RECON

Greenhouse Gas Analysis for the Southwest Village Specific Plan San Diego, California PRJ-0614791

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ATTACHMENT

1: Climate Action Plan Consistency for Plan- and Policy-level Documents and Public Infrastructure Projects

Acronyms and Abbreviations

AB	Assembly Bill
BAU	business as usual
CAFE	Corporate Average Fuel Economy
CalEEMod	California Emissions Estimator Model
CALGreen	California Green Building Standards Code
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CARB	California Air Resources Board
CBC	California Building Code
CEC	California Energy Commission
CEQ	Council on Environmental Quality
CEQA	California Environmental Quality Act
CH_4	methane
City	City of San Diego
CO_2	carbon dioxide
CPU	Community Plan Update
EO	Executive Order
EVA	emergency vehicle access
FEIR	Final Environmental Impact Report
GHG	greenhouse gas
GWP	global warming potential
IPCC	Intergovernmental Panel on Climate Change
MHPA	Multi-Habitat Planning Area
MMT CO_2E	million metric tons carbon dioxide equivalent
mpg	miles per gallon
MPO	Metropolitan Planning Organizations
MT CO_2E	metric tons of carbon dioxide equivalent
N_2O	nitrous oxide
OMCP	Otay Mesa Community Plan
OS	Operating System
RPS	Renewables Portfolio Standard
RTP	Regional Transportation Plan
SANDAG	San Diego Association of Governments
SB	Senate Bill
SCS	Sustainable Communities Strategy
SDG&E	San Diego Gas & Electric
SDMC	San Diego Municipal Code
Specific Plan	Southwest Village Specific Plan
TPA	Transit Priority Area
U.S. EPA	U.S. Environmental Protection Agency
VMT	vehicle miles traveled
VTM	vesting tentative map

Executive Summary

The purpose of this report is to provide a programmatic evaluation of the potential greenhouse gas (GHG) impacts resulting from development of the proposed Southwest Village Specific Plan (Specific Plan) in addition to a project-level GHG analysis for the proposed Vesting Tentative Map (VTM) 2188969 and associated project-level components. Impacts are addressed consistent with the City of San Diego's (City) 2022 Significance Thresholds which reflect adoption of the City's 2022 Climate Action Plan (CAP) and associated CAP Consistency Regulations set forth in the San Diego Municipal Code (SDMC) Chapter 14, Article 3, Division 14.

This report addresses consistency with the City's CAP and addresses the City's 2022 CEQA thresholds of significance for both the proposed VTM and the Specific Plan. The VTM and associated project-level components are evaluated at the project-level while implementation of the Specific Plan is evaluated at a program-level consistent with the City's CAP Consistency for Plan- and Policy-Level Environmental Documents and Public Infrastructure Projects Memorandum dated June 17, 2022 (Attachment 1).

Program-level Components

The Specific Plan boundary encompasses approximately 490 acres, would allow up to 5,130 attached and detached residences, and would facilitate creation of a new village anchored by up to 175,000 square feet of commercial and retail uses in a mixed-use village core. The Specific Plan would provide public facilities including dedication of a new elementary school, approximately 36 acres of developed parks in addition to trails, natural open space, and habitat conservation.

GHG impacts associated with adoption of the Specific Plan is evaluated at a program-level, consistent with the City's 2022 CEQA thresholds (City of San Diego 2022a) for plan- and policy-level environmental documents. The program-level analysis focuses on Specific Plan consistency with strategies in the CAP in addition to consistency with key General Plan policies. The program-level analysis presented in this report is consistent with the City's CAP, which is a qualified CAP prepared in conformance with the guidelines and recommendations established within the California Global Warming Solutions Act of 2006 – Assembly Bill 32 (AB 32), Senate Bill 97 (SB 97), and California Environmental Quality Act (CEQA).

The Specific Plan would be consistent with the City's CAP. The proposed land uses, including a mixed-use core with a mobility hub, and proposed Specific Plan policies and design standards promote the use of public transit, biking, and walking, which would reduce project-related and regional vehicle miles traveled (VMT) by reducing the need to drive a motor vehicle and shortening vehicle trip lengths. Additionally, all future development within the Specific Plan would be subject to the City's GHG regulations in effect at the time development is proposed, which would ensure GHG emissions are minimized consistent with CAP projections.

GHG emissions associated with the Specific Plan are also viewed in light of the GHG emissions analysis contained in the Otay Mesa Community Plan (OMCP) Final Environmental Impact Report

(FEIR) in 2014 (City of San Diego 2013), which found that impacts related to GHG emissions would be significant. However, since adoption of the OMCP FEIR, the City adopted a qualified CAP which evaluated buildout of adopted land uses in the City, including land use assumptions in the OMCP which envisioned up to 5,880 units within the Specific Plan area. The Specific Plan would authorize up to 5,130 within the Specific Plan, which would be slightly less than what was assumed in the OMCP. Therefore, in light of adoption of the City's CAP which accounted for these land uses and Specific Plan consistency with the CAP, GHG impacts at the program-level would be less than significant.

Project-level Components

A VTM, Site Development Permit, Multi-Habitat Planning Area Boundary Line Adjustment, among other discretionary actions, are requested in order to develop approximately 61 acres within Planning Areas 8 through 14 (Phase 1) to implement a portion of the residential components of the Specific Plan. The VTM 2188969 identifies up to 920 residential dwelling units, consisting of 142 multi-family detached (under 20 dwelling units per acre), 498 multi-family attached units (under 20 dwelling units per acre), and 280 multi-family units (over 20 dwelling units per acre). The 142 multi-family detached units are conservatively calculated as single-family units for purposes of the environmental analysis and trip generation. The VTM includes the construction of Beyer Boulevard. In addition, the VTM includes grading within Planning Areas 15 to 20 (Phase 2) in order to provide balanced cut and fill grading quantities. Other project-level improvements are also proposed, including Caliente Avenue, drainage outfalls, a pump station/sewer lift station, emergency vehicle access (EVA) road, as well as grading in Phase 4 in preparation of future development and trails and sewer and water infrastructure improvements outside of the Specific Plan boundary. The VTM was evaluated consistent with the City's 2022 CEQA Significance Determination Thresholds (City of San Diego 2022a). The VTM has provided the required pedestrian amenities, trees, and bicycle charging infrastructure consistent with the requirements of the City's CAP Consistency Regulations detailed in SDMC Chapter 14, Article 3, Division 14.

1.0 Introduction

The City of San Diego (City) certified a Final Environmental Impact Report for the Otay Mesa Community Plan Update in 2014 (FEIR). The FEIR disclosed potential greenhouse gas (GHG) emission impacts that would result from implementing the Otay Mesa Community Plan Update (CPU) and presented mitigation measures to address impacts. The FEIR concluded that future projects implemented in accordance with the CPU would need to demonstrate consistency with applicable GHG plans, policies, and regulations, but nonetheless, even with adherence to the CPU's Mitigation Framework, the City's General Plan, and CPU policies, GHG emissions from implementing projects could still be significant and unavoidable.

The purpose of this GHG study is to determine potential GHG impacts that may result from the implementation of the Southwest Village Specific Plan (Specific Plan) project. The Specific Plan implements the Otay Mesa Community Plan, which calls for the preparation of a specific plan for the entirety of the Specific Plan area "prior to consideration of any comprehensive development and rezoning proposals."

The analysis for the Specific Plan is conducted at a program level to address potential GHG impacts associated with the buildout of the entirety of the Specific Plan, even though the entire Specific Plan is not proposed for implementation at this time. Future development proposals in the Specific Plan area would require discretionary approval and be subject to additional CEQA review, including project-specific analysis to ensure consistency with the City's Climate Action Plan (CAP) and CAP Consistency Regulations defined in SDMC Chapter 14, Article 3, Division 14. In addition to the Specific Plan, the project includes the entitlements to complete the first phase of development. The first phase of development consists of 920 residential dwelling units along with supporting grading, landscaping, and infrastructure improvements. Impact analysis for both the Specific Plan (i.e., program-level analysis) and the first phase of development (i.e., project-level analysis) are addressed consistent with the City of San Diego's (City) 2022 Significance Thresholds which reflect adoption of the City's 2022 Climate Action Plan (CAP) and CAP Consistency Regulations set forth in the San Diego Municipal Code Chapter 14, Article 3, Division 14.

1.1 Understanding Global Climate Change

To evaluate the incremental effect of the project on statewide GHG emissions and global climate change, it is important to have a basic understanding of the nature of the global climate change problem. Global climate change is a change in the average weather of the earth, which can be measured by wind patterns, storms, precipitation, and temperature. The earth's climate is in a state of constant flux with periodic warming and cooling cycles. Extreme periods of cooling are termed "ice ages," which may then be followed by extended periods of warmth. For most of the earth's geologic history, these periods of warming and cooling have been the result of many complicated interacting natural factors that include volcanic eruptions that spew gases and particles (dust) into the atmosphere; the amount of water, vegetation, and ice covering the earth's surface; subtle changes in the earth's orbit; and the amount of energy released by the sun (sun cycles). However, since the beginning of the Industrial Revolution around 1750, the average temperature of the earth has been increasing at a rate that is faster than can be explained by natural climate cycles alone.

With the Industrial Revolution came an increase in the combustion of carbon-based fuels such as wood, coal, oil, natural gas, and biomass. Industrial processes have also created emissions of substances not found in nature. This in turn has led to a marked increase in the emissions of gases shown to influence the world's climate. These gases, termed "greenhouse" gases, influence the amount of heat trapped in the earth's atmosphere. Recently observed increased concentrations of GHGs in the atmosphere appear to be related to increases in human activity. Therefore, the current cycle of "global warming" is believed to be largely due to human activity. Of late, the issue of global warming or global climate change has arguably become the most important and widely debated environmental issue in the United States and the world. Because it is believed that the increased GHG concentrations around the world are related to human activity and the collective of human actions taking place throughout the world, it is quintessentially a global or cumulative issue.

1.2 Greenhouse Gases of Primary Concern

There are numerous GHGs, both naturally occurring and manmade. Each GHG has variable atmospheric lifetime and global warming potential (GWP). The atmospheric lifetime of the gas is the

average time a molecule stays stable in the atmosphere. Most GHGs have long atmospheric lifetimes, staying in the atmosphere hundreds or thousands of years. GWP is a measure of the potential for a gas to trap heat and warm the atmosphere. Although GWP is related to its atmospheric lifetime, many other factors including chemical reactivity of the gas also influence GWP. GWP is reported as a unitless factor representing the potential for the gas to affect global climate relative to the potential of carbon dioxide (CO_2). Because CO_2 is the reference gas for establishing GWP, by definition its GWP is 1. Although methane (CH_4) has a shorter atmospheric lifetime than CO_2, it has a 100-year GWP of 28; this means that CH_4 has 28 times more effect on global warming than CO_2 on a molecule-by-molecule basis.

The GWP is officially defined as (U.S. Environmental Protection Agency [U.S. EPA] 2010):

> The cumulative radiative forcing—both direct and indirect effects—integrated over a period of time from the emission of a unit mass of gas relative to some reference gas.

GHG emissions estimates are typically represented in terms of equivalent metric tons of CO_2 (MT CO_2E). CO_2E emissions are the product of the amount of each gas by its GWP. The effects of several GHGs may be discussed in terms of MT CO_2E and can be summed to represent the total potential of these gases to warm the global climate. Table 1 summarizes some of the most common GHGs.

It should be noted that the U.S. EPA and other organizations update the GWP values they use occasionally. This change can be due to updated scientific estimates of the energy absorption or lifetime of the gases or to changing atmospheric concentrations of GHGs that result in a change in the energy absorption of one additional ton of a gas relative to another. The GWPs shown in Table 1 are the most current. However, it should be noted that in the California Emissions Estimator Model (CalEEMod) CH_4 has a GWP of 21 and nitrous oxide (N_2O) has a GWP of 310, and these values were used for this analysis.

All of the gases in Table 1 are produced by both biogenic (natural) and anthropogenic (human) sources. These are the GHGs of primary concern in this analysis. CO_2 would be emitted by the project due to the combustion of fossil fuels in vehicles (including construction), from electricity generation and natural gas consumption, water use, and from solid waste disposal. Smaller amounts of CH_4 and N_2O would be emitted from the same project operations.

Table 1
Global Warming Potentials and Atmospheric Lifetimes
(years)

Gas	Atmospheric Lifetime (years)	100-year GWP	20-year GWP
Carbon dioxide (CO_2)	50–200	1	1
Methane (CH_4)*	12.4	28	84
Nitrous oxide (N_2O)	121	265	264
HFC-23	222	12,400	10,800
HFC-32	5.2	677	2,430
HFC-125	28.2	3,170	6,090
HFC-134a	13.4	1,300	3,710
HFC-143a	47.1	4,800	6,940
HFC-152a	1.5	138	506

Table 1 Global Warming Potentials and Atmospheric Lifetimes (years)			
Gas	Atmospheric Lifetime (years)	100-year GWP	20-year GWP
HFC-227ea	38.9	3,350	5,360
HFC-236fa	242	8,060	6,940
HFC-43-10mee	16.1	1,650	4,310
CF_4	50,000	6,630	4,880
C_2F_6	10,000	11,100	8,210
C_3F_8	2,600	8,900	6,640
C_4F_{10}	2,600	9,200	6,870
c-C_4F_8	3,200	9,540	7,110
C_5F_{12}	4,100	8,550	6,350
C_6F_{14}	3,100	7,910	5,890
SF_6	3,200	23,500	17,500
SOURCE: Intergovernmental Panel on Climate Change (IPCC) 2014. GWP = growth warming potential			

2.0 Project Description

The Southwest Village Specific Plan (Specific Plan) provides a comprehensive policy framework intended to guide future development in Southwest Village, consistent with the Otay Mesa Community Plan (OMCP) and City of Villages Strategy. The Specific Plan boundary encompasses approximately 490 acres, would allow up to 5,130 attached and detached residences, and would facilitate creation of a new village anchored by up to 175,000 square feet of commercial and retail uses in a mixed-use village core. The Specific Plan would provide public facilities including dedication of a new elementary school, approximately 36 acres of developed parks in addition to an extensive trail network, natural open space and habitat conservation. Access to the Specific Plan area would be via two main access points, Caliente Avenue to the north and from an extension of Beyer Boulevard to the west, connecting the Specific Plan area to San Ysidro. The project's regional location is shown on Figure 1 and Figure 2 shows an aerial photograph of the project area.

The Specific Plan identifies a range of allowable residential densities for each planning area to allow for flexibility in future planning and design. The following land use designations are proposed:

- Medium-Low Density Residential allowing 8 to 22 dwelling units per acre
- Medium Density Residential allowing 15 to 29 dwelling units per acre
- High Density Residential allowing 20 to 44 dwelling units per acre
- Mixed-Use allowing commercial and retail uses at a maximum Floor Area Ratio (FAR) of 3.0 and multi-family attached residential units at a density range of 30 to 62 dwelling units per acre

The Specific Plan development concept is shown on Figure 3. Implementation of the Specific Plan would require a number of discretionary approvals including an amendment to the Otay Mesa Community Plan (OMCP) to remove the Neighborhood Village designation and designate Specific

Plan land uses and circulation changes, a rezone to implement Specific Plan land uses, and a Multi-Habitat Planning Area (MHPA) Boundary Adjustment.

The following are buildout assumptions consistent with the Specific Plan land use framework:

- 1,424 single-family residential units
- 2,234 multi-family units under 20 dwelling units per acre
- 1,472 multi-family units over 20 dwelling unit per acre
- Up to 175,000 square feet of commercial/retail

The Specific Plan would be implemented in phases as detailed in Figure 4. The Planning Area phasing represented in Figure 4 is conceptual and implementation may occur in any order provided services are provided concurrent with development. This air quality report analyzes implementation of the Specific Plan at a program-level considering buildout of all future phases of the Specific Plan. Anticipated grading phasing is also identified, as shown in Figure 5.

2.1 Program-level Components

Program-level components of the Specific Plan would involve future site-specific tentative maps and grading plans to be processed within Planning Areas 1 through 5 and 15 through 27 (see Figure 4). As future Planning Areas are built, improvements would be constructed concurrently including but not limited to internal roadways, parks, water and sewer lines, and trail alignments (see Figure 6 for the proposed trail network). Two permanent sewer pump stations would ultimately be required within the program-level area, including one in the southeastern portion of the Specific Plan area (Planning Area 30) and a second pump station within the southern tip of Planning Area 5 (see Figure 7 for the anticipated location of permanent sewer lift stations). While the project-level rough grading accounts for grading within Phase 2 Planning Areas and the future permanent sewer pump station area in Planning Area 30, operational and odor emissions are evaluated at the program-level for both permanent sewer-lift stations, since specific designs for the pump stations are not available at this time.

2.2 Project-level Components

A Vesting Tentative Map (VTM), Site Development Permit, and Multi-Habitat Planning Area Boundary Adjustment is requested in order to develop approximately 61 acres within Planning Areas 8 through 14 to implement a portion of the residential components of the Specific Plan.

Components of the Specific Plan evaluated at the project-level are depicted on Figure 7 and include construction and operation of Phase 1 of the residential development (Planning Areas 8 through 14) in addition to infrastructure improvements, grading, trail improvements, landscaping and restoration, and other project design features. Implementation of the project-level components is detailed below.

2.2.1 Residential Components

The residential components evaluated at the project-level include construction and operation of Phase 1 which includes Planning Areas 8 through 14. These Planning Areas are addressed in the VTM, which identifies up to 920 residential dwelling units, including 142 multi-family detached units (under 20 dwelling units per acre), 498 multi-family attached units (under 20 dwelling units per acre), and 280 multi-family attached units (over 20 dwelling units per acre). Implementation of residential components would occur in phases as detailed below.

2.2.1.1 Phase 1a

Phase 1a would involve construction of access to the Specific Plan area via Caliente Avenue and Central Avenue in addition to construction of the first 200 residential units. The site plan for Phase 1a is depicted on Figure 8. The Caliente Avenue extension south of its existing terminus to Central Avenue may be constructed by another developer or this project; this access is included as part of the project description in the event this project proceeds first. Phase 1a would involve construction of the first 200 residential units within Planning Areas 8 through 10 in addition to a temporary sewer lift station as depicted on Figure 8. Due to the area topography in relation to sewer treatment, a temporary sewer pump station would be required to serve these first 200 units until such time permanent sewer and water lines are constructed.

2.2.1.2 Phase 1b

Phase 1b would involve construction of up to an additional 499 units for a total of 699 residential units. The anticipated site plan for this phase is depicted on Figure 8. As part of this phase, an emergency only vehicle access (EVA) road would be improved to provide an EVA road for residents. Refer to Section 2.2.2.1.e. for additional details about the EVA road. Phase 1b would also require the construction of a temporary sewer lift station as depicted in Figure 8.

2.2.1.3 Phase 1c

Phase 1c would involve construction of the Beyer Boulevard extension in addition to the remaining 221 residential units within Planning Areas 8 through 14. Internal to the Specific Plan, implementation of the project-level areas would include construction of internal streets within Planning Areas 8 through 14. Refer to Figure 8 for the Phase 1c residential component and Figures 9.1 through 9.5 for Beyer Boulevard.

2.2.1.4 Phase 2

Within Phase 2 areas of the Specific Plan, the project-level analysis assumes rough grading to support a balanced grading operation. Additionally, Phase 2 includes implementation of primitive trails and trail restoration south of the Specific Plan area (see Figure 5). Future site-specific grading and development plans would need to be evaluated within Phase 2 areas as future project-level components are proposed.

2.2.1.5 Phase 4

Rough grading would be conducted within portions of Phase 4 areas, primarily supporting grading for Caliente Avenue, south of Central Avenue, and future residential development within Planning Area 7. Future site-specific grading and development plans would be required within Phase 4 areas as development is proposed.

2.2.2 Infrastructure Improvements

2.2.2.1 Roadway Improvements

a. Caliente Avenue and Central Avenue

Access to proposed Phase 1a residential development would require construction of Caliente Avenue north of the Specific Plan boundary from its current terminus in Otay Mesa, south to the planned connection with Central Avenue. Phase 1a would include construction of this segment of Caliente Avenue as well as Central Avenue west of Caliente Avenue. Caliente Avenue south of Central Avenue is part of the Phase 4 component.

b. Beyer Boulevard

Implementation of the project-level areas would require construction of an extension of Beyer Boulevard providing access from San Ysidro to the Specific Plan area (see Figures 9.1 through 9.5).

Beyer Boulevard East

As detailed in the Specific Plan, Beyer Boulevard within the Specific Plan boundary is referred to as Beyer Boulevard East and would be constructed as a modified 4-lane Urban Major.

Beyer Boulevard West

The extension of Beyer Boulevard West of the Specific Plan from Enright Drive to West Avenue is referred to as Beyer Boulevard West, which is planned as a modified 4-lane Urban Collector. Although planned as a modified 4-lane Urban Collector, the roadway is constrained by environmental resources and the Specific Plan specifies that this segment would be built with 2 instead of 4 lanes (see Figure 9.1). All manufactured slopes surrounding Beyer Boulevard would be revegetated with native plant species

The proposed Beyer Boulevard West extension would incorporate wildlife movement features including undercrossings, an overcrossing, and wildlife fencing along both sides of the road. Along the western extent of the proposed Beyer Boulevard extension a 6-foot-tall masonry wall would be constructed on the north side of the road to provide separation and noise attenuation from the adjacent habitat. Two San Diego Gas and Electric (SDG&E) access points with gates are proposed along Beyer Boulevard to provide ongoing access to SDG&E easements and power lines within the surrounding open space. A number of retaining walls have been incorporated into the roadway design largely to limit habitat impacts. Retaining walls include 4-foot to 12-foot retaining walls along

the north and south sides of Beyer Boulevard to minimize impacts to conserved properties (see Figure 9.2).

Beyer Boulevard between Otay Mesa Road and Enright Drive (San Ysidro)

As detailed in Figure 9.3, the current Beyer Boulevard in San Ysidro between Otay Mesa Road and Enright Drive is proposed to be improved with revised striping within the existing right-of-way limits during Grading Phase 1b. This is an interim improvement that would ensure adequate roadway functioning until the final roadway improvement is implemented as part of Phase 4 of the Specific Plan.

The limits of disturbance for this segment assume a wider area in anticipation of the requirement to widen this segment to 4 lanes to its ultimate improvement width which would require acquisition of right-of-way from the San Ysidro School District. The ultimate Beyer Boulevard improvement between Enright Drive and Beyer Boulevard West is depicted on Figure 9.4. The required timing for this improvement corresponds to the implementation of Phase 4 of the Specific Plan prior to issuance of occupancy permits for the 3,301st dwelling unit (after construction of an elementary school and a 17.6-acre public park), although it may be implemented sooner.

