



## EIR Considerations

### Executive Summary

The Planning Department claims that TPAs would not result in new or more severe significant impacts over what was previously analyzed in the Final PEIR for Complete Communities, the Addendum to the General Plan PEIR for the Housing Element Update, the Final PEIR or the Addendum to the CAP PEIR for the CAP Update. We disagree for the reasons set forth below.

**Land isn't fungible** – You can't swap one acre for another. For example, if the SDA acres are higher fire risk or more flood-prone than the TPA acres, the environmental impacts change. If they are farther from transit or of different topography resulting in different mobility choices, the impacts change.

Further, acreages reported by the Planning Department aren't accurate because they don't reflect the "specific plans" added in January.

Introducing SDAs and 7,533 plus new acres means you need new EIRs/PEIRs – for Complete Communities, for the Climate Action Plan and for the ADU code because its negative declaration was applied under the false pretense of simply "executing state code."

### COMPLETE COMMUNITIES (CC):

The 2020 Complete Communities PEIR couldn't address SDAs or the 913 acres of CC eligible acres they add because SDAs didn't exist then.

No one knew in 2020 that projects that were zoned for 52 units would be approved for 261 units (a 400+% increase above zoned allowances).

The 913 acres isn't even accurate because it doesn't include the specific plans the Planning Department added to SDAs in January.

The Complete Communities PEIR doesn't reflect the newly upzoned/rezoned parcels now eligible for CC because of three new community plan updates.

### THE ACCESSORY DWELLING UNIT (ADU) CODE'S NEGATIVE ENVIRONMENTAL IMPACT DECLARATION IS INSUFFICIENT AND NO LONGER APPLICABLE:

The ADU code shouldn't have been "statutorily exempt from CEQA" because it went well beyond state code requirements.

No one knew in 2020 that there would be permits pending on single-family lots for 11 ADUs and on multi-family lots for 148 ADUs.

SDAs will add more than 6,603 acres eligible for bonus ADUs.

New information is available and circumstances have changed with the proposed SDA expansion making the negative declaration insufficient to determine the impacts of the bonus ADU code.

### CUMULATIVE IMPACTS OF SDA EXPANSION ON BONUS ADU PROGRAM AND COMPLETE COMMUNITIES MAKE AN EIR NECESSARY

SDA expansion of 7,533 plus acres beyond previous TPAs and fact that land is non-fungible indicate the need for an SDA EIR.

The recent ruling by Superior Court Judge Ronald Frazier regarding the Junipers in Rancho Penasquitos supports the need to study the cumulative impacts of enlarging overlapping eligible areas for Complete Communities and the ADU bonus program.

### SDAs DO NOT SUPPORT GOALS IN 2020 ADDENDUM TO THE GENERAL PLAN PEIR FOR THE HOUSING ELEMENT

Moving "transit-oriented" and affordable housing farther from transit is the opposite of the villages and walkable neighborhood goals of creating "compact, walkable, transit-oriented communities." The increased distance from transit for dense development will result in greater reliance on autos, increased GHG and VMT. These changes will have environmental impacts on congestion, traffic, air, etc.

### SDAs CONFLICT WITH CLIMATE ACTION PLAN (CAP) GOALS, MODE SHIFT TARGETS AND ASSUMPTIONS IN PEIRs

SDAs conflict with state and federal definitions of transit-oriented development (within ½ mile walking distance from transit). Those definitions are based on goals to reduce GHG and VMT.

97% of San Diegans walk to transit and 92% of them walk ½ mile/10 minutes or less.

By expanding SDAs beyond the ½ mile San Diegans are willing to walk to transit, SDAs will work against these CAP goals:

- Locating new homes near transit
- Compact mixed-use land development near transit
- Convenient access to high quality transit
- Providing concentrated areas located near transit

By moving new housing opportunities further away from transit, employment, shopping, etc., SDAs will result in increased auto usage, greenhouse gas emissions, vehicle miles traveled, etc. These impacts have not been evaluated by an EIR and must be to determine their impact on the environment.

