

Report for Community Forest Advisory Committee on CEQA compliance.

The Urban Forest Management Action Plan (Action Plan) is an element of the City of San Diego's Climate Action Plan (CAP). Specifically it is part of the CAP's Strategy 5, Climate Resiliency the goal of which is to increase the urban tree canopy coverage. As included in the CAP the proposed actions to implement this strategy include the following:

Action 5.1: Present to City Council for consideration a city-wide Urban Tree Planting Program. The target for Action 5.1 is to achieve 15 percent urban tree canopy coverage by 2020 and 35 percent urban tree coverage by 2035.

The CAP includes several supporting measures for Strategy 5:

- Develop a regional (Western San Diego County) Urban Tree Canopy Assessment in collaboration with other regional jurisdictions and SANDAG.
- Prepare a Parks Master Plan that prioritizes parks in underserved communities.
- Hire an Urban Forest Program Manager. (*The Program Manager has been hired*)
- Plan for the long-term maintenance of additional trees and ensure sufficient staff and funding are available.
- Complete the Urban Forest Management Plan and present to City Council for adoption. (*the Action Plan is part of this measure*)

As part of the approval process of the CAP a Program Environmental Impact Report (Program EIR) was prepared and certified. According to Section 15168 (a) of the California Environmental Quality Act (CEQA) Guidelines, ... a Program EIR is an EIR which may be prepared on a series of actions that can be characterized as one large project and are related either:

- (1) Geographically,
- (2) A logical parts in the chain of contemplated actions,
- (3) In connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program, or
- (4) As individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways.

The Action Plan would be considered part of the CAP Program under subsections 2 and 3 of Section 15168 (a).

As to the need of further CEQA analysis of the Action Plan is addressed in Section 15168 (c) *Use of a Program EIR with Later Activities*. Subsequent activities in the program must be examined in the light of the program EIR to determine whether an additional environmental document must be prepared.

- (1) If a later activity would have effects that were not examined in the program EIR, a new Initial Study would need to be prepared leading to either an EIR or a Negative Declaration.
- (2) If the agency finds that pursuant to Section 15162 (section relates to the determining the need and use of subsequent documents), no new effects could occur or no new mitigation measures would be required, the agency can approve the activity as being within the scope of the project covered by the program EIR, and no new environmental document would be required.

For the Action Plan, the document identifies the information that is needed to develop an implementation plan. As such there would be no new effects nor would there be any need for new mitigation measures

required meaning that the Action Plan meets the criteria under Section 15162. Therefore the City Council can approve the Urban Forest Management Action Plan as being within the scope of the Project (the CAP) covered by the CAP PEIR, and no new environmental document would be required.

It should be noted, however, that once the information has been collected and an implementation plan is developed leading to the planting of trees and their maintenance that that plan would be subject to additional CEQA review and would likely require a new Initial Study would need to be prepared leading to either an EIR or a Negative Declaration.