As detailed in Figure 9.5, the ultimate widening of Beyer Boulevard between Enright Drive and Otay Mesa Road would include construction of an approximately 6,900-linear-foot retaining wall ranging in height from 1 to 16 feet at its highest point located along the northern side of the road adjacent to the San Ysidro School District property.

c. State Route 905 and Caliente Avenue Improvements

The project proposes improvements to the SR-905 and Caliente Avenue interchange. The improvements detailed below shall be completed and operational prior to occupancy of the 201st dwelling unit.

SR-905 Westbound On-Ramp Widening

Widening the westbound SR-905 On-Ramp at Caliente Avenue is required to ensure adequate roadway operations with implementation of Phase 1 of the project. This improvement involves adding a lane within the existing California Department of Transportation (Caltrans) right-of-way (Figure 10.1). Restriping and traffic signal modifications within the existing Caliente Avenue is also proposed.

Restriping and Signal Modifications within the Caliente Avenue Bridge over SR-905

Intersection reconfiguration of Caliente Avenue/SR-905 westbound ramps are proposed to install a second northbound left-turn lane (through re-striping on the bridge over SR-905), construct a second receiving lane to the on-ramp, and restripe the number one left-turn lane from 100 feet of storage to 300 feet of storage (Figure 10.2). Traffic signal modifications, designed to the satisfaction of the City Engineer and Caltrans Engineer, may also be required.

d. West Avenue and Street A

Internal to the Specific Plan, Phase 1b would also include construction of West Avenue and Street A to provide access to residential development areas.

e. Southern Emergency Access Road

The project is subject to the City's Fire Protection and Prevention Regulations (SDMC Section 511.0104), which adoped the 2022 California Fire Code, Appendix D, Section D106.2, "Multiple-Family Residential Developments with Significant Fire Risk" which states that multi-family residential projects having more than 200 dwelling units shall be provided with two separate and approved fire apparatus access roads regardless of whether they are equipped with an approved automatic sprinkler system. Accordingly, the project requires a secondary access route prior to occupancy of the 200th unit. The secondary emergency access is proposed to be provided through either the construction of Beyer Boulevard or through improving an existing utility road south of the Specific Plan area to an EVA road that meets secondary emergency access requirements (see Figure 10.3). The Beyer Boulevard connection is required to be operational prior to occupancy of the 700th unit for transportation and circulation purposes.

In the event the EVA road is implemented as a component of this project, improvements would involve grading, scraping, and placement of surfacing including concrete, asphalt, and/or decomposed granite or gravel. The road width would be 20 feet wide except in one location it would narrow to 14 feet to avoid sensitive environmental resources. Grading is required along portions of the road to reduce the steepness and achieve a maximum 15 percent grade. Approximately 1.99 acres of grading would be required with the remaining disturbance limited to scraping the road to achieve a consistently flat surface. Approximately 0.74 acre of the roadway would require concrete surfacing in areas that would be at a 15 percent grade. A 0.12-acre portion of the road would require asphalt due to steep grades, while the remaining portions of the road (approximately 2.09 acres) would be surfaced with decomposed granite or gravel for stabilization. Grading quantities include approximately 6,780 cubic yards of cut and 8,220 cubic yards of fill, which is captured as part of the overall project-level grading quantities reported in Section 2.2.3 due to grading balancing.

The EVA road would provide secondary emergency only vehicle access for up to the first 699 units within Phase 1. Ultimately, after buildout of Phase 2 residential components and public roadways including South Caliente Avenue, the EVA road access would be provided from the intersection of South Caliente Avenue and D Street. Access to the EVA road would be gated to prohibit public vehicular access; however, pedestrian and non-motorized bicycles would be permitted along the EVA road to allow connection to the proposed primitive trail network.

2.2.2.2 Water and Sewer Improvements

As shown in Figure 8, a temporary sewer pump station would be installed to serve the first 200 residential units. Additionally, as shown in Figure 8, a second temporary sewer pump station would be installed to serve Phase 1b. Water and sewer lines would ultimately be constructed within Beyer Boulevard concurrent with the construction of the Beyer Boulevard extension. After construction of Beyer Boulevard and installation of off-site water and sewer line connections (shown in Figure 11),

the temporary pump station would be removed, and residential units would be connected to the permanent water and sewer facilities.

Water and sewer infrastructure would include the construction of approximately 5,176 linear feet of sewer pipelines and 4,987 linear feet of water pipelines. A 16-inch water line connection would extend west within existing Beyer Boulevard in San Ysidro and north within Otay Mesa Road and Otay Mesa Place connecting to the Princess Park Pump Station located at 1740 Masterson Lane (see Figure 11). Sewer line improvements would require construction of a pipeline within East Beyer Boulevard and Center Street connecting to existing sewer lines. Construction of water and sewer lines would require installation using a backhoe straddling the new pipeline installation trench, requiring a disturbance width of 20 feet along pipeline installation locations.

2.2.3 Grading

The project-level grading component includes grading within Phase 1 areas (Planning Areas 8 through 14), the Beyer Boulevard extension, the EVA road, and off-site improvement areas. Rough grading areas include Phase 2 (Planning Areas 15 to 20) and Phase 4 (a portion of Planning Area 1 and Planning Area 7). Grading volumes include 1,936,352 cubic yards of cut and 1,850,224 cubic yards of fill, with anticipated export volumes of approximately 86,128 cubic yards, which would be placed within rough grading areas located within Planning Areas 15 through 18, or used for grading balancing for the EVA road and Phase 4 areas.

Grading volumes for Phase 4 are included in the overall grading volumes discussed above, but individually include 22,500 cubic yards of cut and 342,500 cubic yards of fill originating from other portions of the project site. Grading volumes for the EVA road are similarly included in the overall grading volumes discussed above, but individually include 6,780 cubic yards of cut and 8,220 cubic yards of fill, with anticipated import volumes of 1,440 cubic yards coming from other portions of the project site. Anticipated grading phasing is depicted on Figure 5. As shown, grading would be implemented in phases, with Phase 1 including grading to allow the development of up to 920 residential units, Phase 2 including the rough grading areas, the EVA road phase including grading within the EVA road area, the Beyer Boulevard phase includes grading for the Beyer Boulevard extension and off-site improvements are identified as their own phase.

2.2.4 Trail Improvements

Consistent with the OMCP Recreation Element Policy 7.2-5, the final trail alignments within the Specific Plan area were to be finalized and analyzed with future specific plans and project-specific proposals. Due to the Specific Plan connection to the surrounding OMCP conceptual trail network, the overall trail network surrounding the Specific Plan area was evaluated as part of the project. The proposed trail networks evaluated and implemented as part of the project-level components include those portions of the perimeter trail located adjacent to Planning Areas 9, 10, 12 and 14, in addition to the major east-west primitive trail located south/southeast of the Specific Plan area (see Figure 6 for the proposed trail network and Figure 7 for those portions of the primitive trail within the surrounding open space that would be implemented as a project-level component). The remainder of the project-level perimeter trail would be implemented as future subdivision maps are proposed, corresponding with Phases 2a and 2b.

An existing utility trail would be maintained to provide a connection to the southern border wall road. From the utility trail, access would be provided to two primitive trails including one out and back trail segment west of the utility road and another east west primitive trail to the east (see Figure 6). The eastern primitive trail may ultimately provide connections to future primitive trails associated with the OMCP trail network; however, at this time specific alignments are not known.

Approximately 0.96 mile of primitive trails (4 feet wide) are proposed to be improved both within the Specific Plan and south of the Specific Plan boundary. Trail improvements would include trail stabilization, erosion control, and closure of unauthorized trail routes in proximity to proposed formal trail alignments. Primitive trails would be a natural soil/dirt surface and would be for passive recreation only.

In order to close unauthorized trails, restoration of disturbed land and non-native grassland areas within a 100-foot-wide trail corridor (50 feet on each side of the trail) is proposed. Habitat enhancement would be implemented in disturbed lands and non-native grasslands. At trailheads leading into the primitive trail network surrounding the open space, trash cans would be provided and signage would be installed to notify trail users to remain on designated trails. Within the primitive trail network, the trail would be a natural dirt surface. Where needed to protect sensitive resources such as aquatic resources or sensitive plant species, peeler pole fencing would be installed to ensure trail users do not disturb these features.

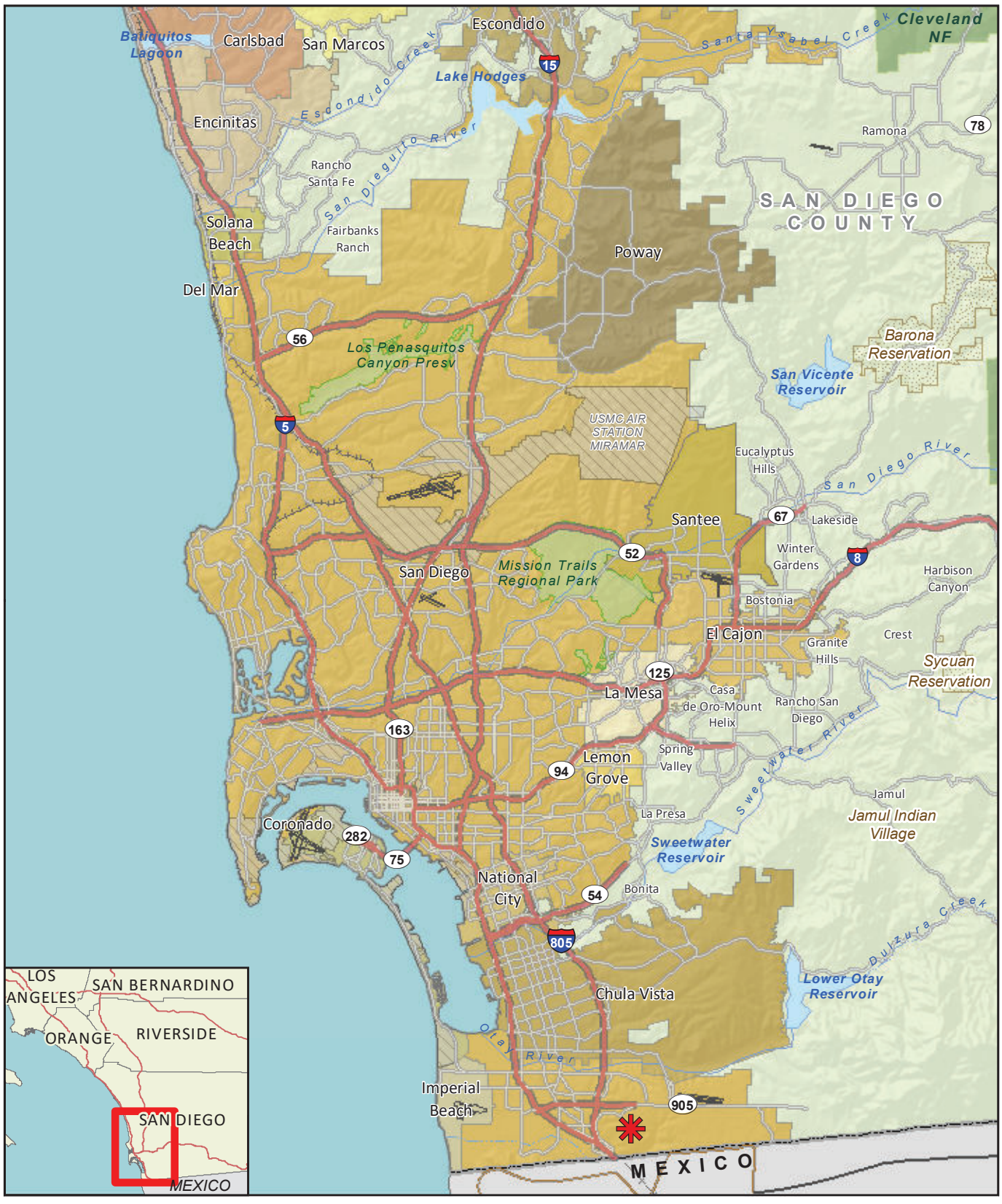
2.2.5 Landscaping and Restoration

A landscape plan has been prepared covering Planning Areas 8 through 14 in addition to the Beyer Boulevard extension. After manufactured slopes are created, landscaping would be installed. Manufactured slopes near or within open space areas would be revegetated with native species. A drainage outfall proposed to be installed in the open space southeast of the Specific Plan would also be subject to revegetation after pipe installation.

In addition to typical slope revegetation efforts, the project includes a number of habitat restoration efforts including restoration of disturbed lands within a 100-foot corridor of the primitive trail alignments and implementation of restoration activities to create Otay tarplant habitat within existing non-native grassland, creation of coastal cactus wren habitat within disturbed lands, creation of a vernal pool and Quino checkerspot butterfly habitat restoration area, in addition to wetland restoration located within Spring Canyon (southeast of the Specific Plan area). These restoration, habitat creation, and revegetation efforts are depicted on Figure 7 as habitat restoration areas and would include some limited grading and contouring activities, non-native species removal, salvage and translocation of sensitive species, and planting of native species to create native habitats. Habitat management and maintenance efforts would be implemented over a specified period to control non-natives and ensure success criteria for each of the restoration efforts.

2.2.6 Project Design Features

The project would not include natural gas appliances or heating associated with the project-level residential components. The requirement to have all electric appliances and heating would be included as a project condition of approval.



Project Location

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FIGURE 1
Regional Location

Image Source: NearMap (Flown January 2024)

RECON

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FIGURE 2
Project Location on Aerial Photograph

Map Source: Placeworks

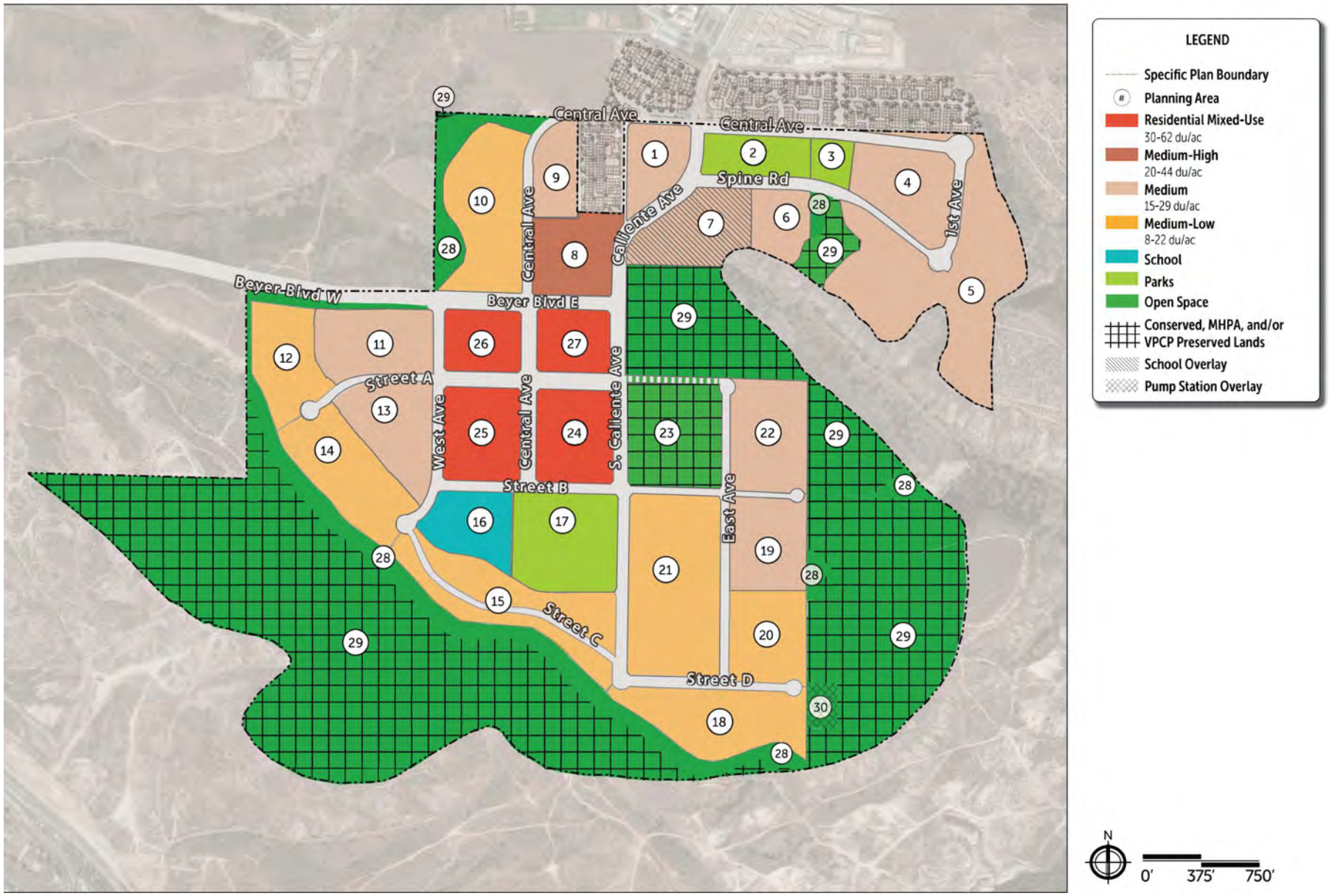

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FIGURE 3

Specific Plan Development Concept

Map Source: Placeworks

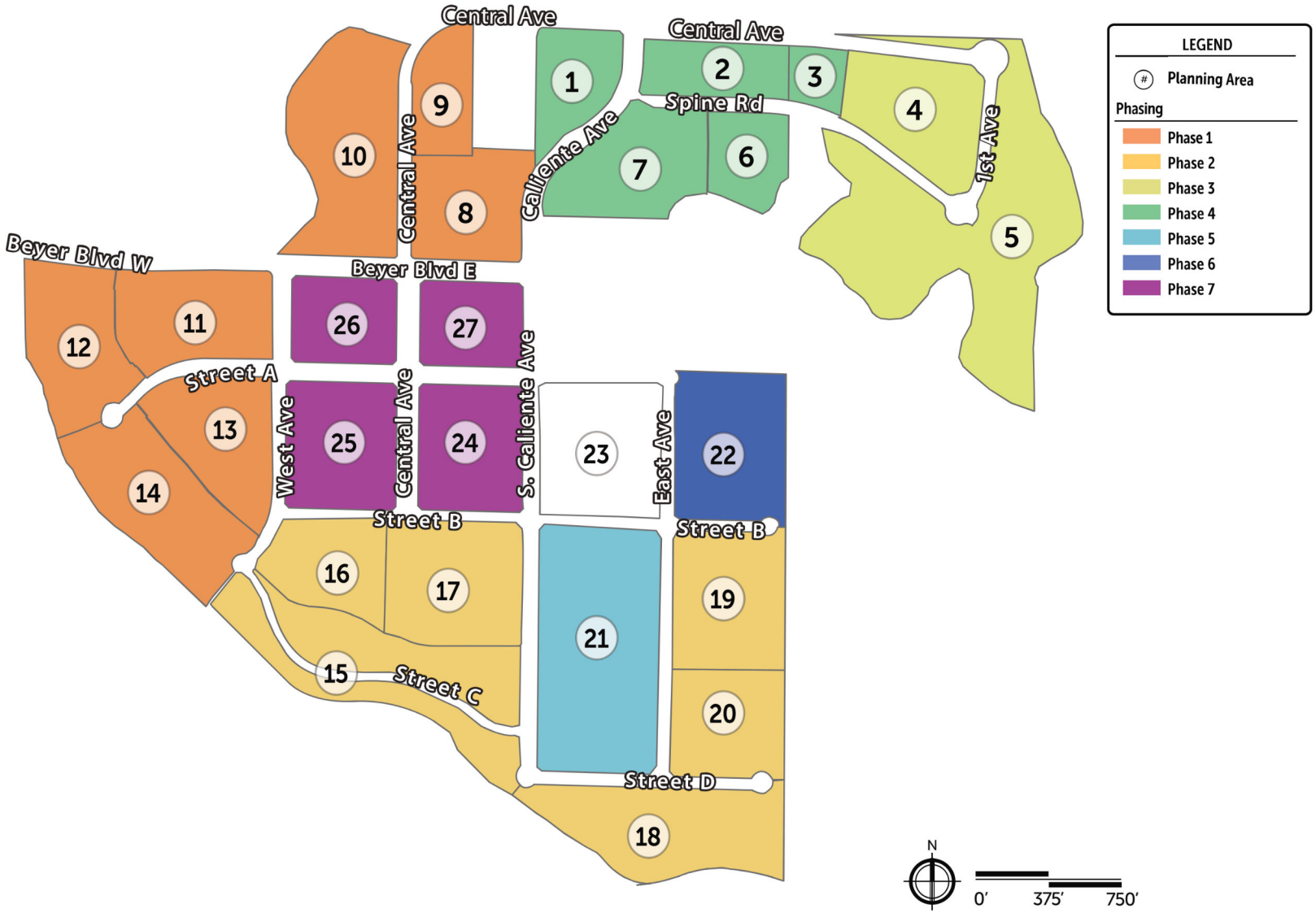

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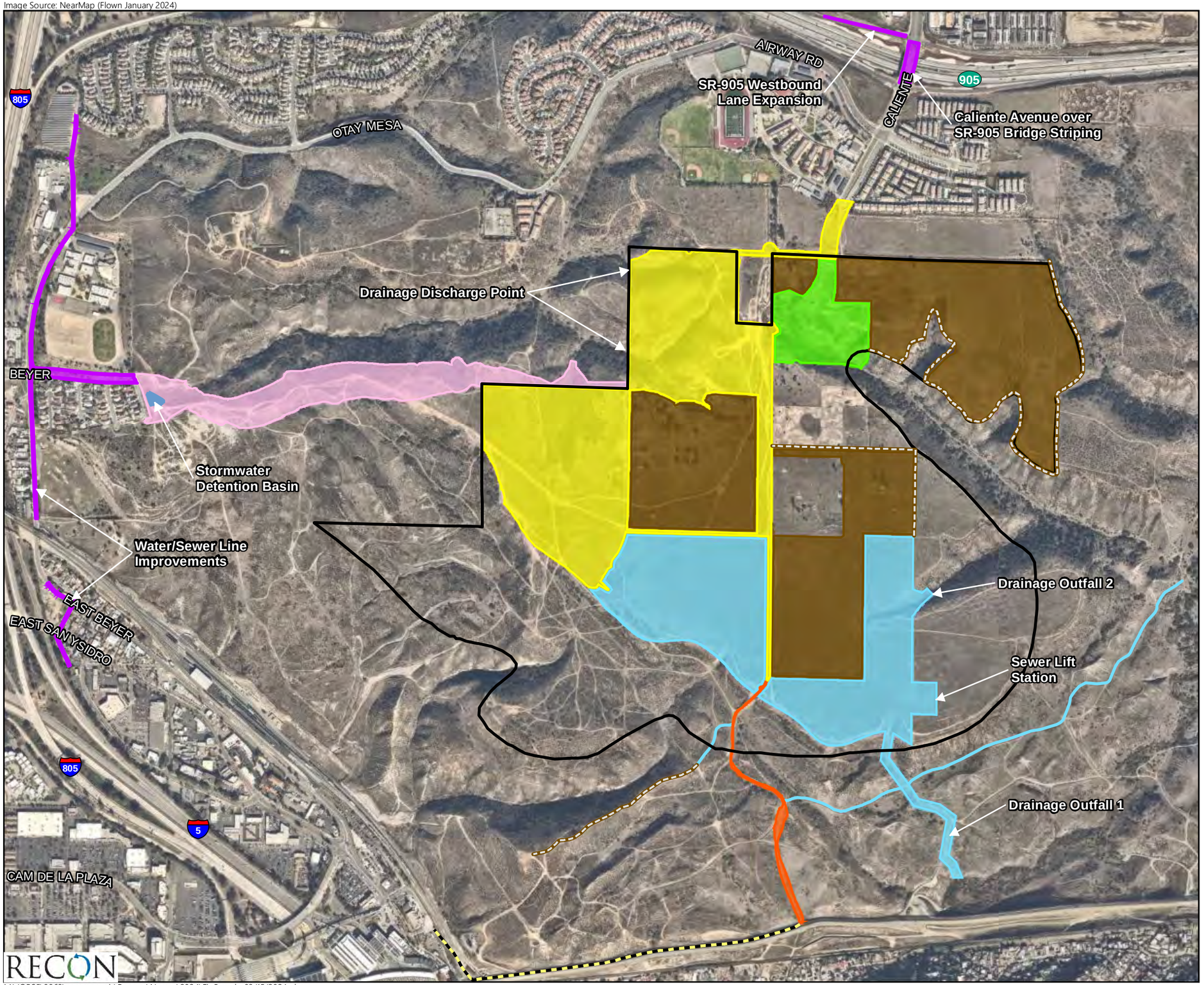
FIGURE 4

Specific Plan Development Phasing

Image Source: NearMap (Flown January 2024)



- Specific Plan Boundary
- Phase 1
- Phase 2
- Phase 4
- Beyer Boulevard
- Off-site Improvements
- Emergency Vehicle Access Road
- Emergency Vehicle Access Road - No Improvements Required (Existing Road)
- Program-level Analysis Phases 3-7
- Program-level Conceptual Trails*

* Program-level Conceptual trails require further evaluation and study to identify final alignments. The identification of conceptual trail alignments graphic does authorize public use of trails.