### TPA CODE AND PROPOSED SDA CODE REFER TO DIFFERENT “MAJOR TRANSIT STOPS” DESPITE WHAT CITY CLAIMS

TPA Code refers to Transit Improvement Programs (TIP) with 4-5 year planning horizon.

SDA proposed code refers to Transit Improvement Program (TIP) or Regional Transit Plan (RTP) with 20-30 year planning horizon.

Planning Department claims: “Programs still apply in similar geographic areas using the same Major Transit Stops as the TPA.” If that is true, then the TPA is not consistent with City Code.

This also begs the question of whether the comparisons of acreage for TPAs and SDAs are accurate or based on incorrect TPA mapping.

## Conclusion

Taken together or independently, each of the points above substantiates the need for either a supplemental or subsequent EIR/PEIR before SDAs should be approved. Substantial changes to the Project/codes (Section 21166), substantial changes to the circumstances, and new information not previously available require further environmental review.

This doesn't even take into consideration the fact that it is premature to vote on SDAs because the information provided by the Planning Department is incomplete, especially, but not limited to, the acreage estimates.

## Detailed Comments

### **Complete Communities Housing Solutions 2020 EIR Insufficient; Final PEIR for Complete Communities: Housing Solutions and Mobility Choices (SCH No. 2019060003)**

The original May 2020 Complete Communities Housing Solutions (CCHS) PEIR could not sufficiently address the environmental impacts of expanding this code with the proposed Sustainable Development Area (SDA) as it did not consider the additional 913 acres that the SDA will expand into as SDAs were an unknown construct in 2020. Did the 2020 PEIR account for parcels zoned for 52 units to be developed with 261 units (an increase of over 400%) as in the case of the Quince Apartments at 301 Spruce Street? This project is located on a pristine canyon and the fire hazard is significant.

Further, these reported 913 incremental acres (presented 12/8/22) do not include the unknown additional acres that will be added to the SDA with the recent inclusion (1/12/23) of specific plans to the SDA code language. No new acreage metrics have been provided by the Planning Department since that code change was made, nor have these areas been added to the SDA maps or a complete list of the specific plans been provided to LU&H, the Council or the public.

Additionally, there have been three Community Plan updates passed since the Complete Communities PEIR was completed, upzoning new parcels to 20 units/acre or more and/or rezoning parcels from industrial to mixed-use, making them now eligible for Complete Communities when they previously were not. Cumulatively, these changes represent potentially significant environmental impacts that were unknown when the CCHS PEIR was conducted and completed in 2020.

Further, acres of land are non-fungible. Acknowledging that TPAs might expand or change in the future (as the PEIR did) does not account for the potential differences in environmental impact that those additional acres might have. As just one example, if an increased percentage of the added SDA acreage were in Very High Fire Hazard Severity Zones (VHFHSZs) or flood zones versus acres in the original TPA, that would represent a completely different environmental risk fact requiring assessment. The Planning Department has provided no such detailed analysis of the incremental or base acreage, nor do we have a full accounting of the incremental SDA acreage given the addition of specific plan code language.

Finally, while the CCHS PEIR did say that “TPA boundaries may shift or new TPAs may be added”, it never indicated that the use of TPAs would be abandoned entirely and a completely new construct would be adopted to determine where Complete Communities development would be permitted. There is also no mention in the PEIR of

a change in how distance to transit would be measured or a change in the absolute distance to transit, both of which have profound effects on environmental impacts. At no point did the Complete Communities PEIR provide any discussion whatsoever of Sustainable Development Areas (SDA).

Taken together or independently, each of the points above substantiates the need for either a supplemental or subsequent Complete Communities EIR before SDAs should be approved or applied to CCHS code. Substantial changes to the Project/code (Section 21166), substantial changes to the circumstances, and new information not previously available require further environmental review. This doesn't even take into consideration the fact that it is premature to vote on SDAs because the information provided by the Planning Department is incomplete, especially, but not limited to, the acreage estimates.

