultural resources including buildings, structures, objects, landscapes, districts, archaeological sites, and traditional cultural properties that possess historical, scientific, architectural, aesthetic, cultural, or ethnic significance.

The Housing Element Update would work together with the Historic Preservation Element to preserve and protect the City's historical and cultural resources. Housing Element Policy HE-M.1 calls on future development to implement General Plan and community plan goals and policies that relate to architectural design, public spaces, and historical and tribal cultural resources. Similarly, Housing Element Policy HE-M.4 encourages future development to engage actively with local tribal representatives to identify opportunities to preserve and feature tribal, cultural, historical, and

archaeological resources. Proposed activities in the Housing Element Update include encouraging culture mapping in historically underserved communities, which will help preserve neighborhood identity and diversity, and will serve to visually demonstrate how local stories and unique landmarks create meaningful places. Thus, the Housing Element Update would be consistent with the Historic Preservation Element of the General Plan and there are no new significant environmental impacts not considered in the previous PEIR.

Noise Element

Noise at excessive levels can affect our environment and our quality of life. At excessive levels, people typically perceive noise as being intrusive, annoying, and undesirable. The most prevalent noise sources in San Diego are from motor vehicle traffic on interstate freeways, state highways, and local major roads generally due to higher traffic volumes and speeds. Aircraft noise is also present in many areas of the City. Rail traffic and industrial and commercial activities contribute to the noise environment. The Housing Element Update's goal to enhance quality of life would support the Noise Element by deferring to Noise Element and Community Plan policies that ensure that housing is located, sited, and designed in a manner that avoids noise impacts to noise sensitive land uses (e.g., residences hospitals, schools, and libraries) and sensitive receptors. The Housing Element Update's goal to enhance quality of life and related objective to protect public health and safety will support future development that follows applicable regulations and policies regarding traffic noise, aircraft noise, and sensitive receptors. Further, the Housing Element Update's goals, objectives and policies that support the City of Villages strategy (as discussed in the Land Use and Community Planning Element section above) will support new development in a manner that would not create additional traffic noise or increase existing noise levels which exceed the compatible noise level thresholds, as indicated in the Noise Element. Therefore, the Housing Element Update is consistent with the Noise Element of the General Plan and there are no new significant environmental impacts not considered in the previous EIR.

IV. MITIGATION, MONITORING AND REPORTING PROGRAM INCORPORATED INTO THE PROJECT:

The Final PEIR No. 104495 for the City of San Diego Draft General Plan (Project No. 104495 / SCH No. 2006091032), dated March 10, 2008, concluded that the General Plan would result in significant and unmitigated impacts to Agricultural Resources, Air Quality, Biological Resources, Geologic Conditions, Health and Safety, Historic Resources, Hydrology, Land Use, Mineral Resources, Noise, Paleontological Resources, Population and Housing, Public Facilities, Public Utilities, Transportation/Traffic/Circulation/Parking, Visual Effects and Neighborhood Character, and Water Quality. Since the Draft General Plan does not include specific development projects, it is infeasible at the Program EIR level to provide project-specific mitigation that would reduce any future impacts to a less than significant level. Therefore, at this program level of review there is no project-specific Mitigation, Monitoring and Reporting Program proposed and significant and unavoidable impacts associated with the project remain.

VI. SIGNIFICANT UNMITIGATED IMPACTS:

There are no new significant impacts identified in conjunction with implementation of the General Plan Housing Element Update, and significant effects previously examined will not be substantially more severe than shown in the previous Final PEIR. The Final PEIR for the original project identified significant unmitigated impacts for the following issue areas: Agricultural Resources, Air Quality, Biological Resources, Geologic Conditions, Health and Safety, Historic Resources, Hydrology, Land Use, Mineral Resources, Noise, Paleontological Resources, Population and Housing, Public Facilities, Public Utilities, Transportation/Traffic/Circulation/Parking, Visual Effects and Neighborhood Character, and Water Quality. Because there were significant unmitigated impacts associated with

the original project, approval of the project required the decision maker to make specific and substantiated CEQA findings which stated that: a) specific economic, social or other considerations make infeasible the mitigation measure or project alternatives identified in the final PEIR, and b) these impacts have been found acceptable because of specific overriding conditions. No new CEQA findings are required for this project.



Rebecca Malone, AICP
Senior Planner
Planning Department

January 14, 2020
Date of Final Report

Analyst: **Malone**

The Addendum to Environmental Impact Report No. 104495/SCH No. 2006091032 was posted on the City of San Diego's California Environmental Quality Act webpage on January 14, 2020 at <https://www.sandiego.gov/ceqa/final>.

Copies of the addendum, the Final PEIR, the Mitigation, Monitoring and Reporting Program, and any technical appendices may be reviewed in the office of the Planning Department, or purchased for the cost of reproduction.