0 Feet 900

RECON

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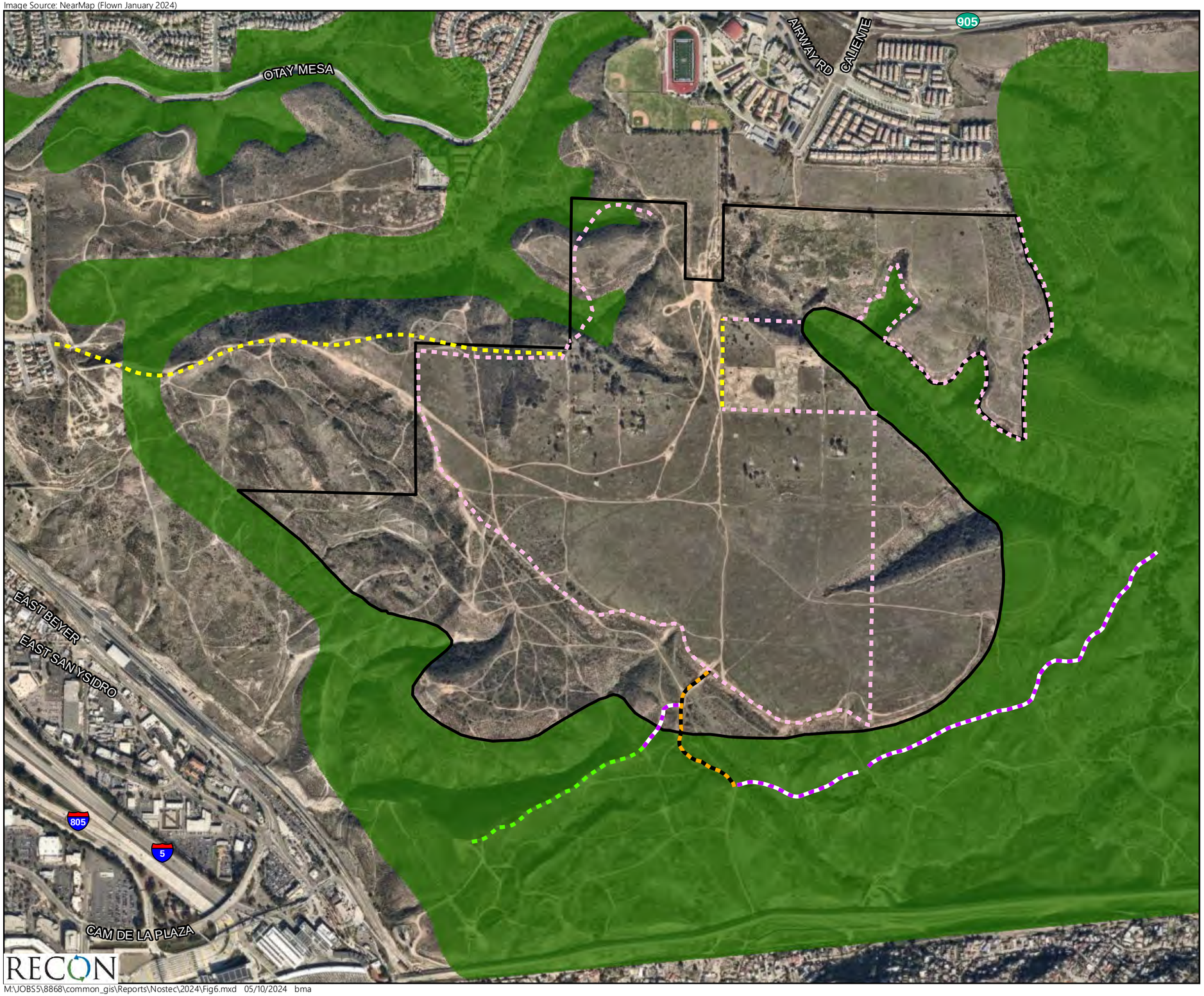
FIGURE 5
Grading Phasing

Image Source: NearMap (Flown January 2024)



Specific Plan Boundary

City of SD MHPA

Proposed Trails

Public Sidewalk

Perimeter Trail (Borders Development)

Trail Within Existing Disturbance

Program-level Trail (within Existing Disturbance)

Emergency Vehicle Access Road/
Connection to Primitive Trail Network

0 Feet 850

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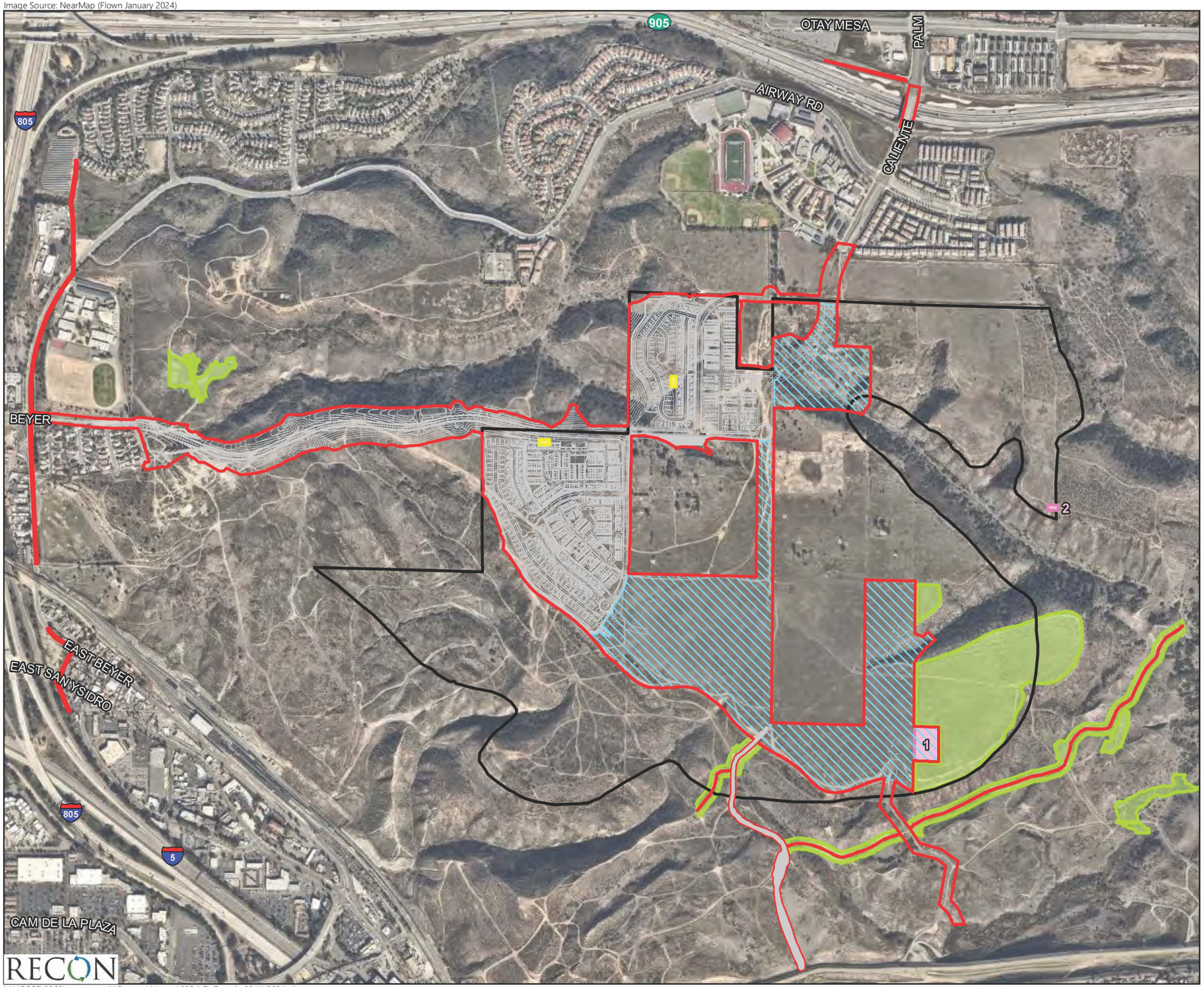
FIGURE 6
Trail Network

Image Source: NearMap (Flown January 2024)



- Project-level Analysis Grading Footprint
- Project-level Analysis - Construction and Operational
- Project-level Analysis - Rough Grading Only
- Permanent Sewer Lift Station
- Temporary Sewer Lift Station
- Specific Plan Boundary
- Habitat Restoration Areas

0 Feet 900

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FIGURE 7
Project-level Analysis Area

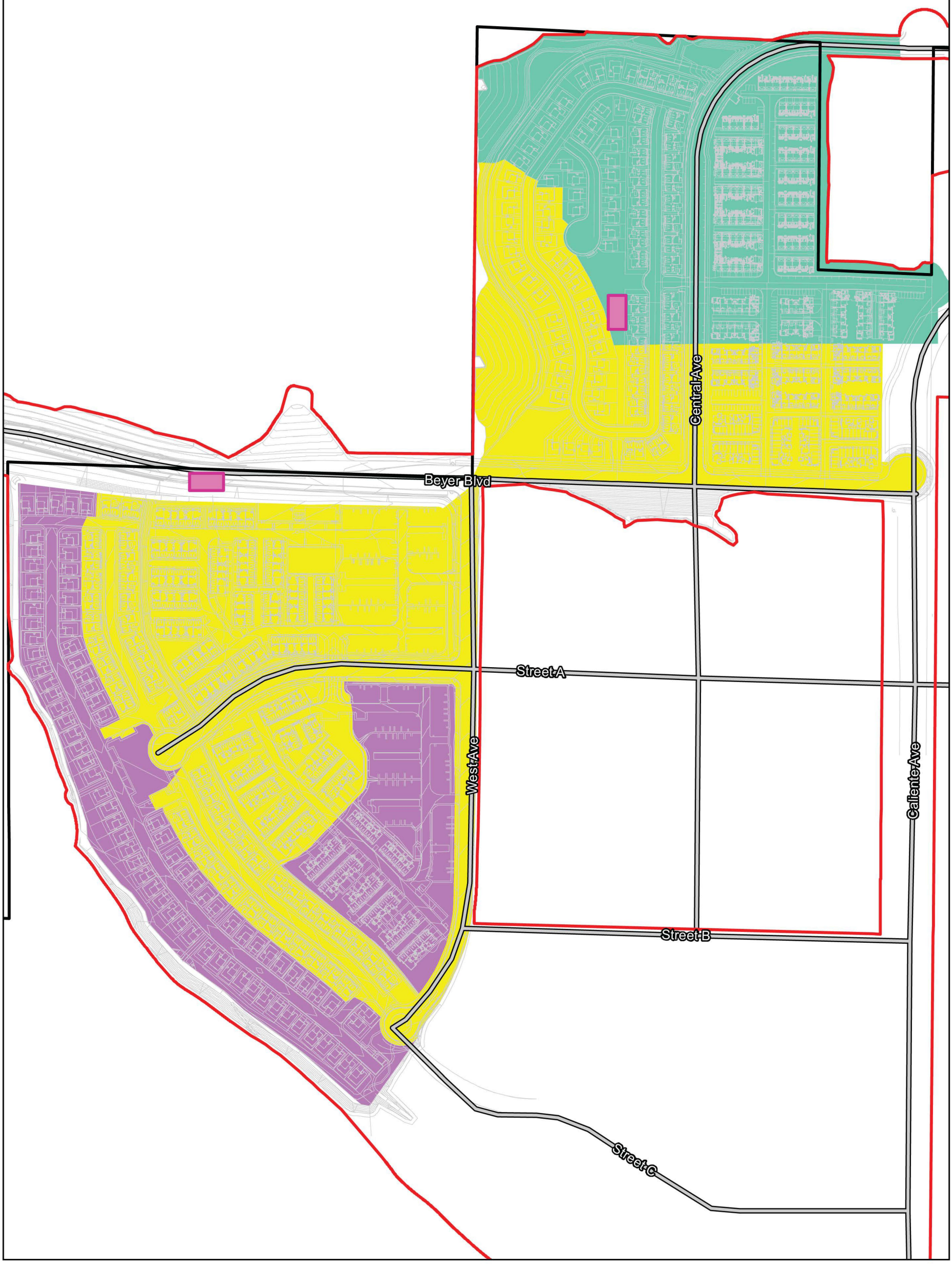

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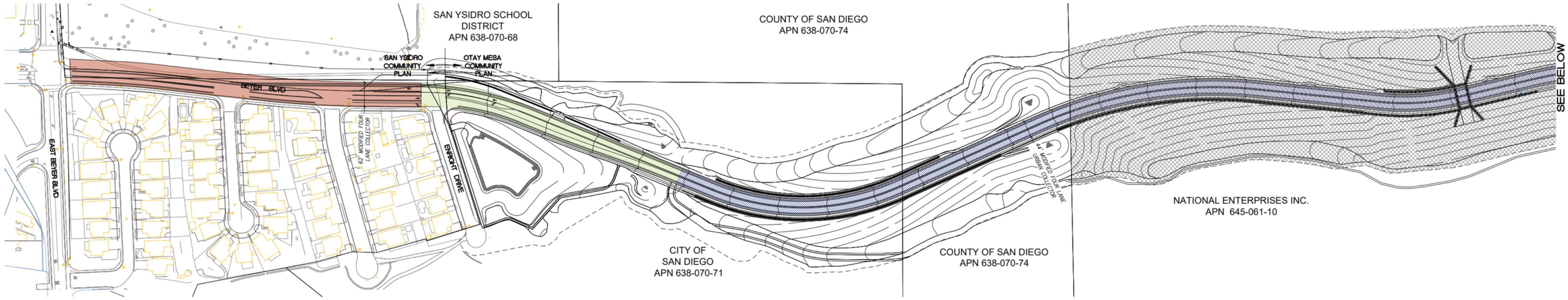
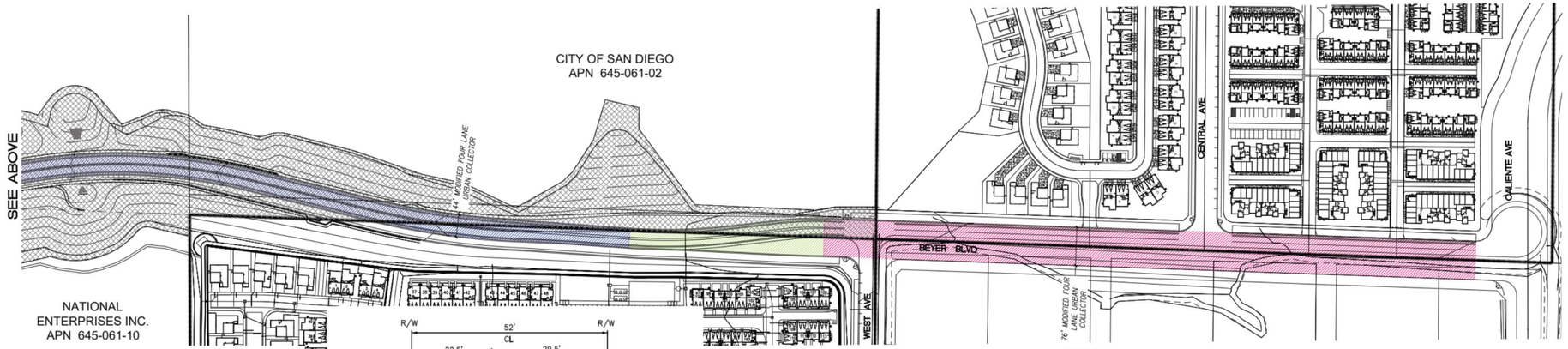
FIGURE 8
Phase 1

Map Source: Civil Sense, Inc.



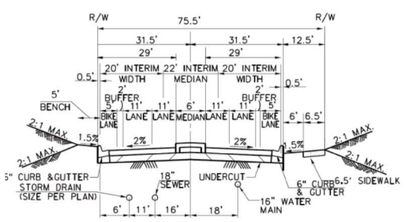


LEGEND

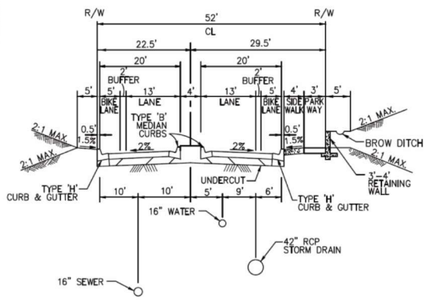
- FOUR LANE COLLECTOR WITHIN SAN YSIDRO COMMUNITY PLAN
- TRANSITION AREA TO FOUR LANES WHEN WARRANTED
- MODIFIED 4 LANE URBAN COLLECTOR CONSTRUCTED WITH TWO LANES DUE TO ENVIRONMENTALLY SENSITIVE HABITAT
- FOUR LANE URBAN MAJOR
- APPROXIMATE LIMITS OF CONSERVATION EASEMENT MODIFICATION

TOTAL LENGTH OF BEYER BLVD (FROM EAST BEYER BLVD TO CALIENTE AVE) = 6,800 FEET

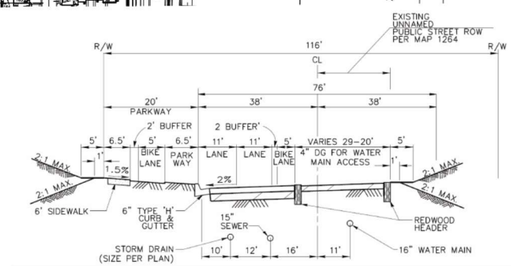
TOTAL LENGTH OF 2 LANE SECTION (FROM END OF TRANSITION EAST OF ENRIGHT DRIVE TO START OF TRANSITION WEST OF WEST AVE) = 3,500 FEET



MODIFIED 4 LANE URBAN COLLECTOR
CITY SUPPORTED MODIFIED BEYER BLVD SECTION
(FROM ENRIGHT DRIVE TO WEST AVE)
NOT TO SCALE



MODIFIED 4 LANE URBAN COLLECTOR
PROPOSED BEYER BLVD SECTION
(FROM ENRIGHT DRIVE TO WEST AVE)
NOT TO SCALE



4 LANE URBAN MAJOR
INTERIM BEYER BLVD EAST SECTION
(FROM WEST AVE TO CALIENTE AVE)
NOT TO SCALE

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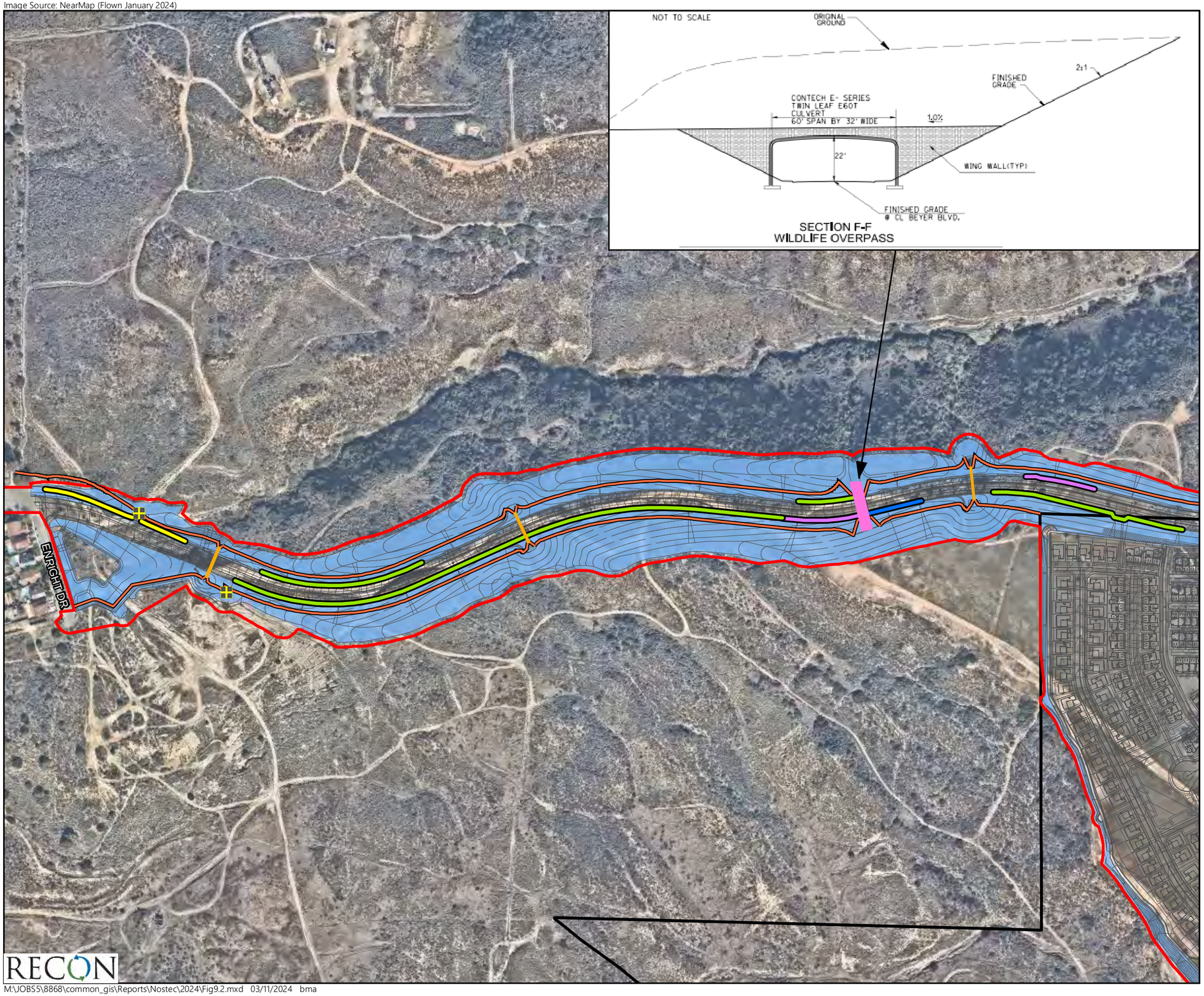
FIGURE 9.1
Beyer Boulevard

Image Source: NearMap (Flown January 2024)



Project-level Analysis Area

Specific Plan Boundary

4-foot Retaining Wall

6-foot Masonry Noise Wall

0 - 8-foot Retaining Wall

12-foot Retaining Wall

SDG&E Access Gate

Wildlife Fence

Critter Crossing Culvert (6' dia.)