[https://www.sandiego.gov/sites/default/files/final\\_peir\\_for\\_complete\\_communities\\_housing\\_solutions\\_and\\_mobility\\_choices.pdf](https://www.sandiego.gov/sites/default/files/final_peir_for_complete_communities_housing_solutions_and_mobility_choices.pdf)

### **2020 Accessory Dwelling Unit (ADU) Code Negative Declaration Insufficient and No Longer Applicable:**

With regard to the ADU Code, no EIR was ever done based on the false premise that the adoption of the 2020 ADU Code amendments were "statutorily exempt to CEQA pursuant to CEQA Guidelines 15282(h), which includes the adoption of ordinances to implement the provisions of Sections 65852.1 and 65852.2 of the Government Code. Likewise, additional dwelling units would comply with policies in the update to the Housing Element of the General Plan. The proposed amendment would not result in new environmental effects or a substantial increase in the severity of previously identified significant effects beyond those covered by the 2020 Addendum to the 2008 General Plan EIR." Pg 88

Source: [https://www.sandiego.gov/sites/default/files/addendum\\_to\\_the\\_general\\_plan\\_peir\\_for\\_the\\_housing\\_element\\_update\\_2021-2029.pdf](https://www.sandiego.gov/sites/default/files/addendum_to_the_general_plan_peir_for_the_housing_element_update_2021-2029.pdf)

The reality is that the San Diego ADU Bonus Program went dramatically above and beyond the CA ADU code, which required single-family zoned parcels to allow one ADU and one JADU on each parcel and multi-family parcels to allow up to two detached ADUs in addition to conversions of existing non-livable spaces on the property. When the code was passed and considered "statutorily exempt," it could not have been known that the city would be receiving requests for building permits of up to 11 ADUs on single-family parcels and up to 148 ADUs on multi-family parcels, so the environmental impacts of development of this magnitude would not have been considered given the statement that the city was merely executing state code.

Further, the SDAs will now be adding 6,603 developable acres beyond those in the existing TPA. These reported 6,603 incremental acres (presented 12/8/22) do not include the unknown additional acres that will be added to the SDA with the recent inclusion (1/12/23) of specific plans to the SDA code language. No new acreage metrics have been provided by the Planning Department since that code change was made, nor have these areas been added to the SDA maps or a complete list of the existing specific plans been provided to LU&H, the Council or the public.

Together these changes represent “substantial changes” to “the project which will require major revisions of the previous [EIR or] ND due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.” We believe these substantial changes warrant an EIR on the current ADU code taking into consideration the SDA, should it pass.

### **Cumulative Impacts of SDA Expansion on Acreage Eligible for ADUs and Complete Communities Make an Environmental Impact Report Necessary**

Overall, the SDAs as proposed will expand 7,533 acres beyond the previous TPAs per the Planning Department. These reported 7,533 incremental acres (presented 12/8/22) do not include the unknown additional acres that will be added to the SDA with the recent inclusion (1/12/23) of specific plans to the SDA code language. No new acreage metrics have been provided by the Planning Department since that code change was made, nor have these areas been added to the SDA maps or a complete list of the existing specific plans been provided to LU&H, the Council or the public.

Under the pretense that it was simply an execution of CA ADU code, no EIR was ever done on the 2020 ADU Code (added 10/30/20) or its Bonus Program allowing unlimited ADUs up to the floor area ratio (FAR) on single-family and multi-family properties. It could not have been known at the time how many ADUs might be built on a single-parcel. Further, no consideration was given to the cumulative impact of the Complete Communities Housing Solutions Code (EIR published on 5/5/20, Code added on 12/9/20).

The City states that “programs still apply in similar geographic areas” (<https://www.sandiego.gov/sites/default/files/2022-ldc-planning-commission-powerpoint-102722.pdf>), but the Planning Department must recognize that acres of land are non-fungible. Acknowledging that TPAs might expand in the future does not account for the potential differences in environmental impact that those different acres might have. As an example, if an increased percentage of the added SDA acreage were in Very High Fire Hazard Severity Zones (VHFHSZs) or flood zones versus in the original TPA, that would represent a completely different environmental risk factor requiring assessment. The Planning Department has provided

no such analysis of the incremental acreage, nor do we have a full accounting of the incremental SDA acreage given the recent addition of specific plan code language.

