

City of Carlsbad
Addendum No. 1 to the Housing Element
Implementation and Public Safety
Element Update Supplemental
Environmental Impact Report for the
Climate Action Plan Update

prepared for

City of Carlsbad
1635 Faraday Avenue
Carlsbad, California 92008

prepared by

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Public Review Draft



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Executive Summary

The Project consists of an update to the City of Carlsbad’s Climate Action Plan (CAP Update). The city’s CAP Update outlines goals, strategies, and actions for reducing emissions and combating climate change. The current CAP, approved as part of the 2015 General Plan and amended in July 2020, ensures that Carlsbad does its part to contribute to the goals of AB 32 and its successor legislation, SB 32, to reduce its GHG emissions to 1990 levels by 2020, and to 40 percent below 1990 by 2030. The horizon year for the current CAP is 2035, corresponding with the buildout year of the 2015 General Plan.

The CAP Update contains strategies to reduce local greenhouse gas (GHG) emissions and streamline environmental review of future development projects in the city in accordance with the California Environmental Quality Act (CEQA) such that new development is designed and built following sustainable practices. This is the city’s second comprehensive update to the CAP, following the CAP Amendment No. 1 in July 2020 and the original CAP which was adopted in September 2015. CAP strategies reflect the goals and policies of the city’s General Plan, addressing topics such as increasing energy efficiency, expanding bicycle and pedestrian infrastructure, and achieving solid waste reduction.

The CAP Update establishes measures and actions to assist the City of Carlsbad in achieving its GHG emission reduction targets. The CAP Update includes measures organized into six sectors: water and wastewater, energy, waste diversion, transportation, off-road equipment, and carbon sequestration. These sectors serve as a way to organize GHG reduction measures and indicate the focus areas of the associated measures. Within each measure there are one or more actions that define activities, programs, policies, or projects that the city government will implement or support to achieve CAP Update goals.

In considering the potential environmental impacts of the CAP Update, the city has determined that the EIR certified for the 2015 General Plan update (General Plan & Climate Action Plan Environmental Impact Report, State Clearinghouse Number 2011011004, dated June 2015) and SEIR certified for the 2023 Housing Element Implementation and Public Safety Element Update (Housing Element Implementation and Public Safety Element Update Supplemental Environmental Impact Report, State Clearinghouse Number 2022090339, dated July 2023) are of continuing informational value. Further, the city has determined that the potential environmental impacts (both direct and indirect impacts) of the CAP Update are within the scope of the previously certified CEQA documents, and that none of the conditions requiring subsequent or supplemental environmental review under CEQA Guidelines section 15162 exists. Based on the information and analysis provided below, the city has determined that only minor or technical changes to the previously certified EIRs are necessary and that preparation of an Addendum pursuant to CEQA Guidelines section 15164 is appropriate. This Addendum was prepared as a first-tier CEQA document to “adequately address” the direct and indirect physical environmental effects of CAP Update implementation, including implementation ordinances, so the city can focus analysis in second-tier documents and implementation actions on issues specific to later projects. Agencies can adopt General Plan or zoning policies, and apply those policies to specific projects that are consistent with the General Plan or zoning ordinance (Public Resources Code section 21083.3). Under such circumstances, if an impact is not peculiar to the project, then issues addressed by those policies are statutorily exempt from further CEQA review. Based on the general nature of its measures and actions, the CAP Update is analyzed herein to determine whether it could cause a direct or reasonably foreseeable indirect change in the environment.