Wildlife Overcrossing (32' wide by 60' long)

Site Plan

Manufactured Slopes to be Revegetated with Native Species

0 Feet 300

RECON

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FIGURE 9.2
Beyer Boulevard Wildlife Crossings, Wildlife Fencing, and Retaining Walls

Map Source: Leppert Engineering Corp.

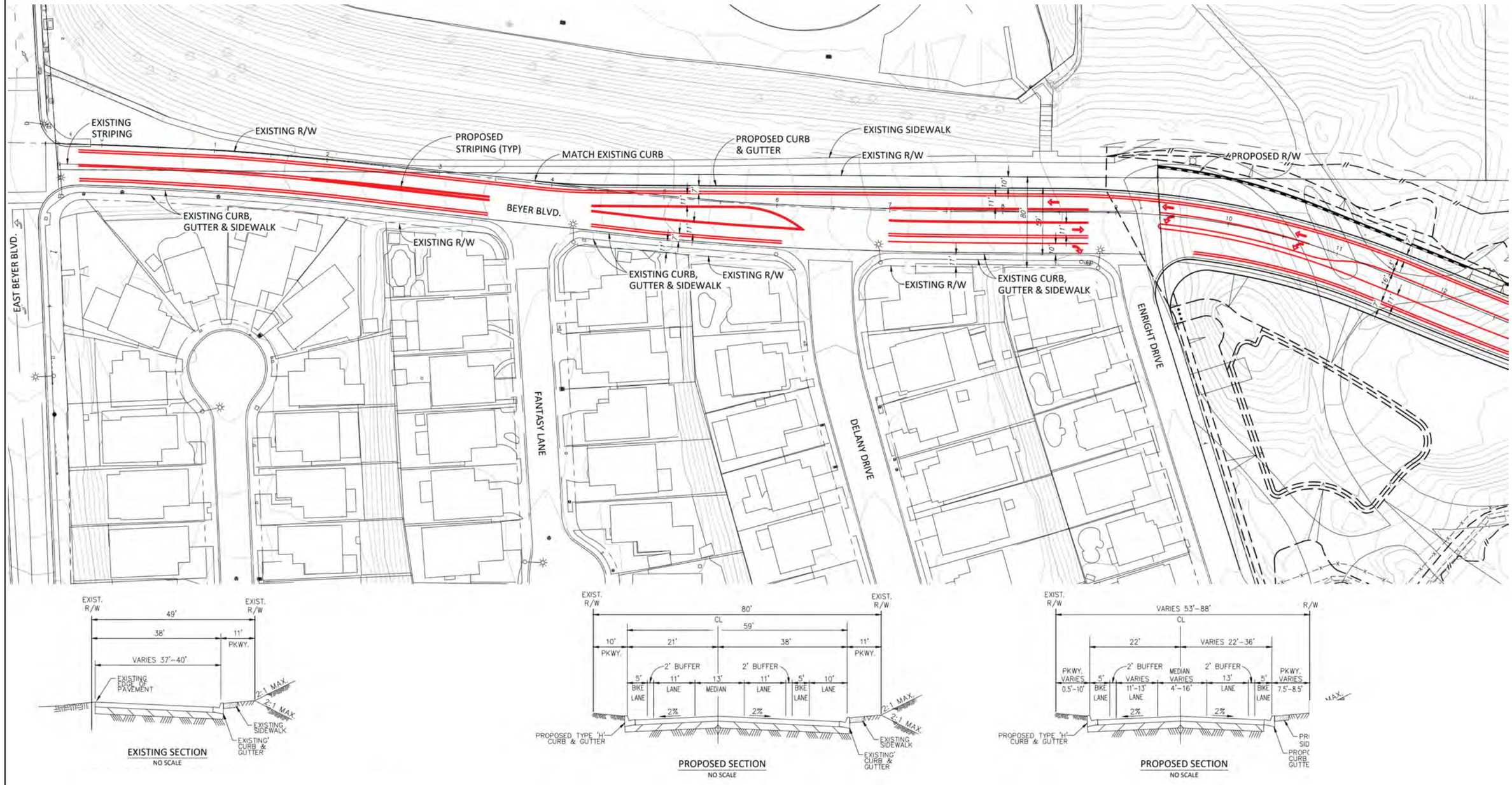

FIGURE 9.3
Beyer Boulevard between Enright Drive and East Beyer Boulevard - Interim Condition

RECON
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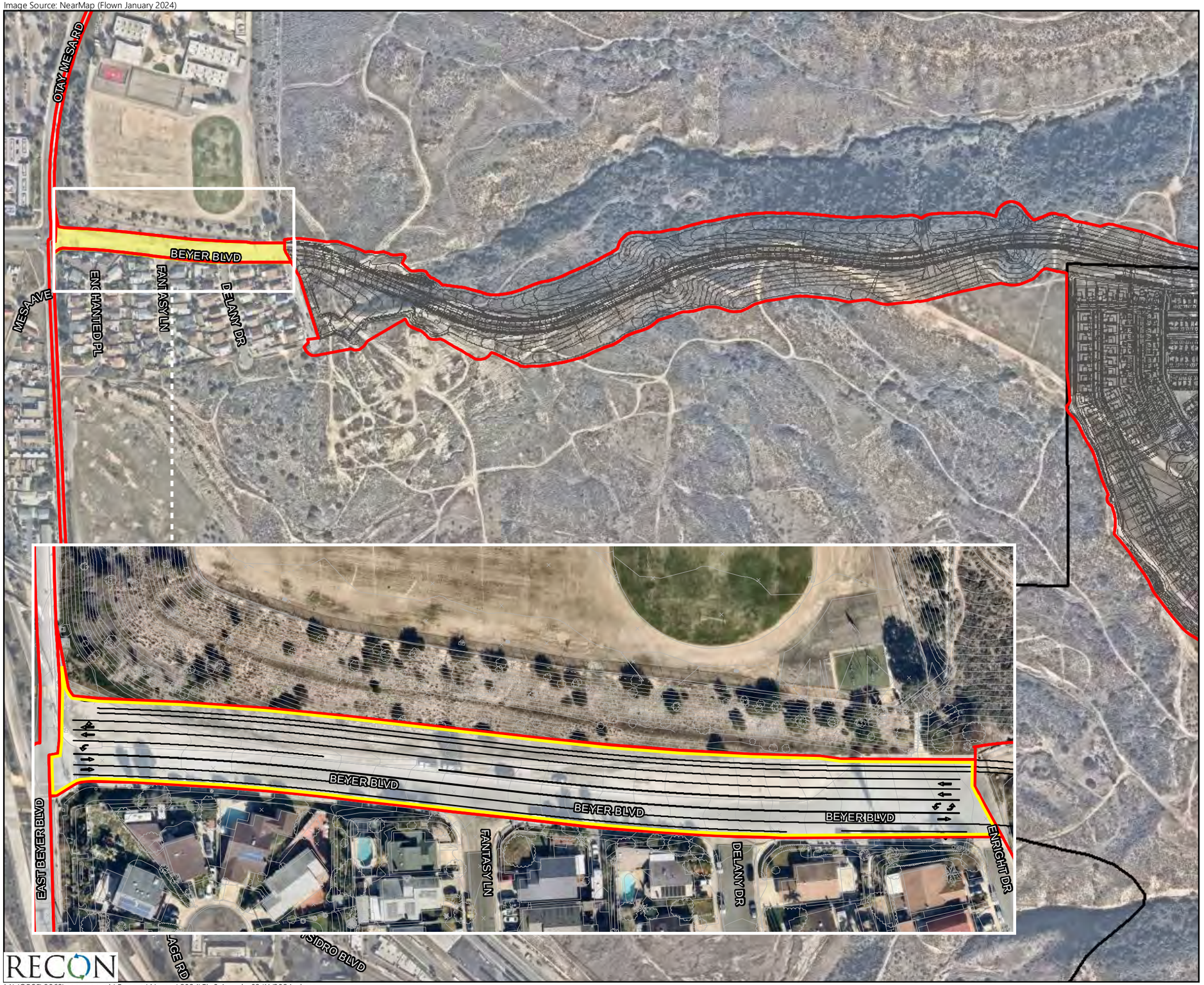
Image Source: NearMap (Flown January 2024)



Project-level Analysis Area
Beyer Boulevard Widening
Specific Plan Boundary
Site Plan

0 Feet 400

FIGURE 9.4
Beyer Boulevard Widening between Enright Drive and East Beyer Boulevard - Ultimate Condition

RECON

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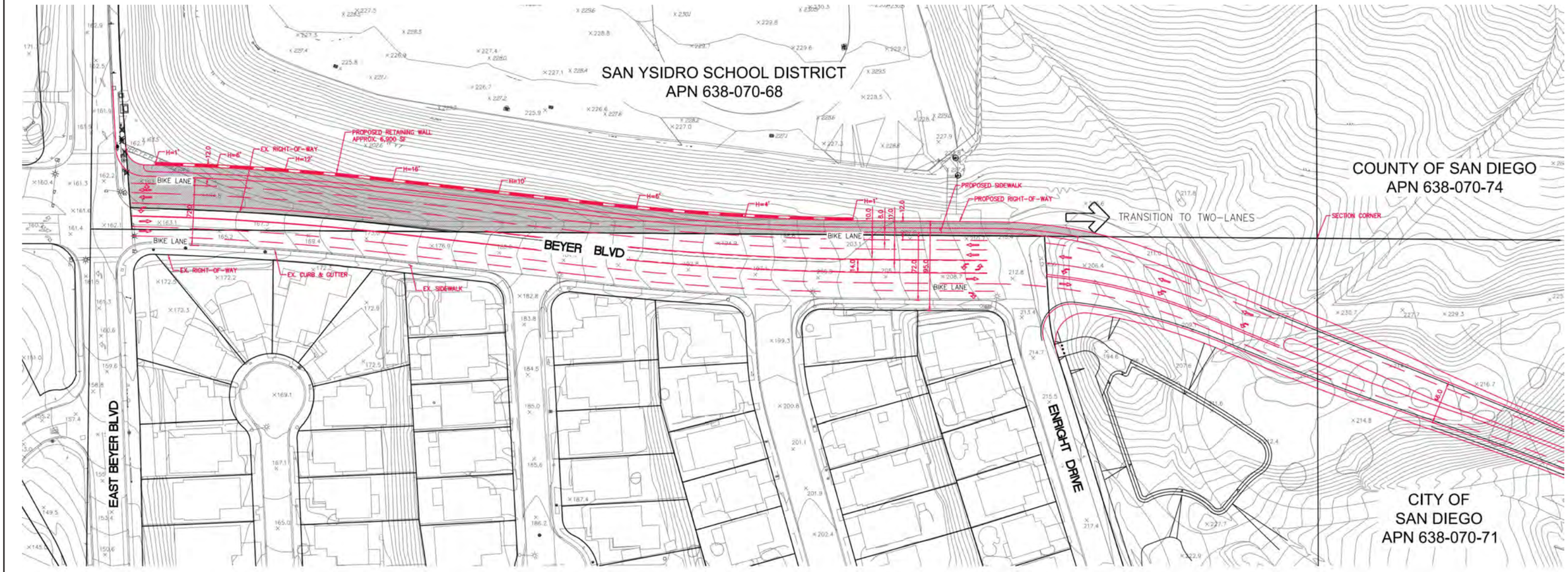
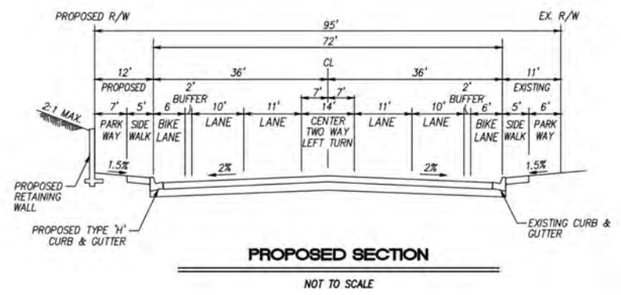
Map Source: Civil Sense





PROPOSED SECTION

NOT TO SCALE

FIGURE 9.5
Beyer Boulevard between Enright Drive and East Beyer Boulevard - Ultimate Four Lane Option

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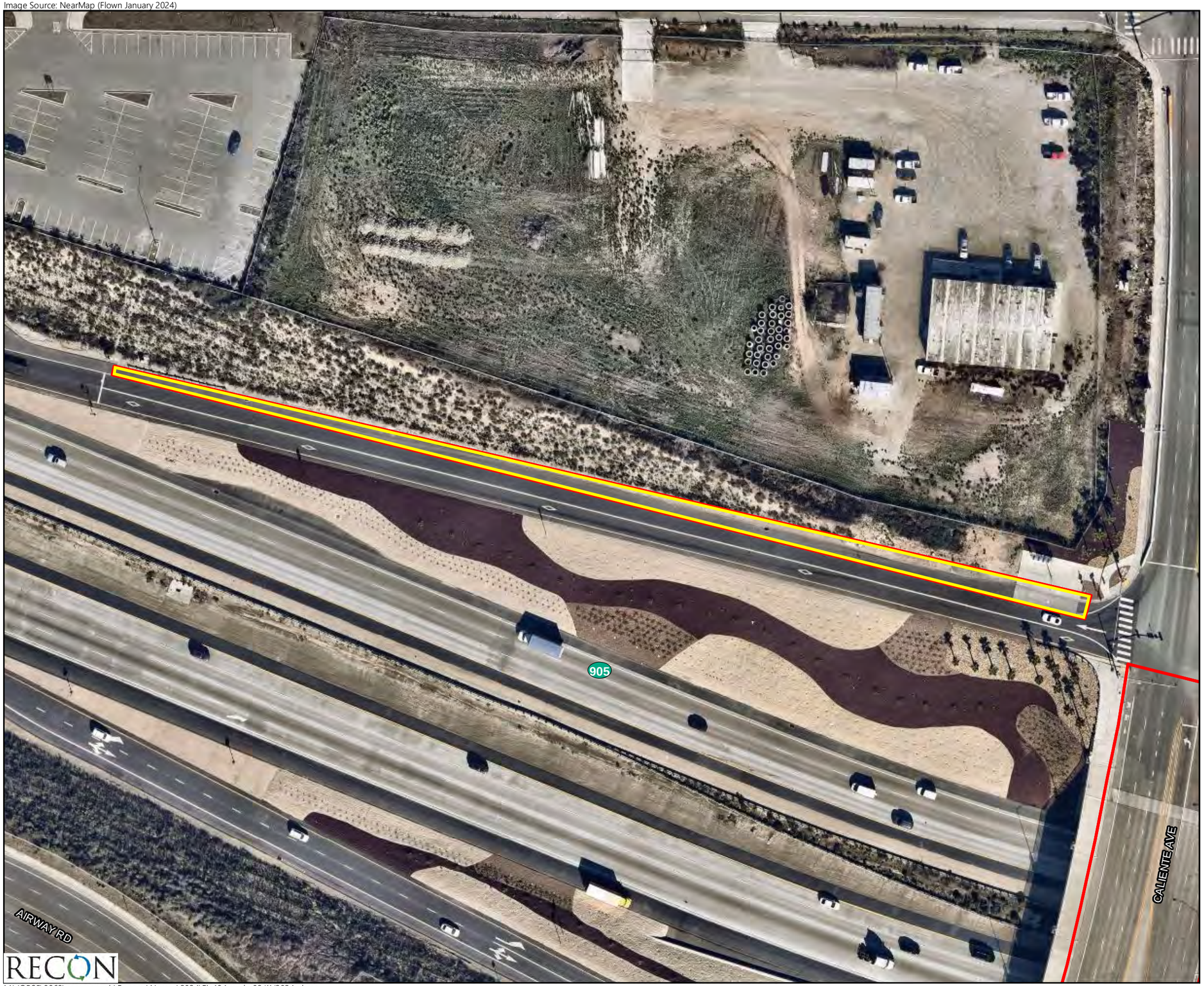
Image Source: NearMap (Flown January 2024)



Project-level Analysis Area
Road Widening
Specific Plan Boundary

0 Feet 75

RECON

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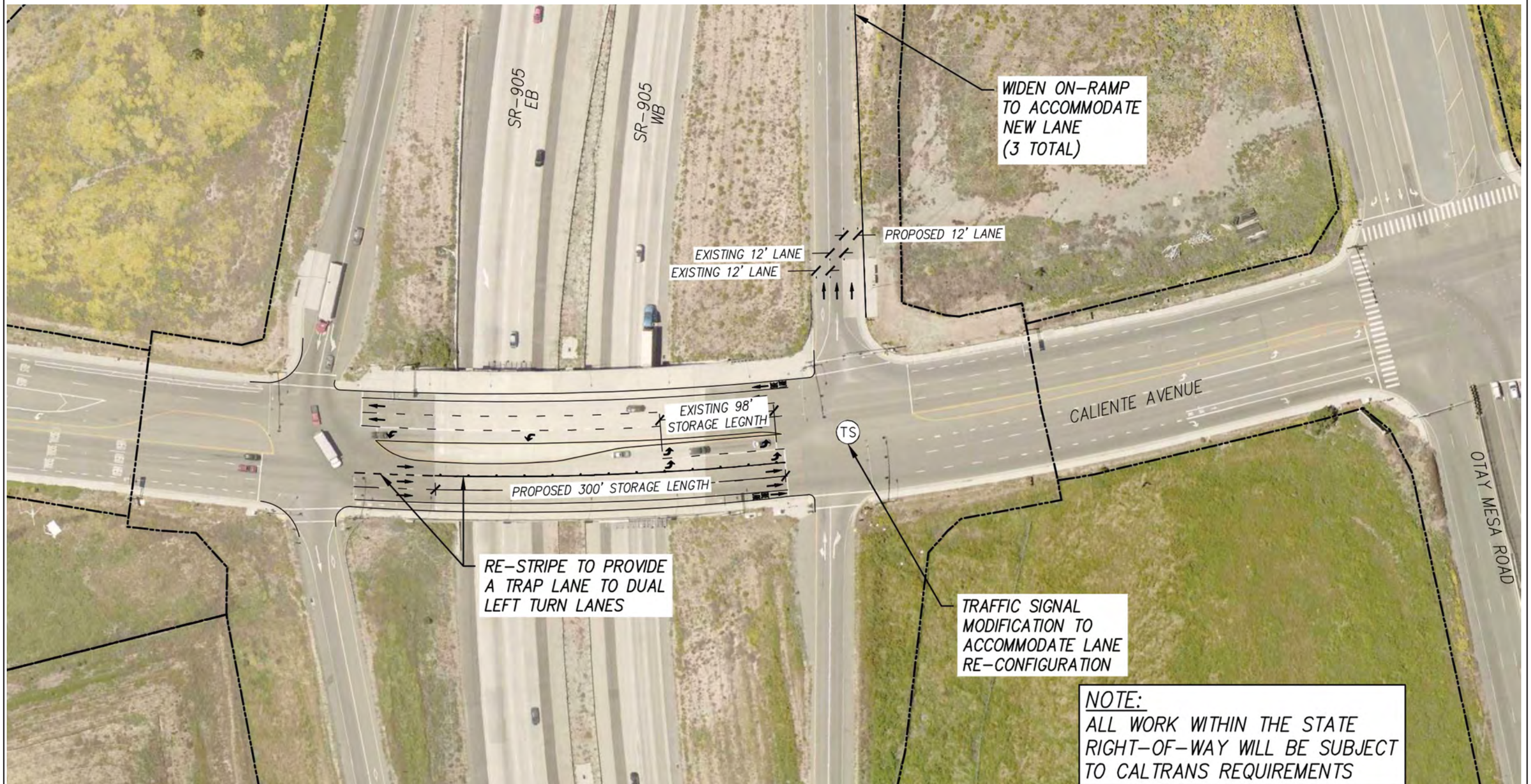
FIGURE 10.1
State Route 905 & Caliente Avenue
Westbound On-Ramp

Map Source: Civil Sense, Inc.