The city must now consider the **cumulative environmental impact** of the expansion of SDAs by 7,533 acres beyond the TPA and its effect on the enlarged areas eligible for development under both the CCHS code and the ADU code (inclusive of the unknown specific plan expansions) and in light of the upzoning/rezoning in three community plan updates adopted since the CCHS code passage. Together, all of these changes represent “substantial changes” to “the project which will require major revisions of the previous EIR or ND due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.”

The significance of cumulative environmental impacts has recently been highlighted by Superior Court Judge Ronald Frazier in the case involving the Junipers in Rancho Penasquitos. This is not a situation where nearby plans are not complete because the SDA code, if passed, will simultaneously expand the geographic reach of both the Complete Communities and ADU Codes, both of which allow significant and impactful density in large areas of San Diego that were not previously subject to these developments. An EIR is necessary to address not only the environmental impact of expanding the SDA more than 7,533 acres beyond the confines of the current TPA, but also the combined impact of those properties that would be eligible for development under both Complete Communities and the ADU Bonus Program, which has now received requests for permits allowing up to 148 ADUs on a single parcel.

<https://www.sandiegouniontribune.com/news/politics/story/2023-02-07/junipers-rancho-penasquitos-impact-review-ruling>

#### Proposed Sustainable Development Area Code:

*Sustainable Development Area* means the area within a defined walking distance along a pedestrian path of travel from a *major transit stop* that is existing or planned, if the planned *major transit stop* is included in a **transportation improvement program or applicable regional transportation plan**, as follows: ...

There will obviously be a huge difference in the “major transit stops” used for mapping TPAs based on the TIP’s 4 to 5- year planning horizon and for mapping SDAs if they are using the RTP’s 20 to 30-year planning horizon. It is now unclear which major transit stop the Planning Department is using for the TPA map and the SDA map and if they are the same. Clarification is required and reported acreages may have to be corrected, in addition to the updates required by the specific plan code change.

**SDAs Are in Significant Conflict with Goals in 2008 General Plan EIR and Addendum to the General Plan PEIR for the Housing Element (Project No. 104495/SCH No. 2006091032) and Are a Significant Change Requiring an EIR**

SDAs do not support the goals established in the 2020 PEIR for the 2008 General Plan. SDAs work in direct conflict to creating “compact, walkable and transit-oriented communities” by moving so-called “transit-oriented” and affordable housing development farther away from transit – up to 1 mile walking distance. SANDAG research shows that 97% of transit users in the region walk to transit ([https://www.sandag.org/uploads/publicationid/publicationid\\_4868\\_32650.pdf](https://www.sandag.org/uploads/publicationid/publicationid_4868_32650.pdf)) and 92% of them walk 10 minutes/1/2 mile or less ([https://www.sandag.org/uploads/projectid/projectid\\_494\\_21412.pdf](https://www.sandag.org/uploads/projectid/projectid_494_21412.pdf)).

By moving new housing opportunities further away from transit, employment, shopping, etc., SDAs will result in increased auto usage, greenhouse gas emissions, vehicle miles traveled, etc. These impacts have not been evaluated by an EIR and must be to determine their impact on the environment. SDAs represent a significant increase in acreage beyond TPAs. The exact increase is unknown because the Planning Department has provided insufficient base data for TPAs and incomplete acreage metrics for SDAs at this time. Land acreage is non-fungible and as such new acreage must be evaluated in its own right and not merely as a percentage increase over previous acreage.

SDAs represents “New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete [or the ND was adopted], shows any of the following: (A) The project will have one or more significant effects not discussed in the previous EIR or ND.”<sup>[L]</sup><sub>[SEP]</sub>

Below is a list of goals and content from the Addendum to the General Plan PEIR for the Housing Element which the SDAs conflict with/work against.

**Goal 3: Provide New Affordable Housing:** “When households of all incomes throughout the City can **live near transit**, employment opportunities, schools, and resources to meet the needs of daily living, the City can achieve balanced communities and address broader goals such as the City of Villages strategy and climate action goals.”

