



**THE CITY OF SAN DIEGO**  
**M E M O R A N D U M**

**DATE:** May 27, 2021

**TO:** Jonathan Avila, RLA, QWEL, ASLA, Park Designer, Planning Department

**FROM:** Rebecca Malone, AICP, Senior Planner, Planning Department

**SUBJECT:** Parks Master Plan Environmental Review

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In May 2020, the Environmental Policy Section of the Planning Department prepared, in accordance with CEQA Guidelines Section 15164, an Addendum to the Program Environmental Impact Report (PEIR) for the 2008 General Plan (Attachment 1) for the Parks for All of Us initiative (herein referred to as the “project”). The City of San Diego had previously prepared and certified the General Plan PEIR (Project No. 104495/SCH No. 2006091032). The 2008 General Plan Recreation Element, which was analyzed in the General Plan PEIR, identified the need for a comprehensive Parks Master Plan. The proposed project fulfills the goals of the 2008 General Plan Recreation Element through the inclusion of a City of San Diego Parks Master Plan and an amendment to the General Plan Recreation Element.

Since the Addendum was prepared, the Planning Department has made various revisions to the Parks Master Plan. The proposed changes to the Parks Master Plan would not result in any new significant impacts that are substantially more severe than what was analyzed in the Addendum to the General Plan PEIR. Adoption of the revised Parks Master Plan and amended General Plan Recreation Element would not deprive the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect. Many of the revisions included clarifying language related to ensuring continued protections under the City’s Multiple Species Conservation Plan. Other revisions center around refinement to park standards and prioritization that would not result in any new significant changes to the environment.

Designating the Chollas Creek Watershed as a Regional Park is another new proposed action. This action is also consistent with the Addendum to the PEIR for the 2008 General Plan. The Parks Master Plan specifically calls for the need to identify and designate Regional Parks in Communities of Concern. The updated Recreation Element also states that “regional recreation facilities should be placed

equitably throughout the City, particularly in areas with the most need". The project is consistent with the analysis in the General Plan PEIR and there would be no new significant environmental impacts which were not already considered in the previous PEIR. Designating the Chollas Creek Watershed as a Regional Park would not result in any reasonably foreseeable changes to the physical environment. Any future projects within the designated regional parkland would be subject to CEQA review pursuant to CEQA Guidelines Section 15004, which provides direction to lead agencies on the appropriate timing for environmental review, as well as the provisions of the City's Land Development Code.

Furthermore, the proposed project is consistent with the Final PEIR for Complete Communities: Housing Solutions and Mobility Choices (SCH No. 201906003), which was certified on November 9, 2020. The Final PEIR includes environmental analysis of future parks and recreation facilities as well as recreational amenities added to the public right-of-way that could result from implementation of the Complete Communities: Housing Solutions or Mobility Choices programs.

Additionally, the new Citywide Parks Development Impact Fee does not identify any particular course of action with respect to the development of any particular parks project, and, thus, is not a "project" pursuant to CEQA Guidelines Sections 15378(b)(4) and (5). Pursuant to CEQA Guidelines Section 15378(b)(4), "project" does not include the creation of government funding mechanisms or other government fiscal activities which do not involve any commitment to any specific project which may result in a potentially significant physical impact on the environment. Pursuant to CEQA Guidelines Section 15378(b)(5), "project" does not include organizational or administrative activities of governments that will not result in direct or indirect physical changes in the environment. As such, this action is not subject to CEQA pursuant to CEQA Guidelines Section 15060(c)(3).



Rebecca Malone, AICP  
Senior Planner

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Attachments:

1. Addendum to the General Plan Program Environmental Impact Report

cc: Heidi Vonblum, Deputy Director, Planning Department