RECON

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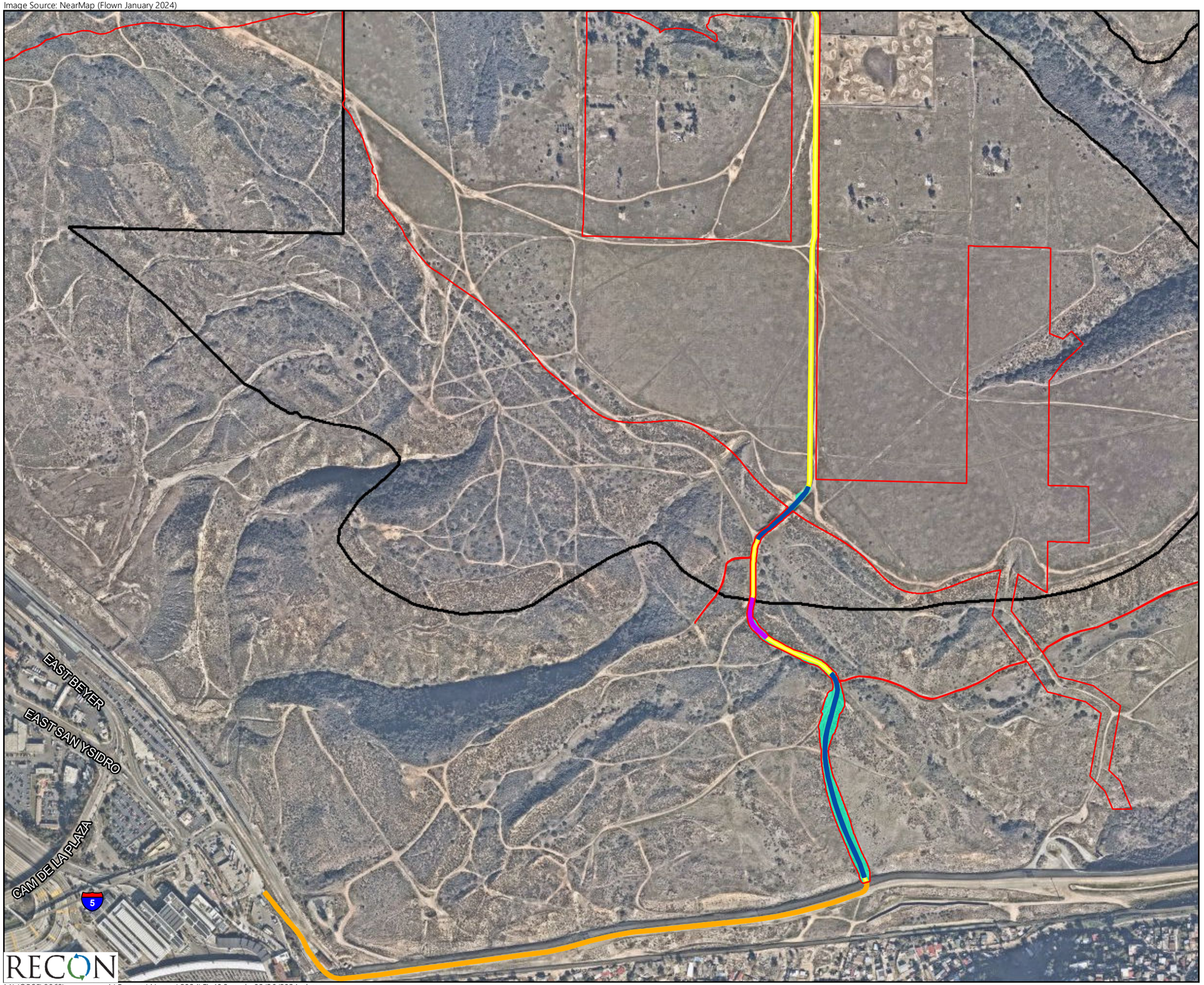
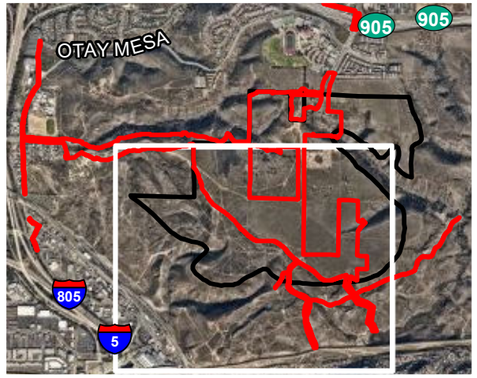
FIGURE 10.2
Caliente Avenue SR-905 Bridge Restriping and Signal Improvements

Image Source: NearMap (Flown January 2024)





Project-level Analysis Area

Specific Plan Boundary

20-foot Wide Emergency Vehicle Access (EVA)*

Asphalt Paving Required

Concrete Paving Required (15% Grade)

Decomposed Granite/Gravel Surfacing

Existing Access Road

Grading

*Narrows to 14 feet to avoid grading into sensitive resources

Note: The ultimate location of the emergency access route on the top of the mesa is conceptual and may shift within the project-level grading footprint based on need.

0 Feet 550

RECON

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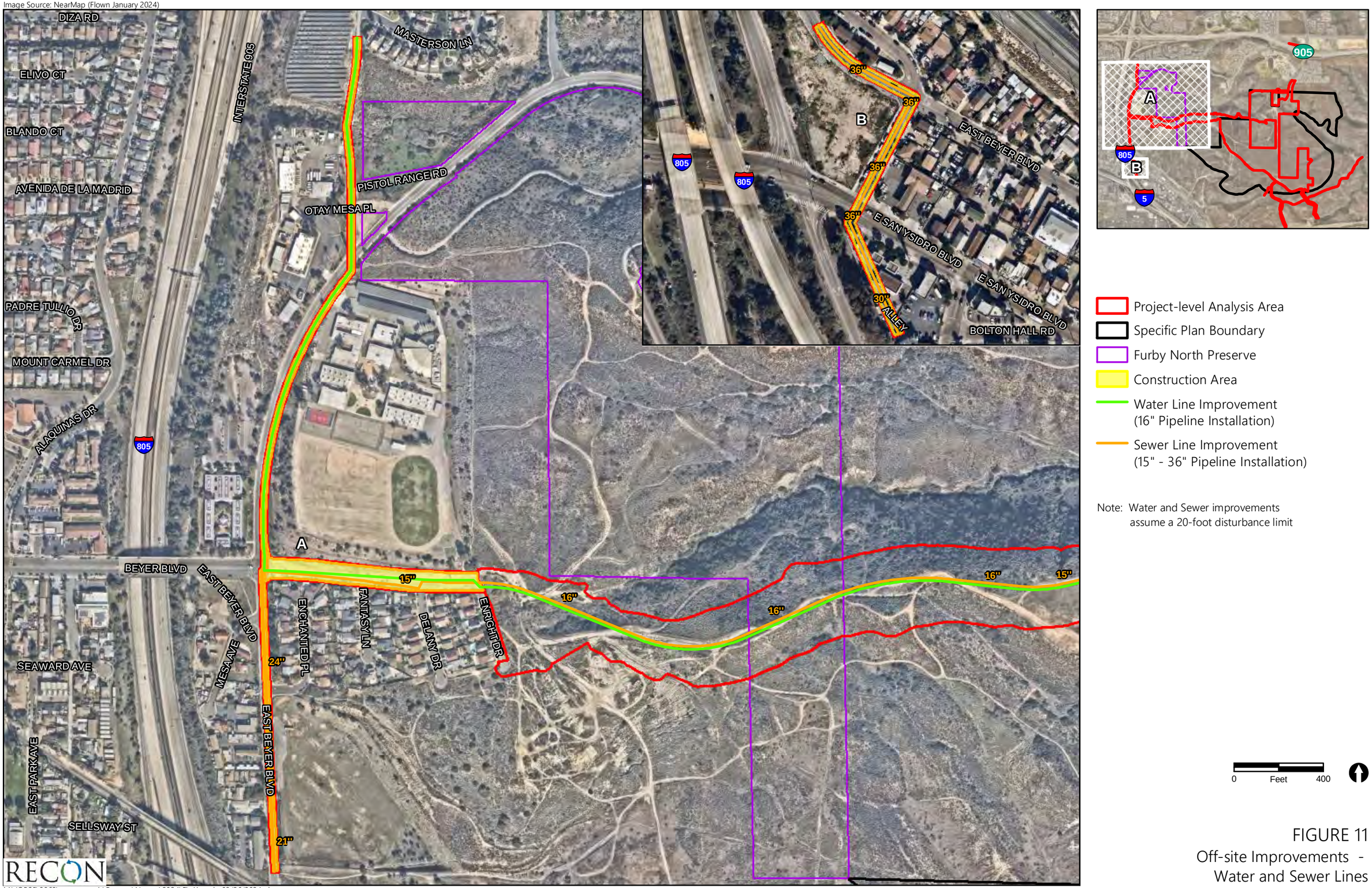
FIGURE 10.3
Emergency Vehicle Access Road

Image Source: NearMap (Flown January 2024)



- Project-level Analysis Area
- Specific Plan Boundary
- Furby North Preserve
- Construction Area
- Water Line Improvement (16" Pipeline Installation)
- Sewer Line Improvement (15" - 36" Pipeline Installation)

Note: Water and Sewer improvements assume a 20-foot disturbance limit

0 Feet 400

FIGURE 11
Off-site Improvements - Water and Sewer Lines

RECON

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3.0 Existing Conditions

The project site is currently undeveloped and is not a significant source of GHG emissions.

3.1 Environmental Setting

3.1.1 State GHG Inventory

The California Air Resources Board (CARB) performs statewide GHG inventories. The inventory is divided into nine broad sectors of economic activity: agriculture, commercial, electricity generation, forestry, high GWP emitters, industrial, recycling and waste, residential, and transportation. Emissions are quantified in million metric tons of CO_2 equivalent (MMT CO_2E). Table 2 shows the estimated statewide GHG emissions for the years 1990, 2010, and 2020. These years are highlighted in Table 2 because 1990 is the baseline year for established reduction targets, 2010 corresponds to the same years for which inventory data for the City is available, and 2019 is the most recent data available.

Table 2
California GHG Emissions By Sector in 1990, 2010, and 2015[1]

Sector	1990 Emissions in MMT CO_2E (% total)[2]	2010 Emissions in MMT CO_2E (% total)[3]	2019 Emissions in MMT CO_2E (% total)[3]
Electricity Generation	110.5 (25.7%)	90.5 (20.2%)	59.0 (14.1%)
Transportation	150.6 (35.0%)	170.2 (38.0%)	170.3 (40.7%)
Industrial	105.3 (24.4%)	101.3 (22.6%)	99.9 (23.9%)
Commercial	14.4 (3.4%)	20.1 (4.5%)	24.2 (5.8%)
Residential	29.7 (6.9%)	32.1 (7.2%)	33.0 (7.9%)
Agriculture & Forestry	18.9 (4.4%)	33.7 (7.5%)	31.8 (7.6%)
Not Specified	1.3 (0.3%)	--	--
TOTAL[4]	**430.7**	**447.9**	**418.2**

SOURCE: CARB 2007 and 2021.
[1]1990 data was obtained from the CARB 2007 source and are based on IPCC fourth assessment report GWPs.
[2]Percentages may not total 100 due to rounding.
[3]2010 and 2019 data was retrieved from the CARB 2021 source.
[4]Totals may vary due to independent rounding.

As shown in Table 2, statewide GHG source emissions totaled approximately 431 MMT CO_2E in 1990, 448 MMT CO_2E in 2010, and 418 MMT CO_2E in 2019. Many factors affect year-to-year changes in GHG emissions, including economic activity, demographic influences, environmental conditions such as drought, and the impact of regulatory efforts to control GHG emissions. As shown, transportation-related emissions consistently contribute to the most GHG emissions.

3.1.2 Regional GHG Inventory

A San Diego emissions inventory was prepared for total community-wide GHG emissions with adoption of the City's 2022 CAP. Table 3 summarizes the sources and quantities of 2019 community emissions. The largest source of emissions is on-road transportation, followed by electricity, natural gas, solid waste, off-road transportation, water, and wastewater.

Table 3
City of San Diego GHG Emissions in 2019

Sector	2019 GHG Emissions (MT CO_2E)	Distribution (%)
On-Road Transportation[1]	5,805,000	55%
Electricity	2,375,000	23%
Natural Gas	1,911,000	18%
Solid Waste	277,000	3%
Off-Road Transportation	70,000	1%
Water	68,000	1%
Wastewater	26,000	0.20%
TOTAL	10,532,000	100%

SOURCE: City of San Diego 2022b.
Sums may not add up to totals due to rounding.
[1]2019 vehicle miles traveled (VMT) are based on 2016 VMT adjusted to account for regional VMT growth, as reflected in the California Highway Performance Monitoring System from 2017 to 2019. 2016 VMT is from SANDAG's Series 14 base year in the draft 2021 Regional Plan and activity-based model (ABM2+).

3.2 Regulatory Background

In response to rising concern associated with increasing GHG emissions and global climate change impacts, several plans and regulations have been adopted at the international, national, and state levels with the aim of reducing GHG emissions. The following is a discussion of the federal, state, and local plans and regulations most applicable to the project.

3.2.1 Federal

The federal government, U.S. EPA, and other federal agencies have many federal-level programs and projects to reduce GHG emissions. In June 2012, the Council on Environmental Quality (CEQ) revised the Federal Greenhouse Gas Accounting and Reporting Guidance originally issued in October 2010. The CEQ guidance identifies ways in which Federal agencies can improve consideration of GHG emissions and climate change for Federal actions. The guidance states that National Environmental Policy Act documents should provide decision makers with relevant and timely information and should consider (1) GHG emissions of a Proposed Action and alternative actions, and (2) the relationship of climate change effects to a Proposed Action or alternatives. Specifically, if a Proposed Action would be reasonably anticipated to cause direct emissions of 25,000 MT CO_2E GHG emissions on an annual basis, agencies should consider this as an indicator that a quantitative assessment may be meaningful to decision makers and the public (CEQ 2012).

3.2.1.1 Environmental Protection Agency

The U.S. EPA has many federal-level programs and projects to reduce GHG emissions. The U.S. EPA provides technical expertise and encourages voluntary reductions from the private sector. One of the voluntary programs applicable to the proposed project is the Energy Star program.

Energy Star is a joint program of U.S. EPA and the U.S. Department of Energy, which promotes energy efficient products and practices. Tools and initiatives include the Energy Star Portfolio Manager, which helps track and assess energy and water consumption across an entire portfolio of buildings, and the Energy Star Most Efficient 2020, which provides information on exceptional products which represent the leading edge in energy efficient products in the year 2020 (U.S. EPA 2020a).

The U.S. EPA also collaborates with the public sector, including states, tribes, localities and resource managers, to encourage smart growth, sustainability preparation, and renewable energy and climate change preparation. These initiatives include the Clean Energy – Environment State Partnership Program, the Climate Ready Water Utilities Initiative, the Climate Ready Estuaries Program, and the Sustainable Communities Partnership (U.S. EPA 2020b).

3.2.1.2 Corporate Average Fuel Economy Standards

The federal Corporate Average Fuel Economy (CAFE) standards determine the fuel efficiency of certain vehicle classes in the U.S. The first phase of the program applied to passenger cars, new light-duty trucks, and medium-duty passenger cars with model years 2012 through 2016, and required these vehicles to achieve a standard equivalent to 35.5 miles per gallon (mpg). The second phase of the program applies to model years 2017 through 2025 and increased the standards to 54.5 mpg. Separate standards were also established for medium- and heavy-duty vehicles. The first phase applied to model years 2014 through 2018 and the second phase applies to model years 2018 through 2027. With improved gas mileage, fewer gallons of transportation fuel would be combusted to travel the same distance, thereby reducing nationwide GHG emissions associated with vehicle travel.

3.2.2 State

The State of California has adopted a number of plans and regulations aimed at identifying statewide and regional GHG emissions caps, GHG emissions reduction targets, and actions and timelines to achieve the target GHG reductions.

3.2.2.1 Executive Orders and Statewide GHG Emission Targets

Executive Order S-3-05

This Executive Order (EO) established the following GHG emission reduction targets for the State of California:

- by 2010, reduce GHG emissions to 2000 levels;
- by 2020, reduce GHG emissions to 1990 levels; and
- by 2050, reduce GHG emissions to 80 percent below 1990 levels.

This EO also directs the secretary of the California Environmental Protection Agency to oversee the efforts made to reach these targets, and to prepare biannual reports on the progress made toward meeting the targets and on the impacts to California related to global warming, including impacts to water supply, public health, agriculture, the coastline, and forestry. With regard to impacts, the report shall also prepare and report on mitigation and adaptation plans to combat the impacts. The first Climate Action Team Assessment Report was produced in March 2006, and has been updated every two years.

Executive Order B-30-15

This EO, issued on April 29, 2015, establishes an interim GHG emission reduction goal for the state of California by 2030 of 40 percent below 1990 levels. This EO also directed all state agencies with jurisdiction over GHG emitting sources to implement measures designed to achieve the new interim 2030 goal, as well as the pre-existing, long-term 2050 goal identified in EO S-3-05. Additionally, this EO directed CARB to update its Climate Change Scoping Plan to address the 2030 goal.

3.2.2.2 California Global Warming Solutions Act

In response to EO S-3-05, the California Legislature passed Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006, and thereby enacted Sections 38500–38599 of the California Health and Safety Code. The heart of AB 32 is its requirement that CARB establish an emissions cap and adopt rules and regulations that would reduce GHG emissions to 1990 levels by 2020. AB 32 also required CARB to adopt a plan by January 1, 2009 indicating how emission reductions would be achieved from significant GHG sources via regulations, market mechanisms, and other actions.

In 2008, CARB estimated that annual statewide GHG emissions were 427 MMT CO_2E in 1990 and would reach 596 MMT CO_2E by 2020 under a business as usual (BAU) condition (CARB 2008). To achieve the mandate of AB 32, CARB determined that a 169 MMTCO_2E (or approximate 28.5 percent) reduction in BAU emissions was needed by 2020. In 2010, CARB prepared an updated 2020 forecast to account for the recession and slower forecasted growth. CARB determined that the economic downturn reduced the 2020 BAU by 55 MMT CO_2E; as a result, achieving the 1990 emissions level by 2020 would require a reduction in GHG emissions of 21.7 (not 28.5) percent from the 2020 BAU. California has been on track to achieve 1990 levels, and based on the GHG inventories shown in Table 2, achieved the goal by 2017.

Approved in September 2016, Senate Bill (SB) 32 updates the California Global Warming Solutions Act of 2006 and enacts EO B-30-15. Under SB 32, the state would reduce its GHG emissions to 40 percent below 1990 levels by 2030. In implementing the 40 percent reduction goal, CARB is required to prioritize emissions reductions to consider the social costs of the emissions of GHGs; where "social costs" is defined as "an estimate of the economic damages, including, but not limited to, changes in net agricultural productivity; impacts to public health; climate adaptation impacts, such as property damages from increased flood risk; and changes in energy system costs, per metric ton of greenhouse gas emission per year."

3.2.2.3 Climate Change Scoping Plan

As directed by the California Global Warming Solutions Act of 2006, in 2008, CARB adopted the Climate Change Scoping Plan: A Framework for Change (Scoping Plan), which identifies the main strategies California will implement to achieve the GHG reductions necessary to reduce forecasted BAU emissions in 2020 to the state's historic 1990 emissions level (CARB 2008). In November 2017, CARB released the 2017 Climate Change Scoping Plan Update, the Strategy for Achieving California's 2030 Greenhouse Gas Target (2017 Scoping Plan; CARB 2017). The 2017 Scoping Plan identifies state strategies for achieving the state's 2030 interim GHG emissions reduction target codified by SB 32. Measures under the 2017 Scoping Plan Scenario build on existing programs such as the Low Carbon Fuel Standard, Advanced Clean Cars Program, Renewables Portfolio Standard (RPS), Sustainable Communities Strategy, Short-Lived Climate Pollutant Reduction Strategy, and the Cap-and-Trade Program. Additionally the 2017 Scoping Plan proposes new policies to address GHG emissions from natural and working lands.

3.2.2.4 Regional Emissions Targets – Senate Bill 375

SB 375, the 2008 Sustainable Communities and Climate Protection Act, was signed into law in September 2008 and requires CARB to set regional targets for reducing passenger vehicle GHG emissions in accordance with the Scoping Plan. The purpose of SB 375 is to align regional transportation planning efforts, regional GHG reduction targets, and fair-share housing allocations under state housing law. SB 375 requires Metropolitan Planning Organizations (MPOs) to adopt a Sustainable Communities Strategy or Alternative Planning Strategy to address GHG reduction targets from cars and light-duty trucks in the context of that MPO's Regional Transportation Plan. San Diego Association of Governments (SANDAG) is the San Diego region's MPO. The CARB targets for the SANDAG region require a 15 percent reduction in GHG emissions per capita from automobiles and light duty trucks compared to 2005 levels by 2020, and a 19 percent reduction by 2035.

3.2.2.5 Renewables Portfolio Standard

The RPS promotes diversification of the state's electricity supply and decreased reliance on fossil fuel energy sources. Renewable energy includes (but is not limited to) wind, solar, geothermal, small hydroelectric, biomass, anaerobic digestion, and landfill gas. Originally adopted in 2002 with a goal to achieve a 20 percent renewable energy mix by 2020 (referred to as the "Initial RPS"), the goal has been accelerated and increased by EOs S-14-08 and S-21-09 to a goal of 33 percent by 2020. In April 2011, SB 2 (1X) codified California's 33 percent RPS goal. In September 2015, the California Legislature passed SB 350, which increases California's renewable energy mix goal to 50 percent by year 2030. SB 100 (2018) further increased the standard set by SB 350 establishing the RPS goal of 44 percent by the end of 2024, 52 percent by the end of 2027, and 60 percent by 2030.

3.2.2.6 Assembly Bill 341 – Solid Waste Diversion

The Commercial Recycling Requirements mandate that businesses (including public entities) that generate 4 cubic yards or more of commercial solid waste per week and multi-family residential with five units or more arrange for recycling services. Businesses can take one or any combination of the following in order to reuse, recycle, compost, or otherwise divert solid waste from disposal.

Additionally, AB 341 mandates that 75 percent of the solid waste generated be reduced, recycled, or composted by 2020.

3.2.2.7 California Code of Regulations, Title 24 – California Building Code

The California Code of Regulations, Title 24, is referred to as the California Building Code, or CBC. It consists of a compilation of several distinct standards and codes related to building construction, including plumbing, electrical, interior acoustics, energy efficiency, handicap accessibility, and so on. Of particular relevance to GHG reductions are the CBC's energy efficiency and green building standards as outlined below.

Title 24, Part 6 – Energy Efficiency Standards

The California Code of Regulations, Title 24, Part 6 is the California Energy Efficiency Standards for Residential and Nonresidential Buildings (also known as the California Energy Code). This code, originally enacted in 1978, establishes energy efficiency standards for residential and non-residential buildings in order to reduce California's energy consumption. The Energy Code is updated periodically to incorporate and consider new energy-efficient technologies and methodologies as they become available, and incentives in the form of rebates and tax breaks are provided on a sliding scale for buildings achieving energy efficiency above the minimum standards.

The current version of the Energy Code, known as 2022 Title 24, or the 2022 Energy Code, became effective January 1, 2023. The Energy Code provides mandatory energy-efficiency measures as well as voluntary tiers for increased energy efficiency. The 2022 standards increase on-site renewable energy generation from solar, increase electric load flexibility to support grid reliability, reduce emissions from newly constructed buildings, reduce air pollution for improved public health, and encourage adoption of environmentally beneficial efficient electric technologies. Overall, the 2022 amendments are expected to reduce electricity and fossil fuel natural gas usage when compared to continued compliance with the 2019 Energy Code requirements. It is anticipated that the new 2022 Title 24 energy standards will result in a 10.9 percent increase in energy efficiency for multi-family uses over the previous code and a 14.2 percent increase for single family uses (California Energy Commission [CEC] 2021).

New construction and major renovations must demonstrate their compliance with the current Energy Code through submission and approval of a Title 24 Compliance Report to the local building permit review authority and the CEC. The compliance reports must demonstrate a building's energy performance through use of CEC approved energy performance software that shows iterative increases in energy efficiency given the selection of various heating, ventilation, and air conditioning; sealing; glazing; insulation; and other components related to the building envelope.

