



THE CITY OF SAN DIEGO

MEMORANDUM

DATE: June 17, 2022

TO: Heidi Vonblum, Director, Planning Department

FROM: Rebecca Malone, AICP, Environmental Policy Program Manager, Planning Department

SUBJECT: Climate Action Plan Consistency for Plan- and Policy-Level Environmental Documents and Public Infrastructure Projects

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This memorandum is intended to address the preparation of the California Environmental Quality Act (CEQA) analysis of the greenhouse gas (GHG) emissions for plan- and policy-level documents, i.e., Community Plan Updates, Community Plan Amendments, Specific Plans, Ordinances, etc., as well as for public infrastructure projects.

**Background Information**

In December 2015, the City of San Diego City Council adopted a Climate Action Plan (CAP) that outlined the actions that the City would undertake to achieve its proportional share of State GHG emission reductions. In July 2022, the City Council adopted an update to the CAP which included the CAP Consistency Regulations, an amendment to the Land Development Code to ensure that all new development is consistent with the updated CAP. With the CAP Consistency Regulations, the City's CAP, as updated, is a qualified plan for the reduction of GHG emissions for use in cumulative impact analysis pertaining to development projects under CEQA Guidelines Section 15183.5. Pursuant to CEQA Guidelines Sections 15064(h)(3), 15130(d), and 15183(b), a project's incremental contribution to a cumulative GHG emissions effect may be determined not to be cumulatively considerable if it complies with the requirements of the CAP.

The CAP Consistency Regulations contain measures that are required to be implemented on a project-by-project basis to ensure that the specified emissions targets identified in the CAP, as updated, are achieved. Implementation of these measures would further ensure that new development is consistent with the CAP's assumptions for relevant CAP strategies toward achieving the identified GHG reduction targets. Projects for new development that are consistent with the CAP, as determined through compliance with the CAP Consistency Regulations, may rely on the CAP for the cumulative impacts analysis of GHG emissions. Projects for new development that are not consistent with the CAP must prepare a comprehensive project-specific analysis of GHG emissions, including quantification of

existing and projected GHG emissions and incorporation of the measures in the CAP Consistency Regulations to the extent feasible. Cumulative GHG impacts would be significant for any project that is not consistent with the CAP. The CAP Consistency Regulations may be updated to incorporate new GHG reduction techniques or to comply with later amendments to the CAP or local, State, or federal law.

### **Guidance for Assessing CAP Consistency for Plan- and Policy-Level Environmental Documents**

The environmental analysis for Plan- and Policy-Level Environmental Documents should address the ways in which the plan or policy is consistent with the goals and policies of the General Plan and CAP. Of primary importance are addressing Policies LU-A.7, ME-B.9, CE-J.2, and CE-J.3 from the General Plan, and Strategy 3 from the CAP, although all six strategies from the CAP should be discussed.

Plan- and Policy-Level Environmental Documents should also discuss the CAP Consistency Regulations, explaining that most new development (discretionary *and* ministerial) pursuant to plans and policies would be required to comply with the CAP Consistency Regulations, and would thus help achieve the GHG emissions reduction targets as specified in the CAP.

Plan- and Policy-Level Environmental Documents should also note that construction emissions were included in the CAP GHG emissions inventory and business-as-usual GHG emissions projections, and were, thus, accounted for in the CAP. Furthermore, California regulations limit construction equipment and vehicle idling, construction best management practices promote energy efficiency, and, generally, construction is short-term in nature. Construction emissions from the implementation of a plan or policy are not a large source of GHG emissions, but regardless, were accounted for in the CAP, as updated.

Plans and policies that are not consistent with the CAP must prepare a comprehensive analysis of GHG emissions, including quantification of existing and projected GHG emissions and incorporation of the measures in the CAP Consistency Regulations to the extent feasible. Cumulative GHG impacts would be significant for any plan or policy that is not consistent with the CAP.

### **Guidance for Assessing CAP Consistency for Public Infrastructure Projects**

The environmental analysis for public infrastructure projects should include a discussion of overall consistency with each of the strategies of the CAP, as updated. Specifically, the analysis should explicitly identify any project features that would meet CAP goals, as outlined below.

#### **Strategy 1: Decarbonization of the Built Environment**

For Strategy 1, the analysis should explain how the project would not conflict with the achievement of the decarbonization of the built environment. The City has adopted a goal to achieve zero emissions municipal buildings and operations by 2035. Any projects/project features that would reduce or eliminate the use of fossil fuels should be discussed.

The City is developing a Reach Code, which allows cities to exceed the State-level minimum requirements for building energy use and design. Upon adoption of the Reach Code, projects would have to comply with all requirements, which are anticipated to include building electrification requirements, electric vehicle charging requirements, and distributed energy generation and energy storage requirements.

#### Strategy 2: Access to Clean & Renewable Energy

For Strategy 2, the analysis should explain how the project would not conflict with the achievement of a goal of 100% renewable energy, and in some cases, may further that goal.

As outlined in Strategy 1, upon adoption of the Reach Code, projects would be required to comply with all the requirements of the Reach Code, which is anticipated to include distributed energy generation and energy storage requirements.

#### Strategy 3: Mobility & Land Use

For Strategy 3, the analysis should explain how the project would not conflict with the achievement of the Strategy 3 goals, and explain any project features that would further the goals of Strategy 3, such as providing or facilitating the delivery of:

- Bicycle improvements, including, but not limited to:
  - Green bike lanes
  - Sharrows
  - Buffered bike lanes
- Pedestrian ramps or other pedestrian crossing improvements
- Transit improvements

The analysis should note where any public infrastructure project would support new development that achieves the City's climate goals, specifically to provide housing and development located within Transit Priority Areas.

#### Strategy 4: Circular Economy & Clean Communities

For Strategy 4, the analysis should include a brief description of how the project will comply with the City's Construction and Demolition Debris Diversion Ordinance, if applicable. The analysis should note where project operations would generally not increase solid waste production, and thus, would not impede the achievement of this goal.

#### Strategy 5: Resilient Infrastructure and Healthy Ecosystems

For Strategy 5, the analysis should describe any project features that further the City's climate resiliency goals, such as:

- Replacement of any street trees that need to be removed
- Addition of street trees to the public right-of-way
- The offering of street trees to adjacent property owners

Implementation of any of the above measures would ensure that any project furthers the City's climate resiliency goals. For this strategy, the analysis should also explain how the project furthers climate resiliency, e.g., storm drain maintenance to prepare for greater prevalence of extreme rain events.

Strategy 6: Emerging Climate Action

For Strategy 6, the analysis should explain how the project does not conflict with the achievement of this strategy. Any project that includes implementing emerging climate actions, i.e., new GHG removal technologies, should include a discussion of that in the analysis.

Public infrastructure projects that are not consistent with the CAP must prepare a comprehensive analysis of GHG emissions, including quantification of existing and projected GHG emissions and incorporation of the measures in the CAP Consistency Regulations to the extent feasible. Cumulative GHG impacts would be significant for any public infrastructure project that is not consistent with the CAP.

Sincerely,



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cc: Kris McFadden, Interim Deputy Chief Operating Officer  
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