

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

**SUBJECT: GENERAL PLAN PUBLIC FACILITIES, SERVICES, AND SAFETY ELEMENT UPDATE:**

The proposed update would incorporate *Climate Resilient SD*, the City's comprehensive climate adaptation and resiliency plan, into the General Plan Public Facilities, Services, and Safety Element (Safety Element). *Climate Resilient SD* is the City of San Diego's plan to prepare for and adapt to the impacts of climate change, like extreme heat, wildfires, flooding, drought, and sea level rise. It is also a plan for how the City can invest in its communities to make them safer, healthier, and more enjoyable while preparing for climate change. As required by state law, *Climate Resilient SD* includes a climate change vulnerability assessment, a set of adaptation and resilience goals and policies, climate adaptation and resilience strategies, and a set of feasible implementation measures. In addition to fulfilling regulatory requirements, the proposed update will also achieve the goals set forth in the City's 2015 Climate Action Plan, which specifically identifies the need for a standalone climate adaptation plan. *Climate Resilient SD* is a framework for action that includes a range of potential adaptation strategies to minimize risk and increase the resilience of San Diego's people, assets, economy, and natural resources to climate change.

Applicant: City of San Diego Planning Department - Environment & Public Spaces Division

**I. PROJECT DESCRIPTION:**

The Safety Element Update will implement goals and policies that address each of the following areas:

- A. Connected and Informed Communities
- B. Resilient and Equitable City
- C. Historic and Tribal Cultural Resources
- D. Thriving Natural Environments
- E. Critical City Services

**A. Connected and Informed Communities**

Community preparedness is critical for protection of physical safety, social cohesion, and continued economic vitality. In order for communities to be most prepared for a changing climate, knowledge of how a climate change hazard might affect their daily life, awareness of resources available to them, and ability to access needed services will be critical. A more informed community will be better prepared to respond to and recover from climate change events. Further, tighter knit communities with closer social connections between neighbors will be better able to disseminate information, assist each other in accessing resources, and bounce back from climate change impacts. A strong social fabric builds cohesiveness and

strength in community response. The City aims to help empower and support community connection building and serve as a resource for information and services.

Climate change hazards do not abide by jurisdictional boundaries. Climate resilience will require collaboration between the City and its regional partners. Through collaborating with other cities and the County, local universities, community groups, non-profits, tribal nations and regional organizations, the City will be able to both contribute to and benefit from regional knowledge and resources. Collaboration, communication and education will be key pillars in achieving local and regional climate resilience.

*Goal: Ensure communities are connected and informed to be best prepared for climate change.*

Policy CI-1: Provide easily accessible education resources and grow community awareness of climate change.

Policy CI-2: Enhance ability of communities to prepare for, respond to and recover from climate change impacts.

Policy CI-3: Strengthen the City's regional partnerships to leverage and expand available resources for climate resilient actions.

Policy CI-4: Collaborate with arts, cultural and creative sector to increase community awareness of and engagement with climate planning.

## B. Resilient and Equitable City

To build a truly resilient San Diego, existing inequities must be addressed, and an equitable plan for prioritizing investments must be developed. Integrating social equity across City operations, centering racial and social justice practices in outreach and strengthening community partnerships are critical to achieving these goals. The impacts of climate change will not be felt equally by all communities, as some are more vulnerable than others. Historic disinvestments and unjust systems have resulted in some communities having access to fewer resources and being disproportionately impacted by climate change. These communities will face greater exposure to climate change hazards and experience climate change related impacts first and worst. By supporting and uplifting the most vulnerable populations and ensuring that they are safe and healthy despite potential climate change impacts, we can build a stronger, more resilient and equitable City.

Through the development of the City's Climate Equity Index, communities most vulnerable to climate change have been identified. The Climate Equity Index measures the level of access to opportunity that residents have and assesses the degree of potential impact climate change may have on these areas. Thirty-five indicators, such as asthma rates, healthy food access, tree coverage and median income, were identified to assess access to opportunity. Census tracts with a score of very low, low, or moderate access to opportunity are referred to as Communities of Concern. Because the needs are greater in Communities of Concern, implementing climate adaptation and resilience strategies should be prioritized in these communities. In addition to other factors, resiliency strategies have been identified that deliver direct benefits, generate multiple benefits and build capacity within these communities.

*Goal: Plan for and build a resilient and equitable City.*

Policy RE-1: Prioritize resilience investments and implementation of strategies in Communities of Concern, as identified in the Climate Equity Index.

Policy RE-2: Foster vibrant, healthy, and sustainable communities.

Policy RE-3: Prioritize strategies with multiple benefits that increase the adaptive capacity of the City's most vulnerable communities.