Title 24, Part 11 – California Green Building Standards

The California Green Building Standards Code, referred to as CALGreen, was added to Title 24 as Part 11 first in 2009 as a voluntary code, which then became mandatory effective January 1, 2011 (as part of the 2010 CBC). The most recent 2022 CALGreen, which goes into effect January 1, 2023, institutes mandatory minimum environmental performance standards for all ground-up new

construction of non-residential and residential structures. Local jurisdictions must enforce the minimum mandatory Green Building Standards and may adopt additional amendments for stricter requirements.

The mandatory standards require:

- Electric vehicle charging for new construction;
- Outdoor water use requirements as outlined in Model Water Efficient Landscape Ordinance emergency standards;
- Requirements for water conserving plumbing fixtures and fittings;
- 65 percent construction/demolition waste diverted from landfills;
- Infrastructure requirements for electric vehicle charging stations;
- Mandatory inspections of energy systems to ensure optimal working efficiency; and
- Requirements for low-pollutant emitting exterior and interior finish materials such as paints, carpets, vinyl flooring, and particleboards.

2022 CALGreen also include residential and non-residential voluntary measures that go beyond the mandatory requirements. Similar to the reporting procedure for demonstrating Energy Code compliance in new buildings and major renovations, compliance with the CALGreen water reduction requirements must be demonstrated through completion of water use reporting forms for new low-rise residential and non-residential buildings.

3.2.3 Local

3.2.3.1 General Plan

The City General Plan includes several climate change-related policies to ensure that GHG emissions reductions are imposed on future development and City operations. For example, Conservation Element policy CE-A.2 aims to "reduce the City's carbon footprint" and to "develop and adopt new or amended regulations, programs, and incentives as appropriate to implement the goals and policies set forth" related to climate change. The Land Use and Community Planning, Mobility, Urban Design, and Public Facilities and Safety Element also contain policy language related to sustainable land use patterns, alternative modes of transportation, energy efficiency, water conservation, waste reduction, and greater landfill efficiency.

3.2.3.2 Otay Mesa Community Plan Final Environmental Impact Report

The OMCP was evaluated in a Program EIR (No. 30330/304032; SCH No. 2004051076) that was certified by the San Diego City Council on March 11, 2014, via Resolution No. R-308810. The OMCP FEIR (City of San Diego 2013) concluded that the project would result in significant and unmitigated environmental impacts to air quality, GHG emissions, noise, traffic/circulation, and utilities. The following issue areas were determined to be significant but mitigated to below a level of significance with mitigation: land use, biological resources, historical resources, hydrology/water quality, geology. and paleontological resources. All other impacts analyzed in the EIR were determined to be less than significant.

Pertinent to GHG emissions, the OMCP FEIR (Section 5.18) provided an analysis of GHG emission impacts associated with the implementation of the OMCP. The OMCP FEIR anticipated the development of the Specific Plan area with up to 5,880 units (see Table 2-5 of the OMCP). The OMCP FEIR found that impacts related to GHG emissions related to both policy consistency and GHG emissions would be significant and unavoidable even with the implementation of the following mitigation framework:

GHG-1: Future projects implemented in accordance with the CPU shall be required to demonstrate their avoidance of significant impacts related to long-term GHG emissions. The Mobility, Urban Design, and Conservation elements of the CPU include specific policies to require dense, compact, and diverse development, encourage highly efficient energy and water conservation design, increase walkability and bicycle and transit accessibility, increase urban forestry practices and community gardens, decrease urban heat islands, and increase climate-sensitive community design. These policies would serve to reduce consumption of fossil-fueled vehicles and energy resulting in a reduction in communitywide GHG emissions relative to BAU. Future projects implemented in accordance with the CPU shall be required to incorporate GHG reducing features or mitigation measures in order to show a 28.3 percent reduction in GHG emissions, relative to BAU, to meet AB 32 year 2020 target levels. Quantifiable GHG reduction measures at the level of subsequent projects consist of:

- Building and non-building energy use
- Indoor and outdoor water use
- Area sources
- Solid waste disposal
- Vegetation/carbon sequestration
- Construction equipment
- Transportation/vehicles

GHG-2: Future projects implemented in accordance with the CPU shall be required to demonstrate their avoidance of significant impacts related to long-term operational emissions as identified in mitigation measure GHG-1 in Section 5.18.3.3 [of the CPU].

The approximate gap of 16.9 to 19.2 percent in meeting the target reductions shall consist of one or a combination of several effective and quantifiable GHG reduction measures that pertain to: building and non-building energy use; indoor and outdoor water use; area sources; solid waste disposal; vegetation/carbon sequestration; construction equipment; and transportation/vehicles. Project-level GHG reduction design features shall demonstrate a reduction in BAU GHG emissions to 28.3 percent or more relative to BAU, and to the extent practicable, shall be required for future development projects implemented in accordance with the CPU.

The City adopted a CAP in 2015 and an update CAP in 2022 (see Section 3.2.3.3) to address GHG emissions in the City. The analysis herein is updated and consistent with the 2022 CAP, CAP Consistency Regulations and associated 2022 City Significance Determination Thresholds. Per the City Significance Determination Thresholds (City of San Diego 2022a), plan-level analysis must demonstrate consistency with the CAP strategies per the Climate Action Plan Consistency for Plan- and Policy-Level Documents and Public Infrastructure Projects Memorandum (Attachment 1).

Projects must complete a land use consistency and CAP Consistency Regulations conformance analysis to determine significance. This is discussed in more detail in Section 3.2.3.3 below. Therefore, Mitigation Framework GHG-1 and GHG-2 do not apply to the project.

3.2.3.3 Climate Action Plan

On August 2, 2022, the City approved an updated CAP, revised GHG CEQA significance thresholds, CAP Consistency Regulations, and associated Climate Resiliency Fund and Urban Tree Canopy fee. The 2022 CAP update expands the prior CAP approach and identifies six strategies for achieving the goal of net zero emissions:

1. Strategy 1: Decarbonization of the Built Environment
2. Strategy 2: Access to Clean and Renewable Energy
3. Strategy 3: Mobility and Land Use
4. Strategy 4: Circular Economy and Clean Communities
5. Strategy 5: Resilient Infrastructure and Healthy Ecosystems
6. Strategy 6: Emerging Climate Actions

These six strategies aim to set the City on a path towards an ambitious goal of net zero emissions by 2035. Strategy 1: Decarbonization of the Built Environment, addresses natural gas consumption in all buildings, both new development, and in the timespan of the CAP, existing buildings. Strategy 2: Access to Clean and Renewable Energy, maintains the 100 percent renewable energy measure and acknowledges San Diego Community Power as a key pathway to achieving the renewable target. Strategy 2 additionally includes targets for converting the City's vehicle fleet to electric and supports increasing electric vehicles used in the community. Strategy 3, Mobility and Land Use, focuses on emissions from transportation and establishes actions that support mode shift through mobility and land use actions and policies. Strategy 4: Circular Economy and Clean Communities, expands on current zero waste goals and maintain gas capture measures, prevent waste from entering the landfill, and support efforts to increase composting and prevent food waste in response to SB 1383. Strategy 5: Resilient Infrastructure and Healthy Ecosystems, addresses resiliency in the face of the impacts of climate change with a focus on greening the city, starting with Communities of Concern. Community of Concern means a census tract that has been identified as having very low, low, or moderate access to opportunity as identified in the San Diego Climate Equity Index.

The newest strategy, Strategy 6: Emerging Climate Actions, addresses those GHG emissions that will remain after all current identified measures have been achieved, which account for roughly 20 percent of total GHG emissions by 2035. This new strategy allows the City to address limitations in quantification GHG emissions and science and technology by identifying additional actions, pursuing technological innovation, expanding partnerships and supporting research that reduces GHG emissions in all sectors.

3.2.3.4 Climate Action Plan Consistency Regulations (SDMC Chapter 14, Article 3, Division 14)

To facilitate implementation of the CAP, the City adopted CAP Consistency Regulations as Chapter 14, Article 3, Division 14. The CAP Consistency Regulations apply to specified ministerial and discretionary projects to ensure compliance with the goals and objectives of the updated CAP. The CAP Consistency Regulations will apply to the following projects:

- Development that results in three or more total dwelling units on all premises in the development;
- Non-residential development that adds more than 1,000 square feet and results in 5,000 square feet or more of total gross floor area, excluding unoccupied spaces such as mechanical equipment and storage areas; and
- Parking facilities as a primary use.

The CAP Consistency Regulations require the following:

1. Pedestrian enhancements to reduce heat island effect
   - Where the premises contains a street yard or abuts the public right-of-way, shading of at least 50 percent of the Throughway Zone is required.
   - Where development does not contain a street yard or abut a public right-of-way with a Furnishings Zone, a specified number of trees shall be planted on-site or at an off-site location within one mile of the development. If trees cannot be planted, an Urban Tree Canopy Fee shall be paid.
2. Development on a premises with 250 linear feet or more of street frontage shall provide and privately maintain at least one of the following publicly accessible pedestrian amenities for every 250 linear feet of street frontage to the satisfaction of the Development Services Department:
   - One trash receptacle and one recycling container;
   - Seating comprised of movable seats, fixed individual seats, benches with or without backs, or design feature seating, such as seat walls, ledges, or seating steps;
   - Pedestrian-scale lighting that illuminates the adjacent sidewalk;
   - Public artwork;
   - Community wayfinding signs; or
   - Enhancement of a bus stop or public transit waiting station within 1,000 feet of the premises.
3. At least 50 percent of all residential and non-residential bicycle parking spaces required in accordance with Chapter 14, Article 2, Division 5 shall be supplied with individual outlets for electric charging at each bicycle parking space.

If a project is unable to comply with one or more of the CAP Consistency Regulations, the project will be required to obtain a Process Two Neighborhood Development Permit with deviation findings specifying how the project will reduce GHG emissions in a manner comparable to the regulation(s) the project is deviating from.

3.2.3.5 Regional Transportation Plan/Sustainable Communities Strategy

San Diego Forward: The 2021 Regional Plan is the 2050 Regional Transportation Plan (RTP) prepared by SANDAG and adopted in December 2021. The RTP establishes an implementation plan for how the region will grow over the next 30 years. Developed in accordance with California Senate Bill 375, the RTP includes a Sustainable Communities Strategy (SCS). An SCS demonstrates how the region will meet its GHG reduction targets through integrated land use, housing, and transportation planning. While the purpose of an SCS is to reduce GHG emissions due to mobile sources, it also results in a decrease in mobile sources of criteria pollutants. Enhanced public transit service combined with incentives for land use development that provides a better market for public transit will play an important role in the SCS.

The SCS focuses on the following five main strategies, referred to as the 5 Big Moves, that will result in a more efficient transportation system:

- Complete Corridors – Complete corridors act as the backbone of the entire regional transportation system, using technology, infrastructure improvements, pricing, and connectivity to support all forms of movement.
- Transit Leap – Transit leap offers people a network of high-capacity, high-speed, and high-frequency transit services that will incorporate new modes of transit while also providing improved existing services.
- Mobility Hubs – Mobility hubs are the centers of activity where a high concentration of people, destinations, and travel choices converge. They offer on-demand travel options and safe streets to enhance connections to high-quality transit while also making it easier for people to take short trips without needing a car.
- Flexible Fleets – Flexible fleets offer people a variety of on-demand, shared vehicles, including microtransit, bikeshare, scooters, and other modes of transportation, to connect them to transit and make travel easy within Mobility Hubs.
- Next Operating System (OS) – Next OS refers to an integrated digital platform that ties the transportation system together. Next OS enables the transportation system to be managed in real time so that people can be connected immediately to the modes of transportation that work best for them for any given situation and at any time.

The SCS land use pattern concentrates development into either Mobility Hubs or Smart Growth Opportunity Areas. The SCS land use pattern accommodates the 6th Cycle RHNA allocations between 2020 and SCS target year 2035.

4.0 Significance Criteria

The following significance thresholds were used by the OMCP FEIR to determine the significance of GHG impacts associated with implementation of the Otay Mesa CPU:

a. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emission of GHGs.

b. Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.

In the time following the certification of the FEIR for the OMCP (2014), the City adopted a CAP which was recently updated as of 2022. For purposes of analysis herein, the City's 2022 Significance Determination Thresholds are used in order to provide a consistent, localized, and comprehensive approach for the assessment of GHG impacts.

Applicable initial study questions from the City's 2022 CEQA Significance Determination Thresholds are as follows:

Would the project:

a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

b. Conflict with the City's Climate Action Plan or another applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

The following thresholds are used to evaluate potential GHG impacts associated with the project. The method for determining significance depends on whether the action requires plan- or policy-level or project-level environmental analysis. For the proposed Southwest Village project, both a project-level and a plan- and policy-level environmental document are required, therefore both thresholds are used.

4.1 Plan- and Policy-level Threshold

For plan- and policy-level environmental documents, as well as environmental documents for public infrastructure projects, the Planning Department has prepared a Memorandum, Climate Action Plan Consistency for Plan- and Policy-Level Documents and Public Infrastructure Projects (see Attachment 1), to provide guidance on significance determination as it relates to consistency with the strategies in the Climate Action Plan.

As detailed in Attachment 1, the City's guidance document requires environmental documents to address the ways in which the plan or policy is consistent with the goals and policies of the General Plan and CAP, specifically General Plan Policies LU-A.7, ME-B.9, CE-J.2, and CE-J.3 and Strategy 3 from the CAP, although all six strategies from the CAP should be discussed. Additionally, the analysis

should discuss the applicability of the City's CAP Consistency Regulations. As adoption of the Specific Plan is a plan-level document, this threshold applies to the Specific Plan analysis.

4.2 Project-level Threshold

For project-level environmental documents, significance is determined through (a.) land use consistency and (b.) project compliance with the regulations set forth in SDMC Chapter 14, Article 3, Division 14. The first step in determining CAP consistency for development projects is to assess the project's consistency with the growth projections used in the development of the CAP. If a project cannot answer "yes" to one of the three options below, then the project's cumulative GHG impact is significant and the project must prepare a comprehensive project-specific analysis of GHG emissions, including quantification of existing and projected GHG emissions.

a. Is the proposed project consistent with the existing General Plan and Community Plan land use and zoning designations?[1]; OR

b. If the proposed project is not consistent with the existing land use plan and zoning designations, and includes a land use plan and/or zoning designation amendment, would the proposed amendment result in an increased density within a Transit Priority Area (TPA)[2]?; OR

c. If the proposed project is not consistent with the existing land use plan and zoning designations, does the project include a land use plan and/or zoning designation amendment that would result in an equivalent or less GHG-intensive project when compared to the existing designations?

The second step in demonstrating CAP consistency is a review to ensure project consistency with the regulations set forth in SDMC Chapter 14, Article 3, Division 14 to ensure that new development is consistent with the CAP's assumptions. Projects 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 that do not comply with the CAP Consistency Regulations set forth in SDMC Sections 143.1410 and 143.1415 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 Climate Action Plan.

[1]This question may also be answered in the affirmative if the project is consistent with SANDAG Series 14 growth projections, which were used to determine the CAP projections, as determined by the Planning Department.

[2]This category applies to all projects that can answer the following in the affirmative: Is the project premises located wholly within a transit priority area, or on a premises where at least 50 percent of the gross floor area of the new development would be located on the portion of the premises within a transit priority area?

Projects that can answer "yes" to one of the options in step 1 and comply with the regulations in step 2 would have a less than significant impact from GHG emissions, as these projects would be determined to be consistent with the CAP

Pursuant to CEQA Guidelines Sections 15183.5(b), 15064(h)(3), and 15130(d), the City may determine that a project's incremental contribution to a cumulative GHG effect is not cumulatively considerable if the project complies with the requirements of a previously adopted GHG emission reduction plan. The City's CAP is a qualified GHG reduction plan based on CEQA Guidelines Section 15183.5(b)(1)(A-F).

5.0 GHG Impact Analysis

The OMCP FEIR identifies Mitigation Framework GHG-1 and GHG-2. However, as discussed in Section 3.2.3.2, the threshold identified in GHG-1 and GHG-2 is no longer valid and therefore does not apply to the project. Program-level and project-level GHG impacts are assessed by determining consistency with the City's CAP, which is a qualified GHG reduction plan.

5.1 Program-level Analysis

As specified in Section 4.1, the method for determining the Specific Plan's consistency with the CAP is accomplished through evaluation of the proposed Specific Plan with General Plan policies LU-A.7, ME-B.9, CE-J.2, and CE-J.3 and consistency with CAP strategies, specifically Strategy 3. Consistency with these strategies is detailed in Table 4.

The Southwest Village Specific Plan would implement the planned land uses and densities laid out in the OMCP, which envisions a new village development, focused around a high-density village core that will accommodate a mobility hub with access to transit. The plan is designed around a grid network that emphasizes multi-modal opportunities and connections.

The project is consistent with the City's CAP, as demonstrated by the policy consistency discussion provided in Table 4. Specifically, Specific Plan consistency is demonstrated for General Plan policies LU-A.7, ME-B.9, CE-J.2, and CE-J.3 and consistency with all CAP strategies, specifically Strategy 3. As a result, unlike the significant and unavoidable impacts identified in the OMCP FEIR, GHG impacts resulting from the Specific Plan would be less than significant.

Table 4 Plan-Level Climate Action Plan Consistency Analysis for the Southwest Village Specific Plan	
Policy Language	Consistency Discussion
Consistency with General Plan Policies	
General Plan Policy LU-A.7 Determine the appropriate mix and densities/intensities of village land uses at the community plan level, or at the project level when adequate direction is not provided in the community plan. a. Consider the role of the village in the City and region; surrounding neighborhood uses; uses that are lacking in the community; community character and preferences; and balanced community goals (see also Section H). b. Achieve transit-supportive density and design, where such density can be adequately served by public facilities and services (see also Mobility Element, Policy ME-B.9). Due to the distinctive nature of each of the community planning areas, population density and building intensity will differ by each community. c. Evaluate the quality of existing and planned transit service.	Consistent. The project includes both a Community Plan Amendment and a rezone to establish the Specific Plan and base zones. The OMCP Vision Map (OMCP Figure 1-2) identifies the Southwest Specific Plan as a Village Opportunity area that would contain a mix of local commercial, office and multifamily residential uses around a village center designed to encourage pedestrian-oriented design and encourage transit ridership. Section 2.1 of the OMCP addresses implementation of the Specific Plan Areas and a Specific Plan be approved prior to implementation of a comprehensive development or rezoning proposal. The Specific Plan includes policies demonstrating consistency with applicable OMCP policies. The proposed Specific Plan land uses are consistent with the land use types and intensities anticipated by the OMCP and is consistent with the City's General Plan City of Villages strategy which envisions build-out of this area to support a village center. The OMCP identifies a future rapid transit route traversing the Specific Plan area. The Specific Plan provides the land use and zoning to support future planned transit connections that would connect the area to San Ysidro through the extension of Beyer Boulevard. The Specific Plan land use plan identifies a village core with a mobility hub surrounded by residential densities that would be supportive of future high quality transit services. The proposed land uses and zoning designations associated with the Specific Plan provide capacity for transit-supportive employment densities within the planned village core. Commercial land uses adjacent to the mobility hub would support employment opportunities within the village core. The Specific Plan would support up to 175,000 square feet of commercial and retail uses in the mixed-use village core.
General Plan Policy ME-B.9 Make transit planning an integral component of long range planning documents and the development review process.	Consistent. Future transit routes and stops within the Mobility Chapter of the Specific Plan and a mobility hub is identified in the village core of the Land Use chapter of the Specific Plan. Consistent with the planned mobility

Table 4 Plan-Level Climate Action Plan Consistency Analysis for the Southwest Village Specific Plan	
Policy Language	Consistency Discussion
a. Identify recommended transit routes and stops/stations as a part of the preparation of community plans and community plan amendments, and through the development review process. b. Plan for transit-supportive villages, transit corridors, and other higher intensity uses in areas that are served by existing or planned higher-quality transit services, in accordance with Land Use and Community Planning Element, Sections A and C. c. Proactively seek reservations or dedications of right-of-way along transit routes and stations through the planning and development review process. d. Locate new public facilities that generate large numbers of person trips, such as libraries, community service centers, and some recreational facilities in areas with existing or planned transit access. e. Design for walkability in accordance with the Urban Design Element, as pedestrian supportive design also helps create a transit supportive environment. f. Address rail corridor safety in the design of development adjacent to or near railroad rights-of-way.	hub and as detailed in the OMCP (Figure 3-1), a future rapid transit route is planned to traverse the Specific Plan area. The SANDAG RTP identifies this rapid transit connection through the Specific Plan Area, with funding anticipated by 2050. The Specific Plan supports these planned transit routes by providing for transit supportive densities within a future village core that will accommodate a mobility hub in anticipation of the future rapid bus line. The mobility hub would be designed to serve a primary connection point for community and regional bicycle facilities, sidewalks, trails and paseos that connect the neighborhoods, parks, and open space. This location would provide pick-up and drop-off staging areas for bus services and private transportation options such as employer shuttles and rideshare services, as well as a bike share, repair, and electric vehicle charging stations. The Specific Plan is additionally planned to include a number of parks connected by pedestrian facilities including trails, sidewalks and paseos. Beyer Boulevard provides pedestrian access to the west to San Ysidro and a primitive trail is additionally provided to the west to connect to the City's planned Beyer Park project in San Ysidro. Two school sites are identified within the Specific Plan area which will offer local schools to area residents, connected by bicycle and pedestrian facilities to support non-vehicular trips.
General Plan Policy CE-J.2 and CE-J.3 CE-J.2 Include community street master plans in community plans, prioritize community streets for street tree programs, identify the types of trees proposed for those priority streets by species (with acceptable alternatives) or by design form, integrate known protected trees and inventory other trees that may be eligible to be designated as a protected tree.	Consistent. The Specific Plan calls for tree planting in villages, sidewalks, and other urban public spaces and identifies tree species to define the street tree program for the Specific Plan. The Specific Plan incorporates design standards, policies, and strategies that promote extensive tree planting throughout the Specific Plan area. Specific Plan Section 3.6 includes a policy to plant trees along streets, pathways, paseos and trails and incorporate trees into public outdoor spaces such as plazas and parks to provide shade, beauty and buffer. Another policy in this section states,

Table 4 Plan-Level Climate Action Plan Consistency Analysis for the Southwest Village Specific Plan	
Policy Language	Consistency Discussion
CE-J.3 Develop community plan street tree master plans during community plan updates in an effort to create a comprehensive citywide urban forest master plan.	"Plant designated Themed Street Trees along all public roadways, as identified for each roadway type in Sections 4.5.1 through 4.5.10. Each roadway includes specifications for Themed Street trees in Chapter 4.0 of the Specific Plan. The Specific Plan includes a landscape plant palette as Appendix A to the Specific Plan. Numerous trees in various sizes are identified for neighborhoods, streetscapes, parks, interior slopes, and trailheads. All trees would be a minimum 36 inch wide box size. Various species, mature height and spread are identified to allow for appropriate sizing depending on parkway widths. Additionally, development in the Specific Plan is subject to the City's CAP Consistency Regulations which includes minimum tree planting standards and requirements for providing shading along roadways. Additionally, under existing conditions, the Specific Plan is undeveloped within limited trees. Currently, vegetation in the area is a mix of native and non-native shrub, grassland, disturbed land, and herbaceous species typical of somewhat impacted California coastal sage scrub throughout the region. The entire project footprint would require grading to support the proposed development. As there are very limited to no trees within the majority of the Specific Plan area, the project would result in significantly more trees than the existing condition. The Plan incorporates design standards, policies, and strategies that promote extensive tree planting throughout the Southwest Village Specific Plan development area.