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1 Introduction and Project Summary

Project Title

Addendum No. 1 to the Housing Element Implementation and Public Safety Element Update Supplemental Environmental Impact Report (SEIR) for the Climate Action Plan Update (the “Project” which is also referred to herein as the “CAP Update”)

Lead Agency Name and Address

City of Carlsbad
1635 Faraday Avenue
Carlsbad, California 92008

Contact Person and Phone Number

Katie Hentrich, Senior Program Manager, (442) 339-2623

Project Location

The City of Carlsbad encompasses approximately 39 square miles of land in northwest San Diego County and is surrounded by Oceanside to the north, Vista, San Marcos, and unincorporated areas of San Diego County to the east, Encinitas to the south, and the Pacific Ocean to the west. Along Carlsbad’s northern edge, urban development abuts Highway 78, with the roadway and Buena Vista Lagoon acting as a boundary between Carlsbad and Oceanside. Similarly, Bat Iquitos Lagoon, along the city’s southern edge, acts as a boundary between Carlsbad and Encinitas. To the east, boundaries are less distinct, as a mix of hillsides and urban development are adjacent to Vista, San Marcos, and unincorporated County lands. The CAP Update planning boundary is the Carlsbad city limits, which is depicted on Figure 1.

Project Sponsor’s Name and Address

City of Carlsbad
1635 Faraday Avenue
Carlsbad, California 92008

City of Carlsbad
Climate Action Plan Update

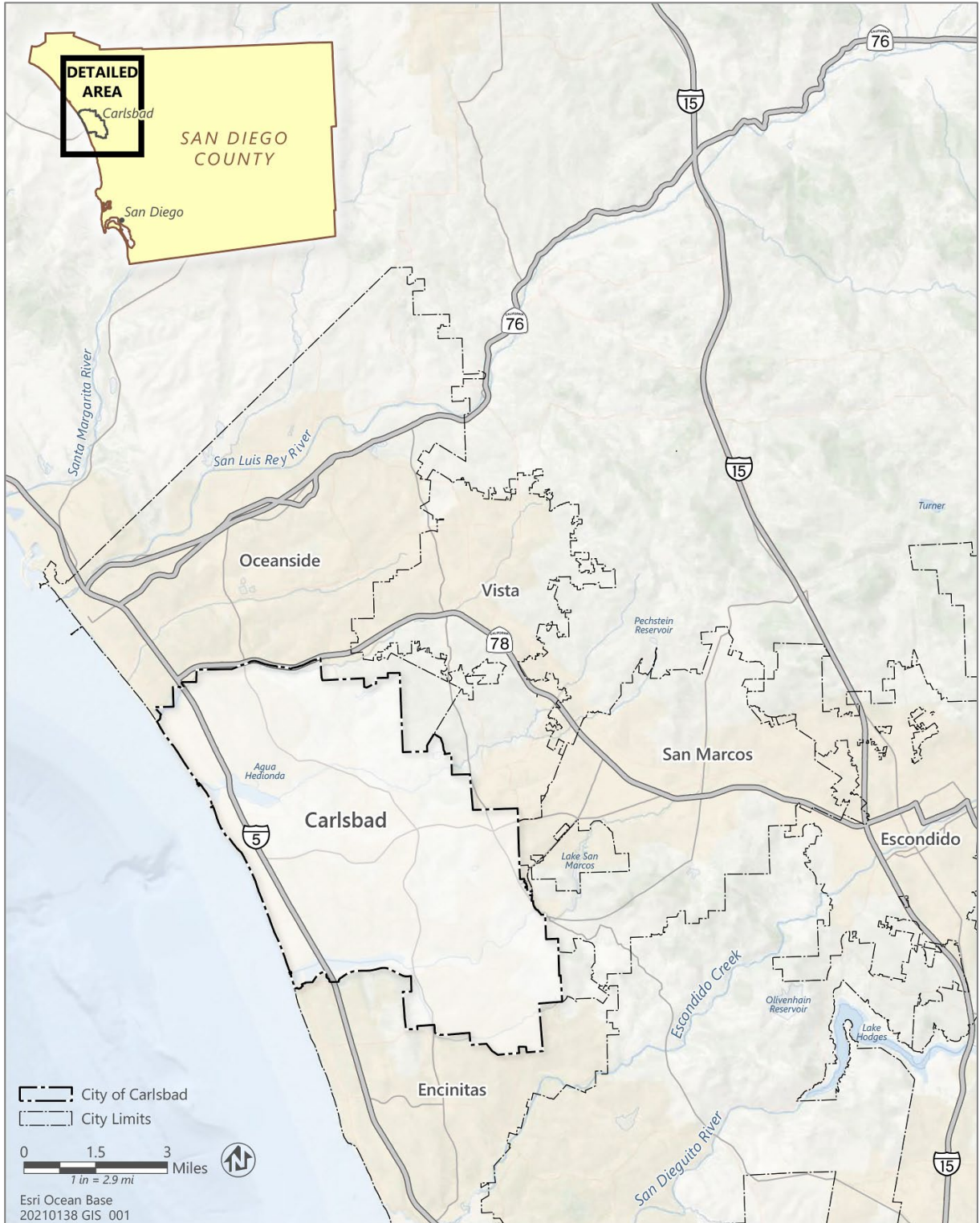


Figure 1 Regional Location and Project Vicinity

Project Description

The City of Carlsbad (City) strives to reduce its contribution to climate change through policy frameworks that pursue the community's goal of promoting a sustainable environment. The Climate Action Plan Update (CAP Update) serves to continue and elevate this policy framework by realigning its climate action policies with the most recent technological advancements, best practices, and State legislation. The CAP Update is organized into the following chapters:

- **Chapter 1, Introduction.** The introduction provides an overview of the effects of global climate change, describes the extensive and targeted outreach to engage community members to ensure that the planning process is inclusive and representative of various needs and viewpoints, and provides background for the city's climate action planning process.
- **Chapter 2, Greenhouse Gas Emissions Inventory, Forecasts, and Targets.** This chapter inventories the city's GHG emissions to demonstrate the city's overall contribution to climate change and the contribution of individual GHG emissions sources and forecasts how emissions are expected to change with future growth. This chapter presents the technical basis for the CAP Update, and sets Carlsbad-specific GHG reduction targets for 2035 and 2045 that align with State legislation.