**Land Use and Community Planning:** “increase housing supply and diversity through the development of **compact, mixed use villages near transit services**; encourage better links from homes to jobs and services; Policy HE-A.2 calls for community plans to be updated regularly to identify areas appropriate for increased infill, residential and mixed-use development and to encourage location- and resource-efficient development



**whereby housing is located near** employment, shopping, schools, recreation, **transit,** and walking/bicycling infrastructure.”

**Mobility Element:** “The Mobility Element contains policies that promote a balanced, multi-modal transportation network that gets us where we want to go and **minimizes environmental and neighborhood impacts....**

The Housing Element Update complements and advances the goals of the Mobility Element by working to improve transportation and land use coordination **to create more compact, walkable, and transit-oriented communities.** Policies such as HE-O.3 call for the provision of incentives for residential and mixed-use **development at major transit nodes, along transit corridors,** and in other appropriate locations for high-intensity housing development. The Housing Element Update also emphasizes the importance of locating affordable housing near transit through policies such as HE-I.12.”

**Conservation Element:** “Similarly, the Housing Element Update contains policies such as HE-O.2 which encourages the development of **new housing that relies on and supports transit use** and environmentally sustainable patterns of movement, and HE-O.5 which promotes the development of policies and programs that help achieve the California Climate Strategy and the City’s Climate Action Plan goals.”

**SDAs Are in Significant Conflict with Goals in the Final PEIR for the Climate Action Plan (Project No. 416603/SCH No. 2015021053) and Addendum to the Final PEIR for the Climate Action Plan Update (Project No. 416603/SCH [SEP] No. 2015021053) and Represent a Significant Change Requiring an EIR**

The Planning Department make highly questionable claims (below) and comes to the conclusion that replacing TPAs with SDAs would “not result in new or more severe significant impacts over what was previously analyzed in the Final PEIR for the CAP and the Addendum to the CAP PEIR for the CAP Update.” We disagree and will do so one point at a time.

### **Sheer Scope of Acreage Increases**

We cannot comment on the percentage increase in acres of SDA versus TPA because the Planning Department has not provided sufficient TPA base data, but overall, the increase of 7,533 acres previously not included in the TPA is significant and, as noted earlier, this amount does not include the addition of specific plan acreage that has not been updated.

**San Diegans Are Generally Unwilling to Walk Beyond ½ Mile to Transit, So SDAs Will Encourage Increased Auto Dependency, Congestion, Greenhouse Gases and Vehicle Miles Traveled**

SDAs do not support the mode shift goals established San Diego’s Climate Action Plan (CAP). SDAs work in direct conflict to CAP’s stated goals of creating:

- ***Compact mixed-use land development near transit***
- ***Convenient access to high quality transit***
- ***Locating new homes near transit***
- ***Providing concentrated areas located near transit***

Instead, SDAs move so-called “transit-oriented” and affordable housing development farther away from transit – up to 1 mile walking distance. SANDAG research shows that 97% of transit users in the region walk to transit ([https://www.sandag.org/uploads/publicationid/publicationid\\_4868\\_32650.pdf](https://www.sandag.org/uploads/publicationid/publicationid_4868_32650.pdf)) and 92% of them walk 10 minutes (½ mile) or less to access that transportation ([https://www.sandag.org/uploads/projectid/projectid\\_494\\_21412.pdf](https://www.sandag.org/uploads/projectid/projectid_494_21412.pdf)). Therefore, it is reasonable to assume that most of the people living in the dense housing SDAs will allow to be smeared between ½ mile and 1 mile from transit will be relying on cars to get them where they need to go, because they will not be near much of anything other than more housing. They will be in the heart of single-family neighborhoods without ready access to transit, employment, shopping, healthcare, etc. This is the opposite of the villages and walkable neighborhoods the Climate Action Plan purports to support.

The state of California and the Federal government define transit-oriented development as being within ½ mile walking distance of transit. They generally don’t fund TOD projects beyond that half mile. This is based on copious amounts of research indicating that ½ mile is the outer limit of how far people are willing to walk, often even less for buses.