Table 4 Plan-Level Climate Action Plan Consistency Analysis for the Southwest Village Specific Plan	
Policy Language	Consistency Discussion
Consistency with Climate Action Plan Strategies	
Strategy 1: Decarbonization of the Built Environment **This strategy aims to dramatically avoid greenhouse gas emissions from buildings across the City and to improve our indoor air quality. It includes measures to address emissions from existing buildings and municipal facilities and for new development.**	
Measure 1.1: Decarbonize Existing Buildings	Not applicable. The project does not include existing buildings.
Measure 1.2 Decarbonize New Building Development Develop and adopt a Building Electrification policy, through code update or other mechanism, requiring new residential and commercial buildings to eliminate the use of natural gas, increase energy efficiency, increase distributed energy generation and storage and increase EV charging stations, engaging with residents of Communities of Concern, workers, and builders Prioritize cool roofs when feasible to implement Climate Resilient SD in energy efficiency building code update. • Support new regional policies for alternative systems that can be used to replace existing heating and cooling air systems and water systems. • Establish policies that incentivize developers to use less GHG intensive materials and practices (EVs, Low-Carbon concrete, recycled materials, etc.) including mass timber and modular construction	Consistent. The City is responsible for developing EV policies, therefore that component of this measure is not applicable. The Specific Plan would require all dwelling units to be constructed in compliance with state or local green building standards in effect at the time of building construction. While a building electrification policy code update or other reach codes are not currently in effect, all future development within the Specific Plan would be required to comply with applicable codes in effect at the time of building permits. Additionally, the first phase of development is committed to an all-electric development with no natural gas. Electric vehicle charging would be provided consistent with 2022 CALGreen building standards which went into effect January 1, 2023.
Measure 1.3: Decarbonize City Facilities Supporting Actions • Future development on city-owned property will require and reward proposals based on decarbonization and other CAP goals. 2030 Target Phase out 50% of natural gas usage in municipal facilities 2030 GHG Reduction (MT CO2e) 15,148 2035 Target Phase out 100% natural gas	Not applicable. The project does not include the development of City Facilities.

Table 4 Plan-Level Climate Action Plan Consistency Analysis for the Southwest Village Specific Plan	
Policy Language	Consistency Discussion
usage in municipal facilities 2035 GHG Reduction (MT CO2e) 32,638 • Implement energy efficiency projects at City facilities to meet zero emissions goals for municipal buildings established in the Municipal Energy Strategy & Implementation Plan, prioritizing projects within the City's Communities of Concern. • Implement technologies such as renewable electricity generation, heat pumps, energy storage, and microgrids at City facilities to meet the zero emissions goals for municipal buildings established in the Municipal Energy Strategy & Implementation Plan. • Identify and prioritize energy projects at City facilities that increase resiliency for the surrounding communities and City operations, focusing on our Communities of Concern. • Convert all streetlights to LED lights and explore auto-dimming technology where public safety would not be compromised. • Convert all traffic signals to LED lights. Strategy 1 Supporting Actions. • Remove high-Global Warming Potential refrigerants - develop a refrigerant management program that establishes a phaseout timeline for high-Global Warming Potential refrigerants. • Advance workforce development programs for decarbonization including energy efficiency and renewable energy projects.	
Strategy 2: Access to Clean & Renewable Energy This strategy maintains the City's commitment to 100% renewable energy and now acknowledges that the pathway to achieve this target is through San Diego Community Power. It also sets more ambitious targets for converting the City's fleet of vehicles to electric and for the first time aims to increase the number of electric vehicles used by our communities.	

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Policy Language	Consistency Discussion
Measure 2.1: Citywide Renewable Energy Generation Supporting Actions • Develop financial support programs to incentivize solar on multifamily buildings, providing financial benefits to tenants and families within Communities of Concern. • Develop financial support programs to incentivize deployment of building scale renewables and mandate the use of renewables through building codes, while engaging residents and other stakeholders in the process. • Increase renewable generation at non-residential developments through new policies or incentive programs. • Update land use code to include energy storage and other distributed energy technologies to facilitate local renewable energy resource deployment. • Deploy advanced renewable energy technologies (e.g. battery energy storage systems, microgrids, etc.) at municipal facilities to demonstrate feasibility. • Leverage municipal facilities to establish community solar and microgrid solutions when tariffs allow. • Explore partnerships for a trade-in program that makes it possible for small landscape owners to transition to electric equipment	Not applicable. The City is responsible for developing financial support programs; therefore, that component of this measure is not applicable to the project.
Measure 2.2: Increase Municipal Zero Emission Vehicles Seek partnerships with SDCP, SDG&E and others to install charging infrastructure for all vehicle types. • Include stated preference for 100% renewable energy on public ally available chargers on municipal land.	Not applicable. The project is not a municipal project.

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Policy Language	Consistency Discussion
• Update AR 35.80 to include EV vehicles to the list of preferred purchases. • Conduct City fleet electrification study to determine best siting, funding needs, and strategies including specific strategies for the Chollas operations yard. • Update municipal parking yard electric infrastructure to support electric vehicle charging needs. • Create standards for the City's purchase of fuel for fleet vehicles that contains the lowest levels of lifecycle GHG emissions available. • Explore pilot projects for a variety of grid resilience services (demand response, emergency back-up, demand charge reduction, etc.) through three modes of EV integration (grid-to-vehicle, vehicle-to-building, vehicle-to-grid.	
Measure 2.3: Increase Electric Vehicle Adoption Develop a citywide electric vehicle strategy to accelerate EV adoption, including flexible fleets, circulators and electric bicycles, focusing on the barriers to ownership and charging for residents within the Communities of Concern.	Not applicable. The City is responsible for developing EV policies. Nonetheless, it is noted that the Specific Plan would provide the necessary EV charging infrastructure to allow for the opportunity to create EV integration.
Strategy 3: Mobility & Land Use **This strategy focuses on emissions from transportation, which account for more than half of all greenhouse gas emissions in San Diego. It also includes actions that support mode shift through mobility and land-use actions and policies.**	
Measure 3.1: Safe and Enjoyable Routes for Pedestrians and Cyclists Actions • Develop Safe Routes to Schools safety plans; start a San Diego Safe Routes to Schools program focusing on Communities of Concern and underperforming schools.	Consistent. The City is responsible for developing City policies and programs; therefore, those components of this measure are not applicable to the project. The Specific Plan supports and plans for future high-quality transit through the Specific Plan area as discussed above under the consistency analysis for General Plan Policy ME-B.9. Additionally, the Specific Plan is located in area designated as having a low Climate Equity

Table 4 Plan-Level Climate Action Plan Consistency Analysis for the Southwest Village Specific Plan	
Policy Language	Consistency Discussion
• Implement the City's Bicycle Master Plan and community plan bicycle networks with a Class IV First approach. • Review and improve flexible fleets and micro-mobility policies/shared use mobility programs, especially focused in Communities of Concern and first mile/last mile applications. • Partner with micro-mobility operators to optimize the number of scooters available in mobility hubs and/or near transit. 2030 Target 19% walking and 7% cycling mode share of all San Diego residents' trips 2030 GHG Reduction (MT CO2e) 79,722 2035 Target 25% walking and 10% cycling mode share of all San Diego residents' trips 2035 GHG Reduction (MT CO2e) 115,315 • Update Bicycle Master Plan with current best practices for facility designation, reflecting recent community plan updates and proposed regional connections. Also describing existing constraints, opportunities, and implementation strategies. • Develop a Mobility Master Plan to reduce mobile sources emissions and further a shift in mode. • The City will evaluate existing and future fee structures to increase the priority of active transportation project implementation, especially within Communities of Concern, and the City will increase its efforts to identify and pursue grant funds for the planning and implementation of active transportation projects. Supporting Actions • Examine proposed bike and pedestrian projects and use "quick-build" pathways where appropriate to increase financial viability. • Increase education campaigns to improve motorist behavior to result in a safer right-of-way for bicyclists and pedestrians. • Include in Bicycle Master Plan update policies and programs to increase bicycle storage near new bikeways.	Index (CEI) indicating the residents in the area may have low access to opportunity, representing communities of concern. The transit and bicycle opportunities proposed within the Specific Plan would offer communities of concern access to new high quality pedestrian and bicycle facilities including local access to parks and schools, as further detailed below. **Pedestrians:** The Specific Plan's circulation system would provide multiple and direct pedestrian connections and accessibility to local activity centers. The Specific Plan provides for an interconnected system of paseos, pedestrian nodes, trails and sidewalks connecting pedestrians to parks, to future transit stops, a school site, and the commercial center within the Specific Plan area. In addition to this pedestrian and trail network, the Specific Plan would incorporate residential and urban paseos that would provide pedestrian pathways between residential and mixed- use areas that are separated from roadways and parking areas. Chapter 3.0 of the Specific Plan's Design Guidelines and Standards provides a number of design recommendations for walkability that would be implemented as the Specific Plan is developed. Section 3.5 of the Specific Plan identifies Streetscape and Public Realm Design Policies that address providing accessible pedestrian connections, providing lighting, hardscape, furnishings, and signage for an enhanced pedestrian experience. The pedestrian opportunities throughout the Specific Plan are a focal point of the grid street network and connections are located so that residents can access amenities (parks, trails, schools, the village center, and transit) on-foot. Pedestrian paseos are encouraged in all developments, and pedestrian nodes would be incorporated into design plans to function as community gathering spaces. The Specific Plan includes a number of policies that would ensure that build-out of the Specific Plan would prioritize pedestrian improvements. For example, Section 6 of the Specific Plan identifies a site design measures that would support pedestrian opportunities and experience:

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Policy Language	Consistency Discussion
• Where roadway widenings are otherwise planned, identify opportunities to repurpose the use of the right-of-way for walking, rolling, biking, and transit modes of travel. • Identify and address gaps in the City's pedestrian network and opportunities.	• Developments shall incorporate safe pedestrian connections to adjoining residential developments, commercial projects, and open space area • Minimize cross-circulation between vehicles and pedestrians • Provide a continuous, clearly marked walkway from parking areas to main building entrances of buildings • Special paving should be incorporated into pedestrian walkways, crosswalks, intersections, plazas and parking lot design and driveway entries to improve pedestrian safety and create a sense of place. • Pedestrian-scale lighting should be installed at building entryways, bicycle-parking areas, seating areas, transit stops, surface parking areas, common open space areas, paseos, and other pedestrian paths. • Pedestrian seating and benches should be installed when feasible, should adhere to ADA standards, and should not obstruct pedestrian pathways. In addition to the referenced Specific Plan policies, future development would be required to demonstrate consistency with the City's CAP regulations including the provision of pedestrian amenities where applicable. **Cyclists:** Chapter 4.0 of the Specific Plan identifies a mobility network that provides a pedestrian-focused grid and a land use pattern to encourage walking, biking and transit use within the Village Core. The Specific Plan provides pedestrian and bicycle connections to facilitate and provide safe access to transit for future residents. Caliente Avenue and Beyer Boulevard East are planned as a modified 4-lane Urban Major that accommodates both a Class IV bike facility within the roadway in addition to a Class II bike lane and pedestrian sidewalk in both directions separated by a landscaped median. Beyer Boulevard West is a modified 4-lane Urban Collector that would narrow to two lanes due to biological constraints. Despite the

Table 4 Plan-Level Climate Action Plan Consistency Analysis for the Southwest Village Specific Plan	
Policy Language	Consistency Discussion
	significant constraints, adequate pedestrian and bicycle connections would be provided including sidewalks on each side and buffered Class II bike facilities on each side. These facilities would support high quality connections to future transit with the planned mobility hub to be located at the intersection of Caliente Avenue and Beyer Boulevard. The mobility hub is anticipated to provide other mobility choices such as micro-mobility options (scooter/bicycle rentals) and rideshare parking. The Specific Plan identifies a bicycle network in section 4.0 of the Specific Plan which calls for Class II (bike lane with buffer) and Class IV bikeways through the community, with some roadways providing duplicate bicycle facilities. Specific bicycle facilities by roadway segment are described in Table 4.2 of the Specific Plan. Planned bicycle facilities would provide high quality connections from Otay Mesa and San Ysidro into the proposed Village Core of the Specific Plan area. Where feasible, facilities would be protected either through separation with a landscape median for or through pavement striping and separation within the roadway. Within the northeastern portion of the planning area, paseo would be designed as a multi-use pedestrian and bicycle path providing bicycle access through this portion of the community.
Measure 3.2: Increase Safe, Convenient, and Enjoyable Transit Use Actions • Advocate for a permanent, regional, Youth Opportunity Pass and support the expansion of the program to include college students and residents in Communities of Concern. • Create a quick build policy and design guidelines to facilitate repurposing of the right-of-way or installation of interim or pilot transit projects. • Develop dedicated bus lanes or shared bus and bike lanes to increase transit efficiency and on-time performance, focusing on routes	Consistent. The Specific Plan supports and incorporates identified future transit routes and stops. The Metropolitan Transit System (MTS) provides bus service (Route 905a and 905b) along Otay Mesa Road and Caliente Avenue north of the Specific Plan area. Route 905 bus stops are also located on the east bound off-ramp and west bound on-ramp at SR-905 and Caliente Avenue. MTS routes 906 and 907 have stops along Beyer Boulevard and San Ysidro Boulevard in San Ysidro west of the Specific Plan area. Currently, the closest bus stop is Route 905 at SR-905 and Caliente Avenue which is approximately one mile from the center of the Specific Plan area. As detailed in the OMCP (Figure 3-1), a future rapid transit route is planned to traverse the Specific Plan area. The SANDAG RTP identifies this rapid transit connection through the Specific Plan Area, with funding

Table 4 Plan-Level Climate Action Plan Consistency Analysis for the Southwest Village Specific Plan	
Policy Language	Consistency Discussion
supporting residents within underserved communities and high-frequency connections for riders going to schools, universities and jobs. 2030 Target 10% transit mode share of all San Diego residents' trips 2030 GHG Reduction (MT CO2e) 162,866 2035 Target 15% transit mode share of all San Diego residents' trips 2035 GHG Reduction (MT CO2e) 234,351 • Implement projects and update the Placemaking Ordinance, including a street furniture program that reduces heat exposure, prioritizes natural shade solutions, provides cool transit stops, and improves access to nearby restrooms in high transit use areas and pedestrian corridors, prioritizing Communities of Concern. • Ensure every high-volume transit stop has access to transit shelters, which include shade structures and benches; work with MTS to establish standard for the provision of bus shelters in the city (e.g., minimum accommodations) with a priority in Communities of Concern. Supporting Actions • Identify transit stops where upgrades are needed, especially in Communities of Concern, and streamline implementation of upgrades to high priority transit stops. • Facilitate partnerships with universities and colleges with goal of student walk/ride/transit use well-above citywide goals. • Prioritize and assist MTS with siting and design of complete transit stops in Communities of Concern, including shade trees, lighting, trash bins. • Create programs and incentives for transit passes bundled with all new major developments within one mile of a major transit stop. • Partner with MTS for priority right of way for buses and trolley in roadway corridors and at intersection.	anticipated by 2050. The Specific Plan supports these planned transit routes by providing for transit supportive densities within a future village core that would accommodate a mobility hub in anticipation of the future rapid bus line. The mobility hub would be designed to serve a primary connection point for community and regional bicycle facilities, sidewalks, trails and paseos that connect the neighborhoods, parks, and open space. This location would provide pick-up and drop-off staging areas for bus services and private transportation options such as employer shuttles and rideshare services, as well as a bike share, repair, and electric vehicle charging stations. A number of these measures are the responsibility of the City and not applicable to the project.

Table 4 Plan-Level Climate Action Plan Consistency Analysis for the Southwest Village Specific Plan	
Policy Language	Consistency Discussion
• Support MTS, SANDAG and Caltrans in the creation of transit right of way for regional transit connections.	
Measure 3.3: Work from Anywhere Supporting Actions • Stand up public Wi-Fi access at City libraries, recreation facilities and various public areas in Low-to-Moderate Income (LMI) areas. • Formalize a regional device refurbishment and distribution program. • Continue to operate a program to loan mobile hotspots and personal computers to residents. • Create a Digital Navigator support line to assist with basic technology issues and provide guidance on low income technology options. • Create a Digital Literacy program to educate residents, particularly in low-to moderate income (LMI) areas. • Work with local organizations to distribute refurbished devices previously used by the City to residents at low or no costs. • Improve and expand data gather and public outreach in Communities of Concern to understand which residents need the most assistance to technology options, what the barriers are to remote work, and improve community's ability to access technology.	Not applicable. The City is responsible for developing policies, programs, and public facility improvements to Wi-Fi; therefore, those components of this measure is not applicable to the project. The project would not prevent implementation of this policy. The project would provide connections to communication systems for telephone, telecom, computers, and cable television to the Specific Plan area, supporting City implementation of this measure.
Measure 3.4: Reduce Traffic Congestion to Improve Air Quality Actions • Install traffic circles and roundabouts. • Retime traffic signals to reduce vehicle fuel consumption through improving the flow of traffic. 2030 Target Install 13 new roundabouts 2030 GHG Reduction (MT CO2e) 1,519 2035 Target Install 20 new	Consistent. Several components of this measure are not applicable to the project, as they are the City's responsibility and outside of the Specific Plan area. The proposed land use and mobility network proposed by the Specific Plan aims to minimize traffic congestion by including an urban core that would offer commercial services to surrounding residents, providing a pedestrian-focused grid, and a planned land use pattern to encourage walking, biking, and transit use. This strategy is intended to limit vehicle trips, resulting in reduced vehicle miles traveled and reduced air and GHG

Table 4 Plan-Level Climate Action Plan Consistency Analysis for the Southwest Village Specific Plan	
Policy Language	Consistency Discussion
roundabouts 2035 GHG Reduction (MT CO2e) 2,037 Supporting Actions • Work with the Port District, SANDAG and Caltrans to prepare a feasibility study to identify the best truck route to Tenth Avenue Marine Terminal and diversion, traffic calming and appropriate signage as included in the APCD's Community Emission Reduction Plan (CERP). • Work with communities to implement comprehensive solutions for the curb space, including implementation of timed parking, establishment of parking districts, and programming of the curb space for deliveries, ADA access and other passenger loading, and micro-mobility.	emissions per capita, satisfying the City's sustainability goals and policies within the General Plan and CAP. Additionally, the Specific Plan identifies public facilities that would be developed within the Specific Plan area, thereby reducing the number of trips required to access these facilities outside the Specific Plan area. An elementary school site is proposed within the Specific Plan area in addition to 36 acres of developed parks. Within the Village Core, a complementary mix of local-serving retail, services, offices, and civic space uses would be located within walking distance to higher density homes. People who visit, reside, and/or work in the Village Core would have easy access to a variety of recreational amenities, including a connective pedestrian and bicycle network, a multi-use community park, and natural open space trail areas. Special events, such as farmers' markets, outdoor concerts, art displays, etc., would be hosted in the mixed-use areas of the Village Core.
Measure 3.5: Climate-Focused Land Use Actions • Focus new development in areas that will allow residents, employees and visitors to safely, conveniently and enjoyably travel as a pedestrian, or by biking, or transit, such as in Transit Priority Areas (TPAs), and areas of the city with the lowest amount of vehicular travel. • Plan for land uses that will allow existing residents, employees and visitors to more safely, conveniently and enjoyably travel as a pedestrian, by walking, biking, or transit. • Update the placemaking ordinance to better support mode shift, to increase accessibility, walkability, and activate public spaces. 2030 Target 8% VMT (commuter and non-commuter) reduction per capita 2030 GHG Reduction (MT CO2e) 341,724 2035 Target 15% VMT	Consistent. While not currently designated a TPA, the Specific Plan would result in densities and transit connection that may support future designation of the area as a TPA. The Specific Plan is designed around a grid network that emphasizes multi-modal opportunities and connections. The Specific Plan mobility plan comprehensively addresses all users to provide a balanced multi-modal complete streets approach. A comprehensive bicycle network (described previously) would ensure connectivity to surrounding communities and the proposed Village Core and mobility hub. A number of paseos are planned to be incorporated into the development concepts to provide enhanced pedestrian connectivity through minimum 10-foot-wide pathways with minimum 2-foot landscape median. Signage and seating would be provided to enhance the pedestrian experience. Modifications to roadway standards have been proposed where appropriate to enhance the experience for all users of the roadway. The Specific Plan would include a variety of parks to provide passive and active recreation opportunities. The Specific Plan identifies two public parks

Table 4 Plan-Level Climate Action Plan Consistency Analysis for the Southwest Village Specific Plan	
Policy Language	Consistency Discussion
(commuter and non-commuter) reduction per capita 2035 GHG Reduction (MT CO2e) 605,185 Supporting Actions • Focus on delivering new mixed-use development on sites, including vacant and underutilized lots, located near transit, such as in TPAs and areas of the city with the lowest amount of vehicular travel. • Implement active transportation in lieu fees to fund pedestrian, cyclist and transit investments where the greatest GHG emissions reductions will result, in accordance with Complete Communities: Mobility Choices. • Amend local regulations, like the Placemaking ordinance, and policies to allow for wider sidewalks and the use of setbacks for public spaces and place making. • Implement temporary and permanent car-free zones/zero emission zones. • Maximize new development in areas located with safe, convenient, and enjoyable access to transit. • Support expansion of urban greenspace including park access, open space, and wildlife corridors where appropriate, along streets to encourage outdoor activity, walking, and increase pedestrian access to parks in Communities of Concern. • Amend the General Plan Mobility Element to include a Complete Streets policy to enable safe, attractive and comfortable access so that pedestrians, bicyclists, motorists and transit users of all ages and abilities can safely travel within the public right of way.	that would be conveyed to the City in addition to a number of other active and passive park spaces to provide an enhanced pedestrian experience within the future TPA. One of the public parks is identified as Central Park, a 10-acre park proposed adjacent to the school site in Planning Area 17. This park would provide joint-use ball fields and other recreational amenities. North Village Park is an approximately 7-acre neighborhood park located within the north portion of Planning Area 2 and 3. North Village Park is planned to include recreational amenities such as hard court areas and sports field. In addition to these publicly maintained parks, privately owned and maintained pocket parks and mini-parks and planned to offer neighborhood gathering spaces, children's play areas and dog parks. All parks are planned with pedestrian and bicycle connections to the planned mobility hub. All of the mobility elements and the public amenities included in the Specific Plan would serve to reduce GHG and air emissions by developing a community that is accessible to all modes.