- **Chapter 3, Greenhouse Gas Reduction Strategies and Measures.** This chapter presents six strategies and 25 measures that will reduce GHG emissions and build resilience to climate impacts in the community (i.e., GHG reduction strategies). The strategies are organized into six sectors: water and wastewater, energy, waste diversion, transportation, off-road equipment, and carbon sequestration.
- **Chapter 4, Implementation and Monitoring.** Building off the information in Chapter 3, this chapter outlines the process by which the city will implement CAP Update strategies and measures, and how progress will be monitored over time to ensure the CAP Update is effective in reducing emissions.

The CAP Update contains strategies to reduce local greenhouse gas (GHG) emissions and streamline environmental review of future development projects in the city in accordance with the California Environmental Quality Act (CEQA) such that new development is designed and built following sustainable practices. The CAP Update is the city's second comprehensive update to the CAP, following the CAP Amendment No. 1 in July 2020 and the original CAP adopted in September 2015 as part of the 2015 General Plan. CAP strategies reflect the goals and policies of the city's General Plan, addressing topics such as increasing energy efficiency, expanding bicycle and pedestrian infrastructure, and achieving solid waste reduction.

The CAP Update establishes measures and actions that would reduce GHG emissions in Carlsbad to levels that achieve its GHG reduction targets, which are aligned with the State's GHG reduction goals. The city's 2035 target requires GHG emissions to be reduced 50 percent below 2016 levels (aligned with and extrapolated from SB 32) and reduced to 85 percent below 2016 levels by 2045 (aligned with AB 1279). The CAP Update measures and actions are identified in Table 1. The measures and actions meet the city's GHG reduction targets.

The CAP Update meets the requirements for a qualified plan for the reduction of greenhouse gas emissions under State CEQA Guidelines Section 15183. for use in cumulative impact analysis pertaining to development projects. This Addendum No. 1 is intended to be used for future project-specific GHG emissions analyses by providing the appropriate level of environmental review to allow for future projects to tier from and streamline their analysis of GHG emissions pursuant to CEQA Guidelines

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Section 15183.5(b)(2), unless otherwise determined to be cumulatively considerable. CEQA provides a variety of devices available to streamline the environmental review process and avoid redundancy.