Therefore, the dense development that SDAs will allow beyond ½ mile from transit is likely to result in significant increases in GHG and VMT, in direct conflict to San Diego’s CAP. For this reason, and because the SDA is new information, not previously available when the 2022 Addendum to the Final PEIR for the Climate Action Plan Update was completed, an EIR must be done for the SDA code to consider the environmental impacts of SDAs given the unknown impacts this expanded distance between dense housing and transit will have on GHG emissions and VMTs.

#### Statements and Conclusions Made by the Planning Department Without Substantiation:

*Replacing a 0.5-mile radius with an area within a 0.75- to 1.0-mile walking distance from a major transit stop would not result in new or more severe significant impacts over what was previously analyzed in the Final PEIR for the CAP and the Addendum to the CAP PEIR for the CAP Update. The proposed amendments are consistent with and fall within the scope of the implementation program identified in the CAP and CAP Update. Thus, the Project would not result*

*in new or more severe significant impacts over what was previously analyzed in the Final PEIR for the CAP and the Addendum to the CAP PEIR for the CAP Update.*

*Amendment 5, which would replace TPAs with SDAs, would be consistent overall with Strategy 3: Mobility and Land Use, and specifically with Measure 3.5: Climate-Focused Land Use. The Addendum to the CAP PEIR for the CAP Update determined that **compact mixed-use land development near transit** along with mobility features to encourage walking, biking, and other non-vehicular forms of travel would have similar impacts as those outlined in the Final PEIR for the 2015 CAP for **Measure 3.6: Implement Transit Oriented Development within Transit Priority Areas.***

*This new geographic designation is intended to align with the City's Climate Action Plan (CAP) goals to ensure that the City's home development incentive programs have **convenient access to high quality transit** and safe and enjoyable walking/rolling and biking options for moving around. **Locating new homes near transit** where people are more likely to have lower rates of vehicular travel is a key component identified in Strategy 3 of the City's CAP. Increased desirability to walk is a critical metric to achieve the number of people who travel by walking, rolling, biking or taking transit. Increased density and increased investments in active transportation and transit infrastructure are critical factors to achieving increased desirability to walk. Providing infrastructure investments needed to support this enhancement is significantly more efficient when the investments are serving greater densities (more people). **The SDA definition facilitates these outcomes by providing concentrated areas located near transit**, allowing for generally greater densities that can most efficiently be served by greater investments in walking, rolling, biking, and transit, continually increasing the amount of non-vehicular travel. Therefore, the GHG emissions reductions to be achieved through these actions is consistent with the Climate Action Plan, Strategy 3.*

Sources:

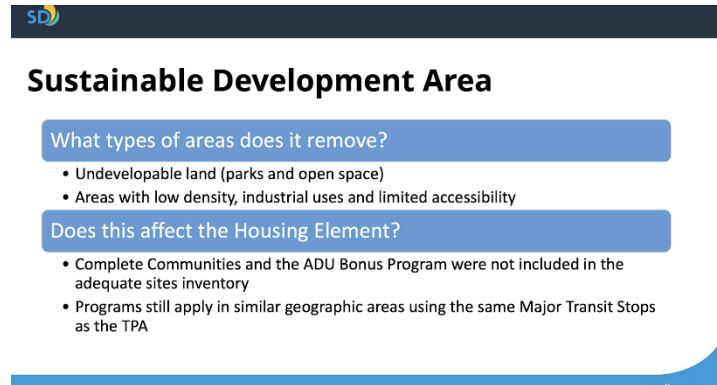
<https://sandiego.hylandcloud.com/211agendaonlinecouncil/Documents/ViewDocument/15162%20Memo%202022%20LDC%20Update.pdf.pdf?meetingId=5418&documentType=Agenda&itemId=218386&publishId=676814&isSection=false>

<https://www.sandiego.gov/sites/default/files/151123capfinalpeir.pdf>

[https://www.sandiego.gov/sites/default/files/final\\_addendum\\_to\\_the\\_cap\\_feir\\_for\\_the\\_climate\\_action\\_plan\\_update\\_6.21.22.pdf](https://www.sandiego.gov/sites/default/files/final_addendum_to_the_cap_feir_for_the_climate_action_plan_update_6.21.22.pdf)

## TPA Code and Proposed SDA Code Refer to Different “Major Transit Stops” Possibly Making the Current Acreage Estimates Inaccurate on that Basis

The Planning Department has falsely claimed that “Programs still apply in similar geographic areas using the same Major Transit Stops as the TPA.”