Table 4 Plan-Level Climate Action Plan Consistency Analysis for the Southwest Village Specific Plan	
Policy Language	Consistency Discussion
• Amend land development code regulations to require more efficient pedestrian access between existing and new development (e.g., between adjacent lots). • Prioritize as part of the Environmental Justice Element work on air quality emissions reduction opportunities with APCD and Communities of Concern.	
Measure 3.6: Vehicle Management Optimize use of curb space including management of on-street parking in TPAs. • Amend the land development code to eliminate parking minimum requirements. • Amend the land development code to establish parking maximum requirements for use types and locations where appropriate. • Amend the land development code to prohibit new auto-oriented land uses that would create conflicts with walking and bicycling within TPAs.	Not applicable. The Specific Plan is not within a TPA and it is the City's responsibility to amend the land development code. Nonetheless, it is noted the Specific Plan does not include parking minimums, allowing for City standards and regulations to guide the provision of parking as the plan is built out. Within the Village Core, parking would be provided internal to the development, allowing for activation of streetscapes and public spaces. Additionally, within the Village Core, parking standards are identified that include designating off-street parking areas for car-sharing services or implementing other parking management strategies, where applicable. Unbundled parking is encouraged in order to separate the price to rent or buy a multi-family home or commercial building from the cost of a parking space. The project would not prevent the City from amending the land development code to include new requirements related to parking and vehicle management.
Strategy 4: Circular Economy & Clean Communities This strategy maintains a 90% waste diversion rate, as well as methane capture from our landfill and wastewater treatment facilities. It also includes actions to increase healthy food access and food recovery.	
Measure 4.1: Changes to the Waste System Actions • Approve and implement the Polystyrene Foam and Single Use Plastics Ordinance, pending Environmental Impact Report.	Not applicable. The City is responsible for amending the land development code. Once the City adopts new regulations to ban polystyrene foam and single use plastics, the regulations would apply residents to the specific Plan area. Nothing contained in the Specific Plan would conflict or prevent implementation of these regulations.

Table 4 Plan-Level Climate Action Plan Consistency Analysis for the Southwest Village Specific Plan	
Policy Language	Consistency Discussion
• Expand the Polystyrene Foam and Single Use Plastics Ordinance to phase-out single-use materials and prioritize reuse rather than disposable goods.	
Measure 4.2: Municipal Waste Reduction Capture landfill methane gas emissions. • Through an update to the City's administrative regulations include purchasing requirements for sustainable products and food whenever option is available. 1) Reduce GHG emissions and water use of total beef, pork, chicken, turkey and dairy purchases by 20%. 2) Increase local, healthy, and sustainable foods to 20% of total food purchases prioritizing locally sourced, valued workforce and animal welfare • Include procurement targets, with a focus on the maintenance of street easements, parks, and other green spaces, for purchasing compost through the Miramar Greenery or other local composting facilities to expand the demand and production of high quality compost in the city.	Not applicable. The project does not include landfill operations and the City is responsible for updates to administrative regulations and City policies. Nonetheless, it is noted each residential unit within the Specific Plan area would be required to provide waste receptacles including trash, recycling, and bins for organics recycling collection in accordance with the City's Recycling Ordinance. Organic waste to be disposed of and composted at a municipal facility. Additionally, composting by individual homeowners is an allowed use. Thus, the Specific Plan would not conflict with the goals for this measure.
Measure 4.3: Local Food Systems & Food Recovery Actions • Create a food council or advisory board with local stakeholders. • Invest in expanding the food waste prevention network - expand infrastructure & partnerships for edible food recovery. • Require food waste prevention, donation and recycling plans for all City food service operations and large events on City managed, leased or owned lands.	Not applicable. The City is responsible for these regional efforts and regulations. The Specific Plan would not prevent implementation of the various programs supporting access to local food programs detailed in this measure. Additionally, the Specific Plan identifies general open space areas that could provide opportunities for community gardens.

Table 4 Plan-Level Climate Action Plan Consistency Analysis for the Southwest Village Specific Plan	
Policy Language	Consistency Discussion
• Establish a multidisciplinary team of subject matter experts across City departments with a focus on land use, economic growth, neighborhood vitality and healthy food access to work with community members to expand urban agricultural programs and develop policies to encourage community based farms, including demonstration projects. Supporting Actions • Working with the County and Farm Bureau to support investments in climate smart agriculture and local food supply chain. • Partner with County of SD to increase community access to Federal meal programs (EBT, WIC, etc.) and incentivize usage of these programs for local food access (CSA, farmers market, retail). • Incorporate food security and resilient local food systems into climate resilience and emergency planning. • Invest in a network of local food sourcing, aggregation, distribution and processing infrastructure including regional food hubs, neighborhood scale commercial kitchens or shared kitchens, and other food businesses, particularly in low-income communities. • Regulate or activate programs for food businesses to minimize food related carbon emissions including requiring food waste prevention, donation and recycling plans for businesses/institutions (for Tier 1 and Tier 2 generators outlined in SB1383) and provide technical assistance and resources. Also include checklist and outreach as part of business licensing process. • Incentivize incorporation of urban agriculture features including indoor agriculture, edible forestry, community gardens, etc. • Increase community participation with Urban Agriculture Incentive Zone (UAIZ) program.	

Table 4 Plan-Level Climate Action Plan Consistency Analysis for the Southwest Village Specific Plan	
Policy Language	Consistency Discussion
Measure 4.4: Zero Waste to Landfill Actions • Update, adopt and implement the Zero Waste Plan. • Create a community reuse and repair program to increase waste diversion, reduce material consumption and develop training and learning opportunities. • Update the Citywide Recycling Ordinance to ban divertible materials (yard waste, food) from residential and commercial trash containers, in compliance with SB 1383. • Develop a marketing plan for compost and mulch developed within the city. Identify and target compost and mulch markets in urban areas as well as urban agriculture. Partner with industries to increase compost and mulch use including landscaping, stormwater and water conservation. • Analyze city regulations and other barriers to developing businesses that reuse or repair consumer goods, where doing so will not adversely impact the surrounding residential neighborhood. • Increase public awareness of and access to opportunities for reuse, product rentals, repair, and donation. • Support and expand citywide reuse infrastructure. Supporting Actions • Support community composting enterprises through strategic partnerships. • Increase enforcement presence to ensure compliance with recently modified City Recycling Ordinance and increase waste diversion.	Not applicable. The City is responsible for these regional efforts and regulations. However, it is noted implementing the Zero Waste plan and Citywide Recycling Ordinance would be a requirement of the Specific Plan. Additionally, each development within the Specific Plan would prepare a Waste Management Plan to identify measures to reduce and recycle construction and demolition waste. The Specific Plan would not prevent the City from implementing programs referenced in this measure.

Table 4 Plan-Level Climate Action Plan Consistency Analysis for the Southwest Village Specific Plan	
Policy Language	Consistency Discussion
• Evaluate and provide input on State and Federal producer responsibility requirements and laws, to focus on hard to recycle and/or hazardous items impacting San Diego's waste stream. • Implement a public mattress recycling drop-off location. • Partner with franchise waste haulers to address barriers to increasing diversion rates. • Continue and enhance public outreach programming that provides residents with strategies for household waste reduction, including from food waste and shipping and packaging (e.g., on-demand deliveries), including outreach in languages that reflect the diverse needs of San Diego. • Amend the Construction & Demolition regulations to establish a deconstruction requirement to reduce demolition waste from construction and renovation, facilitate material reuse and create jobs	
Measure 4.5: Capture Methane from Wastewater Treatment Facilities	Not applicable. The City is responsible for wastewater treatment facilities and no wastewater treatment facility is proposed as a part of the project. The project would not prevent the city from implementing methane capture at wastewater treatment plants.
Strategy 5: Resilient Infrastructure This strategy will help the City thrive in the face of the impacts of climate change through a greater focus on the greening of our City, starting with our Communities of Concern. It also includes targets for the restoration of salt marshland for sequestration and increasing our local water supply through Pure Water San Diego.	
Measure 5.1 Sequestration Actions	Consistent. A substantial portion of the Specific Plan would be preserved as open space. Much of the land surrounding the development area is undevelopable due to steep slopes, canyons, MHPA and vernal pool preserve areas, and geotechnical hazards. Open space areas identified as part of the Southwest Village Specific Plan are adjacent to other existing

Table 4 Plan-Level Climate Action Plan Consistency Analysis for the Southwest Village Specific Plan	
Policy Language	Consistency Discussion
• Protect, restore and enhance urban canyons. Support habitat restoration of urban canyons, inclusion of environmental education and recreation opportunities, and continued preservation. • Develop an area specific management plan to protect, restore and preserve wetland and upland areas on City managed lands, prioritizing Communities of Concern. • Develop Natural Resource Management Plans on all managed preserved lands and include in plans the sequestration as the information becomes available Supporting Actions • Prioritize partnerships with San Diego's tribes and restorative environmental justice opportunities on wetland restoration projects. • Acquire Open Space Conservation Land. • Create a pilot carbon farming program on vacant public land or in partnership with educational institutions and non-profit organizations. • Partner with the San Diego River Conservancy and other agencies to identify sequestration opportunities through restoration projects.	and planned open space areas and would expand the areas included in the City's MHPA. Supporting restoration of the surrounding canyons, the Specific Plan calls for restoration of disturbed lands and habitats within 50 feet of proposed primitive trail alignments (a total 100 feet wide) to prevent access to the unauthorized trails and allow for natural vegetation regrowth to occur for the remaining portions of the unauthorized segments due to non-use. Signage shall be used where appropriate to provide education on trail closures and restoration areas. Additionally, as the Specific Plan is built-out, disturbed slopes adjacent to the surrounding natural habitats would be revegetated with native species.
Measure 5.2: Tree Canopy Actions • Increase tree planting in Communities of Concern starting with the planting of 40K new trees in these communities by 2030. • Create a Street Tree Master Plan with a target of planting 100,000 trees by 2035. Within the Street Tree Master Plan, identify City lands and spaces that need trees and identify ways to increase permeable areas for new trees, focused in Communities of Concern.	Consistent. The City is responsible for the City-wide and regulatory components of this measure. The Specific Plan area along with all of the OMCP area is identified as a Community of Concern. The Specific Plan requires tree planting in villages, sidewalks, and other urban public spaces. The Specific Plan incorporates design standards, policies, and strategies that promote extensive tree planting throughout the Specific Plan area. Specific Plan Section 3.6 includes policy to plant trees along streets, pathways, paseos and trails and incorporate trees into public outdoor spaces such as plazas and parks to provide shade, beauty and buffer. Another policy in this section states, "Plant designated Themed Street Trees

Table 4 Plan-Level Climate Action Plan Consistency Analysis for the Southwest Village Specific Plan	
Policy Language	Consistency Discussion
• Conduct a new Urban Tree Canopy assessment utilizing light detection and ranging (LiDAR) technology to identify areas in need of additional tree canopy. • Increase tree planting in Communities of Concern by identifying city lands/spaces that need trees. • Develop a plan to increase permeable areas for new trees and restore spaces that have been paved, focused in Communities of Concern. • Support expansion of urban tree canopy in parks and along active transportation network. Prioritize implementation in Communities of Concern. • Develop policies that encourage and incentivize developers, homeowner associations, and other organizations to preserve, maintain and plant trees. • Reform, streamline, and expand the No Fee Street Tree program to remove barriers that exist which detour or prohibit participation by residents within Communities of Concern. • Protect and maintain all healthy City trees that have minimal conflicts to existing and future infrastructure, by use of policy, code, public outreach and code enforcement. Supporting Actions • Amend the Land Development Code to increase landscape and parking lot tree planting requirements. • Streamline permitting for tree planting, dedicate resources to planting in nontraditional street tree locations, and provide reduced fees or fee waivers in Communities of Concern. • Revise Council Policies and Municipal Codes to strengthen tree protection and enhance tree planting efforts.	along all public roadways, as identified for each roadway type in Sections 4.5.1 through 4.5.10. Each roadway includes specifications for Themed Street trees in Chapter 4.0 of the Specific Plan. The Specific Plan includes a landscape plant palette as Appendix A to the Specific Plan. Numerous trees in various sizes are identified for neighborhoods, streetscapes, parks, interior slopes, and trailheads. All trees will be a minimum 36 inch wide box size. Various species, mature height and spread are identified to allow for appropriate sizing depending on parkway widths. Additionally, all future development would be required to comply with the City's CAP Consistency Regulations which address tree planting requirements.

Table 4 Plan-Level Climate Action Plan Consistency Analysis for the Southwest Village Specific Plan	
Policy Language	Consistency Discussion
• Increase irrigation for trees in Parks and in Street rights-of-way • Implement a citywide protocol for tracking planted, removed and maintained street trees. • Explore allocating revenue from tree removal fines, including from the placement of utility equipment located in the right of way, and fees to fund the planting of new trees. • Expand volunteer programs and partnerships with community organizations to plant and maintain trees. • Support the creation of new urban green space along freeways and city right of way. • Ensure the diversification of tree species, including using native tree and shrub species and/or species that are adapted to higher temperatures and require less water. • As established in the Energy Cooperation Agreement with the City and SDG&E, implement the Right Tree, Right Place program (or successor programs), identify additional tree planting locations, assist with tree species ideas, and provide technical support through SDG&E's arborists. • Monitor and report on SDG&E's plans to supplant the City's efforts with direct in-community charitable support for planting up to 2,500 trees in the city over 10 years. • Perform proper tree maintenance and tree removal to promote a healthy urban forest and safety of trees in public spaces. • Redesign hardscape infrastructure around existing City trees when possible in order to increase large tree canopy cover.	

Table 4 Plan-Level Climate Action Plan Consistency Analysis for the Southwest Village Specific Plan	
Policy Language	Consistency Discussion
Measure 5.3 Local Water Supply Expand awareness of the City's Rainwater Harvesting Rebates and Grass Replacement Rebates programs to increase participation in the programs and facilitate accessibility to residents across the City, prioritizing those within Communities of Concern and areas that have had historically lower participation in the programs. • Advance undergrounding of utilities to provide a means to reduce energy use, increase green space preservation, sustainably process and store water and wastes, securely and efficiently site critical infrastructure, prevent and reverse degradation of the urban environment, and enhance quality of life. • Maximize planning and implementation of green infrastructure at watershed scale and site specific with focused stakeholder engagement efforts in Communities of Concern. • Investigate opportunities to capture and reuse rainwater. • Implement Waterways Restoration projects. • Increase opportunities for stormwater harvesting by evaluating new harvesting methodology to determine viability. • Amend building code regulations to require a percentage of all non-roof (e.g., hardscape) surfaces around new buildings meet certain criteria to reduce urban heat island effect. • Install cool pavement material on City parking lots and in the public right-of-way, prioritizing Communities of Concern, to increase building energy efficiency and reduce urban heat island effect.	Not applicable. The City is responsible for rebate programs, local water supply, City parking lots, and associated regulations. Implementation of the Specific Plan would not prevent City implementation of programs to increase local water supply. Additionally, the Specific Plan incorporates significant green space preservation and would be constructed with the latest building codes which would ensure building energy and water efficiency within a Community of Concern.

Table 4 Plan-Level Climate Action Plan Consistency Analysis for the Southwest Village Specific Plan	
Policy Language	Consistency Discussion
Strategy 6: Emerging Climate Actions **This strategy will help the City thrive in the face of the impacts of climate change through a greater focus on the greening of our City, starting with our Communities of Concern. It also includes targets for the restoration of salt marshland for sequestration and increasing our local water supply through Pure Water San Diego.**	
Measure 6.1: Explore further opportunities to achieve net zero GHG emissions Supporting Actions • Explore policies and incentive programs to electrify construction equipment • Build programs and partnerships to recognize and incentivize business practices that align and implement the CAP strategies and measures. • Identify opportunities to improve city processes to facilitate faster deployment of technologies and practices in San Diego. • Investigate advanced air quality control systems, including GHG removal technologies and criteria pollutant control technologies. • Exploring the use of GHG emission offsets which can include techniques such as increasing carbon sequestration in soils, forests and farmland, purchasing clean electricity credits from neighboring states, or through emerging technological approaches such as the direct capture and removal of carbon from the atmosphere. • Participate in research around regional and/or local benefitting offset programs that ensure the benefits of investments are prioritized in the City's Communities of Concern. • Continue to engage on the development of research and data around the sequestration potential of various types of natural spaces	Not applicable. The City is responsible for programs, regulations, and policies related to achieving net zero. The Specific Plan buildout would occur in phases. Each development phase would be required to comply with the latest City regulations in effect at the time of building permits including any future regulations that are enacted to achieve net zero emissions. The project would not conflict with this measure as it would not prevent the City from exploring future opportunities to achieve net zero emissions.

Table 4 Plan-Level Climate Action Plan Consistency Analysis for the Southwest Village Specific Plan	
Policy Language	Consistency Discussion
including blue carbon sequestration, more specifically develop a citywide sequestration standard for wetlands restoration. • Support partners such as tribal governments and universities to restore salt marshes and wetlands ecosystems for sequestration. • As it pertains to GHG avoidance, the City's CAP Implementation Plan will focus and prioritize the core benefit of air quality to support the shared regional efforts to address nonattainment and improve air quality equitably. • Advocate for APCD to develop CERP-like plans in all communities. • Support the regional efforts to address nonattainment, toxic air contaminants in Communities of Concern.	

5.2 Project-level Analysis

As detailed in Section 4.2, significance is determined through (a.) land use consistency and (b.) project compliance with the City's Greenhouse Gas regulations set forth in SDMC Chapter 14, Article 3, Division 14. Each of these are discussed in the subsections that follow.

5.2.1 Land Use Consistency

The Specific Plan project is consistent with the General Plan and OMCP as detailed in Table 4. The OMCP identified generalized land uses and densities that would need to be formalized and defined through a Specific Plan process. The project includes both a Community Plan Amendment and a rezone to establish the Specific Plan and base zones. The OMCP Vision Map (OMCP Figure 1-2) identifies the Southwest Specific Plan as a Village Opportunity area that would contain a mix of local commercial, office, and multi-family residential uses around a village center designed to encourage pedestrian-oriented design and encourage transit ridership. Section 2.1 of the OMCP addresses the implementation of the Specific Plan Areas and provides a policy framework that the Specific Plan area would be required to implement. Due to the lack of site-specific land uses and zoning in the VTM (and Specific Plan) area, the CAP assumptions were been based on the generalized development assumptions contained in the OMCP which assumes the Southwest Village would include 1,400 single-family units and 4,480 multi-family units for a total of 5,880 units supporting an anticipated build-out population of 21,028 people (OMCP Table 2-5). As the proposed Specific Plan maximum residential density is 5,170 residential units, the VTM would be consistent with or less than the GHG emission generation assumptions used to develop the CAP.

The VTM would allow for residential development of up to 920 units, including 142 multi-family detached (under 20 dwelling units per acre), 498 multi-family attached units (under 20 dwelling units per acre), and 280 multi-family attached units (over 20 dwelling units per acre) which would be consistent with or less than the assumptions used in the development of the CAP. The project-level supporting infrastructure would include the construction of Beyer Boulevard and Caliente Avenue along with water and sewer infrastructure improvements. The project-level component also includes Phase 2 rough grading areas to provide balanced grading, drainage outfalls, a pump station/sewer lift station, and trails. These project-level components would support the development of the VTM and would also be consistent with or less than the assumptions used in the development of the CAP.

5.2.2 CAP Consistency Regulations

The first step in determining project consistency with the CAP regulations is confirming which aspects of the project are subject to the CAP Consistency Regulations. In general, it is clear that the CAP regulations apply to the VTM; however, implementation of the VTM includes a major extension of Beyer Boulevard, a City Mobility Element roadway. The proposed Beyer Boulevard extension would be a publicly maintained roadway.

The CAP regulations apply to "development on a premises" and the City LDC defines premises as "an area of land with its structures that, because of its unity of use, is regarded as the smallest conveyable unit". For purposes of the project, all portions of the VTM located within the Specific Plan

boundary is considered the "premises", as the Specific Plan defines the development area and includes all land that would be adjacent to structures. In contrast, the extension of Beyer Boulevard that extends west of the Specific Plan area would be adjacent to no structures and is planned to be owned and maintained by the City.

Notwithstanding that Beyer Boulevard west of the Specific Plan area is not subject to the CAP Consistency Regulations, the Beyer Boulevard design in this location incorporates substantial trees to offer shading consistent with the intent of the CAP Consistency Regulations. Pedestrian amenities for Beyer Boulevard west of the Specific Plan would be determined in coordination with the City based on the needs and constraints associated with this portion of the road.

All aspects of the VTM located within the Specific Plan have been designed to demonstrate consistency with the City's CAP Consistency Regulations. Required pedestrian amenities along public streets have been noted on the project landscape plans. Additionally, tree planting and shading requirements have been detailed on the project landscape plans. Bicycle parking is provided within individual garages which has access to electrical outlets for charging. No other public bicycle parking is required, therefore no additional bicycle charging infrastructure is required or provided. As detailed on the project plans, the VTM would be consistent with the CAP Consistency Regulations. Accordingly, unlike the significant and unavoidable impacts identified in the OMCP FEIR, impacts related to GHG emissions would be less than significant.

6.0 Conclusions

6.1 Program-level Analysis

OMCP FEIR identifies Mitigation Framework GHG-1 and GHG-2. However, as discussed in Section 3.3.3.2, the threshold identified in GHG-1 and GHG-2 has been updated consistent with the 2022 Significance Determination Thresholds and, therefore, GHG-1 and GHG-2 do not apply to the project. Program-level GHG impacts are assessed by determining consistency with the City's CAP. As detailed in Section 5.1, the Specific Plan would be consistent with the City's CAP and key General Plan policies that relate to GHG emissions. The proposed land uses and Specific Plan policies and design standards would promote the use of public transit, biking, and walking, to support reductions in regional VMT by reducing the need to drive a motor vehicle and shortening vehicle trip lengths. As a result, unlike the significant and unavoidable impacts identified in the OMCP FEIR, GHG impacts resulting from the Program-level areas would be less than significant.

6.2 Project-level Analysis

As with the program-level analysis, project-level GHG impacts are assessed by determining consistency with the City's CAP via a two-step analysis. As detailed in Section 5.2, implementation of the VTM and all project-level components would be consistent with the land use assumptions used in development of the CAP and would comply with the City's CAP Consistency Regulations including requirements for tree plantings, pedestrian amenities, and bicycle charging infrastructure. Therefore, unlike the significant and unavoidable impacts identified in the OMCP FEIR, impacts associated with GHG emissions for the project-level components would be less than significant.

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ATTACHMENT 1

Climate Action Plan Consistency for Plan- and Policy-level Documents and Public Infrastructure Projects

THE CITY OF SAN DIEGO

M E M O R A N D U M

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,

Rebecca Malone

Rebecca Malone
Environmental Policy Program Manager, Planning Department

RM/rm

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