This Addendum No. 1 was also prepared to function as a first-tier CEQA document that would “adequately address” the direct and indirect physical environmental effects of GHG reduction measures including implementation ordinances so that city can focus the analysis in its second-tier documents and implementation actions solely on the issues specific to the later project. Pursuant to Public Resources Code section 21083.3, agencies can adopt General Plan or zoning policies, and apply those policies to specific projects that are consistent with the General Plan or zoning ordinance. Under such circumstances, if the impact at issue is not peculiar to the parcel or project, then the particular issues addressed by those policies are statutorily exempt from further CEQA review. Based on the “general nature” of the proposed measures and actions, the CAP Update is analyzed herein as to determine whether the activity could cause a direct or reasonably foreseeable indirect change in the environment.

Table 1. Summary of CAP Update Measures and Actions

Transportation
Measure T-1: Traffic Calming & Optimization
<i>Primary Actions</i>
Action T-1.a: Continue optimizing traffic signals within the city, adjusting as needed as traffic volumes and conditions change, and coordinating along major corridors.
Action T-1.b: Install roundabouts or traffic circles when feasible, utilizing the city’s engineering standard for intersection control.
<i>Supportive Actions</i>
Action T-1.c: Leverage the Sustainable Mobility Plan and Intersection Control Evaluation engineering standards to determine the location of new roundabouts and traffic circles.
Measure T-2: Transportation Demand Management Program
<i>Primary Actions</i>
Action T-2.a: Continue implementing and enforcing existing TDM program and enforcing existing TDM ordinance (adopted 2019), mandating TDM improvements and strategies for non-residential development.
Action T-2.b: Update TDM ordinance to modify existing threshold for compliance (e.g., reducing average daily trips threshold) as well as streamlining of other reporting requirements, as appropriate, by 2045.
<i>Supportive Actions</i>
Action T-2.c: Continue surveying businesses, pursuant to the TDM ordinance, to monitor implementation and track compliance.
Action T-2.d: Update TDM strategies in the TDM program as new technology emerges.
Action T-2.e: Leverage Carlsbad Commuter and other city channels to educate commuters on alternative commute choices and resources available.
Measure T-3: Safe Routes to School
<i>Primary Actions</i>
Action T-3.a: Continue implementing a Safe Routes to School program to encourage walking and biking to school.
<i>Supportive Actions</i>
Action T-3.b: Leverage the city’s Sustainable Mobility Plan to determine location-specific improvements.
Action T-3.c: Seek funding to launch Safe Routes to Schools programs at additional school sites.

Table 1. Summary of CAP Update Measures and Actions

Action T-3.d: Leverage the Sustainable Mobility Plan to conduct Safe Routes to School-related education and outreach activities at schools throughout the city.

Measure T-4: Bikeway System Improvements

Primary Actions

Action T-4.a: Construct 7.9 added miles of Class I multi-use bike paths.

Action T-4.b: Improve 61.2 miles of Class II bike lanes to Class II buffered bike lanes.

Action T-4.c: Continue other bikeway system improvements, as available.

Supportive Actions

Action T-4.d: Leverage the city's Sustainable Mobility Plan to determine location of bikeway system improvements and secure bike parking and/or storage.

Action T-4.e: Explore launch of a local on-demand microtransit program, such as the City of Oceanside's program.

Action T-4.f: Evaluate the city's Supportive Bicycle Infrastructure, such as adding new bicycle parking at highly used coastal destinations, bike repair stations, and additional bike-related amenities.

Measure T-5: Pedestrian System Improvements

Primary Actions

Action T-5.a: Add 6.19 miles of sidewalk.