Policy RE-4: Deepen community partnerships to support greater community involvement in resilience action and plan implementation.

Policy RE-5: Ensure vulnerable communities have resources necessary to respond to climate change impacts.

### C. Historic and Tribal Cultural Resources

San Diego is home to many historic and tribal cultural resources, which can take a wide variety of forms. These include buildings, structures, objects, districts, archaeological sites and artifacts, traditional cultural properties and tribal cultural resources, historic documents, and historical or cultural landscapes. All are important because they tell the story of our region, from when the ancestors of the Kumeyaay and Luiseño peoples first inhabited this area tens of thousands of years ago, up to the present day.

In the City's Climate Change Vulnerability Assessment, historic and tribal cultural resources were found to be highly vulnerable to all climate change hazards except heat. These resources could suffer severe damage, are irreplaceable when destroyed, and their historic and tribal cultural nature requires more thought, consideration, and oversight when implementing protective measures. As the loss or damage of these resources could result in the permanent loss of historic and tribal cultural resources that may be integral to the identity of San Diego, it is critical that we implement policies and adaptation strategies that can help protect them.

*Goal: Safeguard, preserve and protect historic and tribal cultural resources from the effects of climate change.*

Policy HTC-1: Preserve and protect historic and tribal cultural resources against climate change impacts.

Policy HTC-2: Foster partnerships and collaboration opportunities with tribal liaisons and partners.

Policy HTC-3: Honor and share traditional knowledge of land management and cultural significance.

Policy HTC-4: Incorporate climate change considerations into historic and tribal cultural planning and stewardship.

## D. Thriving Natural Environments

The City's natural and open spaces provide a multitude of benefits to the region and its residents. Open spaces and parks provide opportunity for active recreation, sports, and community gathering. Natural spaces provide critical habitat for endangered species and other wildlife. These spaces also provide valuable resilience benefits and services, such as cleaner air, flood water management and cooler neighborhoods. The protection of our existing natural spaces and expansion of green spaces in our communities will provide social, economic, and environmental benefits while better preparing our City for a changing climate.

*Goal: Support and prioritize thriving natural environments and enhance adaptability.*

Policy TNE-1: Protect environmental quality and biodiversity.

Policy TNE-2: Protect and improve the integrity of open space, habitat, and parks.

Policy TNE-3: Prioritize the implementation of nature-based climate change solutions wherever feasible.

Policy TNE-4: Prioritize installation of green infrastructure wherever feasible.

Policy TNE-5: Manage the coastline as a social, economic and environmental resource for current and future generations.

Policy TNE-6: Protect and expand the City's urban forest.

## E. Critical City Services

The City has completed a Climate Change Vulnerability Assessment in order to understand how climate change related hazards could affect assets and services owned and managed by the City. This Vulnerability Assessment found that many critical City assets and services may be vulnerable to climate change related hazards in the future. All of the hazards investigated—wildfire, extreme heat, flooding and drought, and sea level rise—pose potential risks to City assets and services. Damage, disruption, or failure of some of these City assets could have major consequences and impede the ability of the City to continue its services and protect public health and safety. Exposure to climate change related hazards could result in consequences such as delays in emergency response; impacts to City facilities; damage to historical, tribal cultural, or archaeological resources; or impacts to protected habitats/species. Implementing potential policies and adaptation strategies that will allow the City to maintain its assets and continue its services with minimal disruption is a key priority.

*Goal: Maintain and ensure minimal disruption to all critical City services in the face of climate change hazards.*

Policy CCS-1: Protect public health and safety.

Policy CCS-2: Secure and maintain water and wastewater supplies and services.

Policy CCS-3: Improve ability of infrastructure and built systems to withstand climate change shocks and stressors, while maintaining provision of essential services.

Policy CCS-4: Build City capacity to be responsive to future climate change related events and challenges.

Policy CCS-5: Consider cost, effectiveness, lifespan, and core benefits for adaptation strategy prioritization and implementation.

Policy CCS-6: Prepare City for upcoming funding opportunities from State, Federal, and grant programs to ensure City is competitive to secure funding.

## II. ENVIRONMENTAL SETTING:

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

## III. PROJECT BACKGROUND:

The Public Facilities, Services, and Safety Element serves as a policy guide to address the comprehensive public facilities, services, and safety needs of the City. It is one of ten elements of the City of San Diego's General Plan. The Safety Element is being updated to incorporate *Climate Resilient SD*, the City's comprehensive climate adaptation and resiliency plan, in accordance with State law.

## 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 pursuant to CEQA Guidelines Section 15162 and 15164 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 CEQA Guidelines Section 15164. Public review of this Addendum is not required pursuant to CEQA.