<https://www.sandiego.gov/sites/default/files/2022-ldc-planning-commission-powerpoint-102722.pdf>

If the same major transit stops are being used to create the TPA maps and the SDA map, the Planning Department may be using the wrong transit stops to create the TPA maps.

According to San Diego Municipal Code (below), the TPA is based on major transit stops in the “transportation improvement program” **TIP** (4 to 5- year planning horizon).

### San Diego Municipal Code:

*Transit priority area* means the area defined in California Public Resources Code Section 21099, as may be amended, or an area within one-half mile of a *major transit stop* that is existing or planned, if the planned *major transit stop* is scheduled to be completed within the planning horizon included in

a **Transportation Improvement**

**Program.** <https://docs.sandiego.gov/municode/MuniCodeChapter11/Ch11Art03Division01.pdf>

The proposed SDA code states it is to be based on major transit stops of the **TIP or the regional transportation plan (RTP)**, which has a 20 to 30-year planning horizon.

The Planning Department claims: “Programs still apply in similar geographic areas using the same Major Transit Stops as the TPA.” If that is true, then the TPA is not consistent with City Code.

This also begs the question of whether the comparisons of acreage for TPAs and SDAs are accurate or based on incorrect TPA maps.

## **Conclusion**

Taken together or independently, each of the points above substantiates the need for either a supplemental or subsequent EIR/PEIR before SDAs should be approved. Substantial changes to the Project/codes, substantial changes to the circumstances, and new information not previously available require further environmental review.

This doesn't even take into consideration the fact that it is premature to vote on SDAs because the information provided by the Planning Department is incomplete, especially, but not limited to, the acreage estimates.

## Relevant EIR Links for SDAs

### 2020 Addendum to the 2008 General Plan:

[https://www.sandiego.gov/sites/default/files/addendum\\_to\\_the\\_general\\_plan\\_peir\\_for\\_the\\_housing\\_element\\_update\\_2021-2029.pdf](https://www.sandiego.gov/sites/default/files/addendum_to_the_general_plan_peir_for_the_housing_element_update_2021-2029.pdf)

### Complete Communities:

[https://www.sandiego.gov/sites/default/files/final\\_peir\\_for\\_complete\\_communities\\_housing\\_solutions\\_and\\_mobility\\_choices.pdf](https://www.sandiego.gov/sites/default/files/final_peir_for_complete_communities_housing_solutions_and_mobility_choices.pdf)

### Climate Action Plan 2015 and Addendum 2022:

Final PEIR for the Climate Action Plan (Project No. 416603/SCH No. 2015021053) certified <sup>[1]</sup><sub>[SEP]</sub> by the San Diego City Council on December 15, 2015 (Resolution R-310176);  
<sup>[1]</sup><sub>[SEP]</sub>

2015: <https://www.sandiego.gov/sites/default/files/151123capfinalpeir.pdf>

Addendum to the Final PEIR for the Climate Action Plan Update (Project No. 416603/SCH <sup>[1]</sup><sub>[SEP]</sub>No. 2015021053) certified by the San Diego City Council on August 10, 2022 (Resolution R-314298).

2022: [https://www.sandiego.gov/sites/default/files/final\\_addendum\\_to\\_the\\_cap\\_feir\\_for\\_the\\_climate\\_action\\_plan\\_update\\_6.21.22.pdf](https://www.sandiego.gov/sites/default/files/final_addendum_to_the_cap_feir_for_the_climate_action_plan_update_6.21.22.pdf)