Supportive Actions

Action T-5.b: Utilize the city's Sustainable Mobility Plan to identify suitable locations for pedestrian system improvements, focusing on creating safer and more user-friendly infrastructure to facilitate ease of use for pedestrians.

Measure T-6: Local Transportation Improvements

Primary Actions

Action T-6.a: Explore local transportation improvements to provide sustainable on-demand, flexible fleet transit and first-mile last-mile solutions.

Action T-6.b: Leverage the Multimodal Transportation Impact Fee for implementation of local transportation improvements.

Supportive Actions

Action T-6.c: Leverage existing regional transportation plans (e.g., North County Comprehensive Multimodal Corridor Plan, SANDAG Regional Transportation Plan) to add or update improvements to the transportation system within Carlsbad

Action T-6.d: Coordinate with regional and local agencies and partners on influencing transportation improvements throughout the region and within Carlsbad.

Measure T-7: Municipal Transportation Demand Management

Primary Actions

Action T-7.a: Continue implementing existing Transportation Demand Management programs for eligible city staff.

Supportive Actions

Action T-7.b: Explore establishing new Transportation Demand Management programs for city staff, resulting in Transportation Demand Management plans for city facilities.

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Table 1. Summary of CAP Update Measures and Actions

Measure T-8: Increase Public Zero Emission Infrastructure
Primary Actions
Action T-8.a: Increase the number of zero emission miles traveled within the city by installing and incentivizing public zero emission vehicle and bicycle infrastructure.
Supportive Actions
Action T-8.b: Seek external funding and/or partnerships for installation of zero emission vehicle and bicycle infrastructure (e.g., Clean Energy Alliance customer programs).
Action T-8.c: Explore creation of incentive programs for new construction and existing buildings to install zero emission vehicle and bicycle infrastructure beyond building code requirements.
Action T-8.d: Continue education and outreach on zero emission vehicle options and rebates.
Action T-8.e: Update existing Electric Vehicle Siting Plan to incorporate additional sites for zero emission vehicle and bicycle infrastructure, as well as new technologies, expanded zero emission vehicle types, and best practices.
Action T-8.f: Explore employee purchase programs to encourage workplace charging for city staff.
Measure T-9: Zero Emission City Fleet
Primary Actions
Action T-9.a: Continue transition and expansion of the city’s zero emission fleet.
Action T-9.b: Install zero emission charging infrastructure to support fleet conversion and deployment needs.
Supportive Actions
Action T-9.c: Establish city fleet regulations for idling.
Action T-9.d: Plan for fleet conversion and deployment, including updates to technology, legislation, and other best practices.
Action T-9.e: Research technology options and purchase technology to sustain city fleet operations during emergencies.
Action T-9.f: Transition all passenger fleet vehicle purchases after FY 2022-23 to be electric vehicles, with the exception of public safety vehicle purchases, which will be electric where feasible.
Action T-9.g: Update city policies to encourage use of zero emission vehicles wherever feasible.
Measure T-10: Parking Management Strategies
Primary Actions
Action T-10.a: Reduce vehicle miles traveled per capita citywide through parking management strategies.
Supportive Actions
Action T-10.b: Implement and update city’s parking management strategies (e.g., Carlsbad Village, Barrio, and Beach Areas Parking Management Plan, Village and Barrio Master Plan) to encourage alternative modes of transportation throughout the city.
Energy
Measure E-1: Renewable Electricity at Municipal Facilities
Primary Actions
Action E-1.a: Increase percentage of renewable electricity purchased for existing city facilities and street and safety lighting to 100%.

