



County of San Diego

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Date: March 10, 2021

To: Planning Commission

From: Mike Madrid, Land Use/Environmental Planner

Re: **CEQA Guidelines, Section 15164(a) Addendum to the previously adopted Program Environmental Impact Report for the County of San Diego General Plan Update (Environmental Review Number 02-ZA-00; Sch. 2002111067) for Purposes of Consideration of the 2021 Safety Element Update and Environmental Justice Element, PDS2019-GPA-19-001 AND PDS2017-GPA-17-004, PDS2021-ER-21-00-002**

CEQA Guidelines Section 15164 allows an addendum to a previously certified or adopted environmental document to be prepared when only minor technical changes or additions are necessary or none of the conditions in Guidelines Section 15162 have occurred. The Program Environmental Impact Report (GPU EIR) for the County of San Diego General Plan Update (Environmental Review Number 02-ZA-001; Sch. 2002111067) is hereby amended by this 15164 letter for the 2021 Safety Element Update and Environmental Justice Element, PDS2019-GPA-19-001 AND PDS2017-GPA-17-004, PDS2021-ER-21-00-002.

Location: The project is located within the unincorporated areas of the County of San Diego within the First, Second, Third, Fourth and Fifth Supervisorial Districts.

Background: On August 3, 2011, the County of San Diego Board of Supervisors adopted a comprehensive update to the County of San Diego General Plan. The County's General Plan Update EIR was certified by the Board of Supervisors on August 3, 2011 (Environmental Review Number 02-ZA-00; State Clearinghouse Number 2002111067). The Safety Element was a part of the comprehensive General Plan update adopted by the Board of Supervisors on August 3, 2011. On March 15, 2017, the County of San Diego's Board of Supervisors adopted the 2017 Housing Element Update and Safety Element Update (PDS2016-GPA-16-003), which relied on an Addendum to the General Plan Update EIR. The Safety Element was updated to include a policy revision to the Fuel Management Program (Policy S-4.1) and to include support plans, such as Strategic Fire Plans, consistent with State law.

In accordance with State law (Government Code Section 65302), the County of San Diego has prepared an update to its Safety Element.

Consistent with California law, Senate Bill 1000 (SB 1000), the County has also prepared a new Environmental Justice Element to be part of the County's General Plan and reflect the County's efforts in addressing Environmental Justice.

Changes in project impacts:

Safety Element Update

The County's Safety Element consists of a Goals and Policies document, as well as an Implementation Plan. This Safety Element Update contains revisions and additions to the previously approved goals, policies and implementation programs that incorporate recently adopted State laws that require the following to be performed, updated, and included in a Safety Element:

1. Identify and update information related to:
 - Seismic and geologic hazards
 - Evacuation routes
 - Military installations
 - Peak-load water supply requirements
 - Minimum road widths and clearances around structures
 - Flood hazards
 - Fire hazards.
2. Prepare a climate change vulnerability assessment and develop climate adaptation and resilience strategies.
3. Identify residential developments in any hazard area that does not have at least two evacuation routes.

These modifications would not involve substantial changes in the magnitude of impacts identified in the Program EIR for the County of San Diego General Plan Update (Environmental Review Number 02-ZA-001; State Clearinghouse Number 2002111067) and would not create new potentially significant impacts that would require mitigation. This conclusion is based on the following analysis:

Since the County's GPU EIR was certified, there are no substantial changes in the project or with respect to the circumstances under which the project is undertaken and/or "new information of substantial importance" that shows the project will cause one or more new significant environmental effects or a substantial increase in the severity of previously identified significant effects. The Safety Element Update includes several revisions and additions to goals, policies, and implementation programs that are consistent with State law (refer to Section 5 of the checklist for a summary of Safety Element revisions).

Environmental Justice Element

Consistent with requirements of SB 1000, the County has added a new Environmental Justice Element to the County's General Plan Update that contains goals, policies, and implementation programs that identify:

1. Disadvantaged communities, also known as Environmental Justice Communities, within the County's General Plan planning area.

2. Objectives and policies to:

- a. Reduce unique or compounded health risks in Environmental Justice Communities through assessing conditions in Environmental Justice Topic Areas that include but are not limited to:
 - i. Reducing pollution exposure and improving air quality
 - ii. Promoting public facilities, defined as public improvements, public services, and community amenities
 - iii. Promoting food access
 - iv. Promoting safe and sanitary homes
 - v. Promoting physical activity
- b. Promote civil engagement in public decision making.
- c. Prioritize improvements and programs to address the needs of Environmental Justice Communities.

As provided by State Government Code 65302(h), the Environmental Justice Element has the same weight as the mandatory elements of the General Plan and is internally consistent with the other elements.

The addition of this Element to the General Plan would not involve substantial changes in the magnitude of impacts identified in the Program EIR for the County of San Diego General Plan Update (Environmental Review Number 02-ZA-001; State Clearinghouse Number 2002111067) and would not create new potentially significant impacts that would require mitigation. This conclusion is based on the following analysis:

Since the County's GPU EIR was certified, there are no substantial changes in the project or with respect to the circumstances under which the project is undertaken and/or "new information of substantial importance" that shows the project will cause one or more new significant environmental effects or a substantial increase in the severity of previously identified significant effects. The Environmental Justice Element includes goals, policies, and implementation programs that are consistent with State law.

Finding: It is the finding of Planning & Development Services that the previous environmental document as herein amended may be used to fulfill the environmental review requirements of the current project. Because the current project meets the conditions for the application of State CEQA Guidelines Section 15164, preparation of a new EIR or ND is not required. Discretionary processing of the 2021 Safety Element Update and Environmental Justice Element, PDS2019-GPA-19-001 AND PDS2017-GPA-17-004, PDS2021-ER-21-00-002, may now proceed with the understanding that any substantial changes in the proposal may be subject to further environmental review.