As shown below, the Safety Element Update 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 Safety 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 Safety Element Update. Thus, the City reviewed the Safety Element Update against the other nine elements of the General Plan to determine the Safety Element Update's consistency with what was previously analyzed.

### **Land Use and Community Planning**

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

The Safety Element Update will implement several policies that are in line with the Land Use Element vision for balanced communities and equitable development. Policy RE-2 calls for vibrant, healthy, and sustainable communities, while policies such as RE-1 and RE-5 call out the need to prioritize resilience investments and implement strategies in communities with the greatest needs, particularly in Communities of Concern, and to ensure that communities have the resources necessary to respond to climate change impacts. These policies echo similar policies in the Land Use Element which promote equitable development that takes into account community input and needs (see Land Use Element policies LU-A.2, LU-H.1, and LU-I.5). The new proposed policies also align with the Land Use Element's goals and policies to create an equitable distribution of public facilities, infrastructure, and services throughout all communities (see Safety Element policies RE-1 through RE-5, and Land Use Element policies LU-I.4 through LU-I.6). Therefore, the proposed Safety 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, while minimizing environmental and neighborhood impacts. In addition to addressing walking, bicycling, transit, and streets, the Mobility Element includes policies related to regional collaboration, parking, the movement of goods, and other components of the City's transportation system.

The proposed Safety Element Update complements and advances the goals and policies of the Mobility Element by implementing policies such as Policy CI-3: Strengthen the City's regional partnerships to leverage and expand available resources for climate resilient actions. The Safety Element Update also incorporates several proposed strategies that complement Mobility Element policies related to regional collaboration. Proposed strategies

in Climate Resilient SD include: Build regional resilience through collaboration with other local, regional, or State agencies, as well as community-based organizations and non-profits; and coordinate with local transit agencies for resilient public transit systems upgrades. New policies incorporated into the Update will also address the need to improve ability of infrastructure and built systems to withstand climate change shocks and stressors, while maintaining provision of essential services (Policy CCS-3), and potential strategies to plan for a climate ready transportation network. Thus, the proposed Safety Element Update is consistent with the Mobility Element, and there are no new significant environmental impacts not considered in the previous PEIR.

### **Urban Design Element**

The Urban Design Element's 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 proposed Safety Element Update incorporates 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, such as Policy TNE-4, which calls out the need to prioritize installation of green infrastructure wherever feasible. The proposed Safety Element Update would also support the Urban Design Element's goals to respect San Diego's natural environment and climate (see policies TNE-1 through TNE-7) and to maintain the historic resources that contribute to the City's identity through policies that promote the protection, preservation, and enhancement of the City's natural and cultural resources (see policies HTC-1 through HTC-4). Through implementation of these policies, the proposed Update would be consistent with and would facilitate urban design in accordance with the Urban Design Element. There would be 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 proposed Safety Element Update supports the goals and policies of the Economic Prosperity Element through policies such as TNE-5: Manage the coastline as a social, economic and environmental resource for current and future generations, and potential strategies to implement nature-based shoreline protection methods to protect areas subject to coastal flooding. The Update also incorporates potential strategies to develop a Coastal Resilience Master Plan that would identify locations for implementation of nature-based solutions to mitigate coastal flooding and erosion, improve coastal resiliency, protect habitat, and increase recreational opportunities for residents and visitors. Thus, the Safety Element Update is consistent with the Economic Prosperity Element and there are no new significant environmental impacts not considered in the previous PEIR.

## **Housing Element**

Providing the range of housing needed to serve the City's current and future population continues to be a great challenge. The Housing Element responds to this challenge with policies to guide the development and supply of adequate housing. The Housing Element aims to increase housing opportunities while enhancing the transportation and land use connection through an improved jobs-housing balance, and creating more compact and walkable communities.

The proposed Safety Element Update incorporates many goals and policies that are in line with the Housing Element's goal to enhance quality of life, as well as its objective to create vibrant, equitable communities. A major goal of *Climate Resilient SD* is to plan for and build a resilient and equitable city, and policies RE-1 through RE-5 all support this goal. The Proposed Update will also implement Policy CCS-1: Protect public health and safety, which is directly in line with the Housing Element objective to protect public health and safety. Proposed policies RE-2: Foster vibrant, healthy, and sustainable communities, and TNE-4: Prioritize installation of green infrastructure wherever feasible are also in line with the Housing Element goal to exemplify Sustainable Development & Growth, as well as the Housing Element objective to innovative green / sustainable building practices. Thus, the Safety Element Update is consistent with the Housing 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 Safety Element Update is consistent with the goals of the Recreation Element as it incorporates many goals, policies, and strategies that would support the City's parks and open space system. This includes proposed policies such as TNE-2: Protect and improve the integrity of open space, habitat, and parks and TNE-5: Manage the coastline as a social, economic and environmental resource for current and future generations, both of which support the Recreation Element's goal for a regional and citywide parks/open space system, including the bays, beaches, rivers, and other attractions, that gives our region identity, attracts tourism, and enriches the quality of life for residents and visitors. The proposed Update also incorporates policies (see policies HTC-1 through HTC-4) that are in line with Recreation Element policy RE-C.8: Develop programs to educate the public on the variety, importance, and recreational uses of the City's natural and cultural resources that are located in City parks and open space lands, as well as including individual strategies and policies such as Policy RE-2: Foster vibrant, healthy, and sustainable communities, that support the Recreation Element's goal for: 1) a City with a diverse range of active and passive recreational opportunities that meet the needs of each neighborhood/community and reinforces the City's natural beauty and resources, and 2) a system of pedestrian, bicycle, and equestrian paths linking communities, neighborhoods, parks, and the open space