Table 1. Summary of CAP Update Measures and Actions

Action E-1.b: Have 100% renewable electricity be the default for new city facilities and street and safety lighting.
Action E-1.c: Eliminate natural gas use at city facilities, where feasible.
Supportive Actions
Action E-1.d: Coordinate with the city's energy suppliers on the purchase of 100% renewable electricity (e.g., "Green Impact" level from Clean Energy Alliance).
Action E-1.e: Continue certifying city facilities in the Carlsbad Green Business Program.
Action E-1.f: Conduct analysis to determine best practices and technologies for eliminating natural gas use at city facilities.
Action E-1.g: Leverage local and regional partnerships and seek funding to support identified renewable electricity upgrades and elimination of natural gas use at city facilities.
Action E-1.h: Upgrade all street and safety lighting to more energy efficient options.
Measure E-2: Community Choice Energy
Primary Actions
Action E-2.a: Continue the participation in the Clean Energy Alliance (CEA) Community Choice Energy program.
Action E-2.b: Set 100% renewable electricity (e.g., CEA's "Green Impact") as the default option for CEA customers within the city.
Supportive Actions
Action E-2.c: Explore the purchase of renewable energy credits if CEA is not reaching its 2035 goal.
Action E-2.d: Support promotion of CEA's customer programs and encourage CEA customers to participate.
Measure E-3: Nonresidential Building Energy
Measure E-3.1: Nonresidential Building Energy Existing Reach Code
Primary Actions
Action E-3.1.a: Continue implementing existing building energy efficiency and water heater ordinances (adopted in 2019).
Supportive Actions
Action E-3.1.b: Analyze feasibility of eligible sites for renewable energy infrastructure across all city facilities, leveraging any pre-existing analyses that are applicable.
Action E-3.1.c: Seek grant funding for installation of renewable energy infrastructure at existing and new city facilities (e.g., solar, battery storage, microgrids).
Measure E-3.2: Nonresidential Building Energy – Updated Reach Code
Primary Actions
Action E-3.2.a: Update city's building code, or "reach code," to include updated energy performance-based requirements for new nonresidential buildings.
Supportive Actions
Action E-3.2.b: Leverage CEA and SDG&E customer programs, or other similar programs.
Action E-3.2.c: Explore pilot programs and incentives to educate businesses on energy efficiency and renewable energy options for new and existing buildings.
Measure E-3.3: Nonresidential Building Energy – Solar Carports

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Table 1. Summary of CAP Update Measures and Actions

Primary Actions

Action E-3.3.a: Construct “solar carports” (also known as installing solar panels over outdoor parking spaces) at eligible city-owned parking lots.

Supportive Actions

Action E-3.3.b: Conduct feasibility study for solar carport installation at city facilities to determine which are eligible and for what size of system.

Action E-3.3.c: Seek grant funding and leverage partnerships to install solar carports.

Measure E-4: Residential Building Energy

Measure E-4.1: Residential Building Energy – Existing Reach Code

Primary Actions

Action E-4.1.a: Continue implementing existing building energy efficiency and water heater ordinances (adopted in 2019).

Supportive Actions

Action E-4.1.b: Explore updating the Home Energy Score Assessment Pilot Program.

Action E-4.1.c: Leverage CEA and SDG&E customer programs, or other similar programs

Action E-4.1.d: Explore pilot programs and incentives to educate residents on energy efficiency and renewable energy options for new and existing buildings.

Measure E-4.2: Residential Building Energy – Updated Reach Code

Primary Actions

Action E-4.2.a: Update city’s building code, or “reach code,” to include updated energy performance-based requirements for new residential buildings.

Supportive Actions

Action E-4.2.b: Leverage CEA and SDG&E customer programs, or other similar programs.

Action E-4.2.c: Explore pilot programs and incentives to educate residents on energy efficiency and renewable energy options for new and existing buildings

Measure E-5: Building Energy Benchmarking

Primary Actions

Action E-5.a: Develop, adopt, and implement a building energy benchmarking ordinance.

Supportive Actions

Action E-5.b: Prepare a building stock analysis.

Action E-5.c: Explore options and best practices for requiring existing commercial and residential buildings of a certain size to submit energy data annually.

Action E-5.d: Conduct education and outreach to building owners and the public regarding new requirements.

Measure E-6: Decarbonize Existing Buildings

Primary Actions

Action E-6.a: Reduce energy usage and decarbonize existing residential buildings, particularly existing residential buildings not covered by any reach code requirements.

Supportive Actions

Action E-6.b: Explore updating the Home Energy Score Assessment Pilot Program.

Table 1. Summary of CAP Update Measures and Actions

Action E-6.c: Leverage CEA and SDG&E customer programs, or other similar programs.
Action E-6.d: Seek external funding to launch and/or leverage existing pilot programs and incentives to support existing building decarbonization (e.g., appliance exchange, weatherization, solar PV installation, battery storage)
Action E-6.e: Leverage building stock analysis (prepared for E-5) to target existing residential buildings.
Water and Wastewater
Measure W-1: Wastewater System Improvements
Primary Actions
Action W-1.a: Continue making improvements to the City of Carlsbad’s collection system, including but not limited to upgrading lift stations.
Supportive Actions
Action W-1.b: Explore system improvements based on SCADA Master Plan.
Measure W-2: Water System Improvements
Primary Actions
Action W-2.a: Continue making improvements to CMWD’s potable and recycled water systems, including but not limited to expanding water reuse, and using renewable energy to power facilities.
Supportive Actions
Action W-2.b: Continue to explore local water supply options and assess feasibility and cost to benefit ratio.
Action W-2.c: Assess feasibility and seek funding for renewable energy and/or storage at CMWD facilities.
Waste Diversion
Measure WD-1: Solid and Organic Waste Diversion
Primary Actions
Action WD-1.a: Reduce waste disposal to 4.2 pounds per person per day (or the equivalent of a 75% diversion rate) by 2035 and to 1.7 per person per day (or the equivalent of a 90% diversion rate) by 2045.
Action WD-1.b: Divert 75% organic waste by 2035 and 90% by 2045.
Supportive Actions
Action WD-1.c: Research ordinance for requirement of a percentage of disposal for organic waste.
Action WD-1.d: Encourage maximum organics diversion from local businesses.
Action WD-1.e: Establish a Construction & Demolition diversion program.
Action WD-1.f: Maximize edible food recovery.
Action WD-1.g: Establish a program for permitted haulers for proper diversion of all waste streams.
Action WD-1.h: Continue implementing existing Sustainable Materials Management systems and ordinances citywide, including at city facilities and events.
Action WD-1.i: Continue implementing existing compost and mulch giveaway programs; explore launching new giveaway programs that target specific users.
Action WD-1.j: Update the city’s sustainable purchasing policy to include regulatory requirements for sustainable procurement.
Action WD-1.k: Pursue vendor contracts to help implement diversion goals and monitor compliance.

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Table 1. Summary of CAP Update Measures and Actions

Off-Road Equipment
Measure OR-1: Convert Gas-Powered Leaf Blowers
<i>Primary Actions</i>
Action OR-1.a: Develop, adopt, and implement an ordinance prohibiting the use of gas-powered leaf blowers.
<i>Supportive Actions</i>
Action OR-1.b: Leverage existing State and regional resources to promote trade-in of existing gas-powered leaf blowers or other similar incentives.
Action OR-1.c: Conduct outreach regarding the new requirements.
Measure OR-2: Increase Renewable or Alternative Fuel Construction Equipment
<i>Primary Actions</i>
Action OR-2.a: Develop, adopt, and implement an ordinance requiring new developments and significant land-moving and construction projects to use electric-powered or alternatively-fueled construction equipment that reduces 50% of emissions from project construction activities.
<i>Supportive Actions</i>
Action OR-2.b: Exempt small residential and non-residential projects from this requirement.
Action OR-2.c: Conduct outreach regarding new requirements.
Action OR-2.d: Seek external funding and leverage existing resources to support conversion of medium and heavy duty vehicles.
Carbon Sequestration
Measure CS-1: Community Forest Management
<i>Primary Actions</i>
Action CS-1.a: Increase city’s tree inventory by continuing to implement the Community Forest Management Plan.
Action CS-1.b: To help sustain the city’s tree inventory, continue replacing trees at a 2:1 ratio.
Action CS-1.c: Conduct an inventory to assess urban canopy cover every five years.
<i>Supportive Actions</i>
Action CS-1.d: Explore additional locations for tree planting beyond what is included in the Community Forest Management Plan, with “right tree right space,” ongoing budget, and maintenance costs taken into consideration.
Action CS-1.e: Encourage eligible residents to take part in a free street tree planting assessment.