system. Thus, the Safety 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 natural environment, that help define the City's identity, and that are relied upon for continued economic prosperity. Conservation is the most cost-effective strategy to ensure that there will be a reliable supply of the resources for present and future needs.

The proposed Safety Element Update incorporates several goals, policies, and strategies that support the goals and policies of the Conservation Element. The *Climate Resilient SD* plan as a whole addresses the Conservation Element's goal to be prepared for, and able to adapt to adverse climate change impacts, and the Proposed Update includes strategies addressing energy efficiency and sustainable design techniques, which is in line with the Conservation Element's goal to reduce the City's overall carbon dioxide footprint by improving energy efficiency, increasing use of alternative modes of transportation, employing sustainable planning and design techniques, and providing environmentally sound waste management. Proposed policies such as TNE-6: Protect and expand the City's urban forest will support the Conservation Element goal to protect and expand the City's urban forest, as well as its policy to reduce the urban heat island (CE-A.12). Proposed strategies and policies such as Policy CI-1: Provide easily accessible education resources and grow community awareness of climate change will also complement Conservation Element goals and policies related to environmental education. Additionally, proposed strategies address prioritizing the preservation, restoration and expansion of natural features such as habitat, open space, wetlands, kelp forests, marshes and vegetated buffers to increase resilience of natural systems, and continuing to implement and uphold the Multiple Species Conservation Program to preserve network of habitat and open space and to protect biodiversity; these are in line with the Conservation Element policy to protect, preserve, restore, and enhance important coastal wetlands and habitat (CE-C1). Thus, the Safety Element Update would be consistent with the goals of the Conservation Element, and there are no new significant environmental impacts not considered in the previous PEIR.

### **Historic Preservation Element**

The Historic Preservation Element guides the preservation, protection, restoration, and rehabilitation of historical and cultural resources within the City of San Diego. San Diego's rich and varied historical and cultural resources include buildings, structures, objects, landscapes, districts, archaeological sites, and traditional cultural properties that possess historical, scientific, architectural, aesthetic, cultural, or ethnic significance.

The proposed Safety Element Update would work together with the Historic Preservation Element to preserve and protect the City's historical and cultural resources by incorporating policies such as HTC-1, which calls out the need to preserve and protect historic and tribal cultural resources against climate change impacts. The proposed Safety Element Update would also promote the Historic Preservation Element's goal of increasing public education

about the importance of historical resources, and includes policy HTC-3: Honor and share traditional knowledge of land management and cultural significance, which would complement Historic Preservation Element policy HP-B.1 to foster greater public participation and education in historical and cultural resources. Thus, the proposed update to the Safety Element is consistent with the General Plan Historic Preservation Element, 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 purpose of the Noise Element is to protect people living and working in the City of San Diego from excessive noise.

Through policies such as RE-2, which calls out the need for sustainable communities, the proposed Safety Element Update supports the Noise Element's goal to minimize excessive motor vehicle traffic noise, as well as Noise Element policy NE-B.4: Require new development to provide facilities which support the use of alternative transportation modes such as walking, bicycling, carpooling and, where applicable, transit to reduce peak-hour traffic. The Safety Element Update will also complement the Noise Element's policy to promote the use of natural features such as berms and landscaping rather than conventional wall barriers where appropriate (Policy NE-B.7) by incorporating new strategies and policies such as TNE-4: Prioritize installation of green infrastructure wherever feasible. Therefore, the Safety 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.

### **VI. MITIGATION, MONITORING AND REPORTING PROGRAM INCORPORATED INTO THE PROJECT:**

The Final PEIR 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.

### **VII. SIGNIFICANT UNMITIGATED IMPACTS:**

There are no new significant impacts identified in conjunction with implementation of the

proposed Safety 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.



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October 21, 2021

Date of Final Report

ANALYST: **Moore**

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 October 21, 2021 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.