Source: City of Carlsbad 2024.

Note: The implementation actions under each GHG reduction measure have been categorized as “Primary” or “Supportive” to signify the degree in which an action affects the quantifiable GHG reductions that are expected to be achieved with implementation. Primary actions are implementation actions that drive quantifiable GHG reductions. Supportive actions provide additional support to the successful implementation of the measure and may also have associated GHG reductions that have not been quantified as part of the CAP Update.

The city has developed an update to its Climate Action Plan Consistency Review Checklist (CAP

Consistency Checklist), in conjunction with the CAP Update, to provide a streamlined review process for proposed new development projects that are subject to discretionary review and trigger environmental review pursuant to CEQA. New developments that are consistent with growth projections and applicable GHG reduction measures of the CAP Update are eligible for streamlining under State CEQA Guidelines Section 15183.5. The proposed CAP Consistency Checklist is discussed in more detail in Chapter 4 of the CAP update.

The CAP Update includes strategies, measures, and actions intended to reduce GHG emissions from six emissions sectors. To achieve reductions in GHG emissions, measures and actions within each sector are proposed to be implemented within specific timeframes. The strategies, measures, and actions are listed in full in Table 1. The strategies, measures, and actions describe the overall approach and detail the specific programs and actions that the city will carry out. This Addendum has been prepared to address the implementation of the CAP Update measures and actions that could result in reasonably foreseeable physical impacts to the environment. More focused CEQA analysis (focusing on specifics of individual implementing actions) may be required in the future.

Discretionary Actions

The CAP Update would require the following discretionary actions by the City Council:

- Approval of Addendum No. 1 to the Housing Element Implementation and Public Safety Element Update Supplemental Environmental Impact Report
- Adoption of the CAP Update

Location of Prior Environmental Document(s)

The location and custodian of the General Plan update EIR, and Housing Element Implementation and Public Safety Element Update SEIR are the City Clerk, City of Carlsbad, 1200 Carlsbad Village Drive, Carlsbad, CA. A copy of the previous environmental documents is also available online at the City of Carlsbad, Planning Department website:

<https://www.carlsbadca.gov/home/showpublisheddocument/14316/638248571137030000>

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2 Project Context

The following provides a history and timeline of the environmental documentation that has been prepared for the City of Carlsbad's CAP and Housing Element Implementation and Public Safety Element Update.

On September 22, 2015, the City of Carlsbad certified a final environmental impact report (EIR) for a comprehensive update to the General Plan and a Climate Action Plan (General Plan & Climate Action Plan Environmental Impact Report, State Clearinghouse Number 2011011004, dated June 2015) (City of Carlsbad 2015). The city's 2015 CAP was developed in response to AB 32, and the increasing severity of climate events. The 2015 CAP includes goals, policies, and actions for Carlsbad to reduce GHG emissions and address climate change through 2035. The certified EIR discussed the potential environmental impacts (both direct and indirect impacts) associated with future development allowed under the General Plan update and included a thorough analysis of the estimated build out of the city through the horizon year 2035. The EIR found that, with implementation of the policies and programs contained in the General Plan and recommended mitigation measures, all impacts (direct and indirect) associated with future development under the General Plan update would be less than significant, except impacts on Air Quality and Transportation which would be significant and unavoidable.

As statewide targets adjusted to limit global warming below 2 degrees Celsius, the city has adapted its CAP and GHG reduction targets accordingly. On July 14, 2020, the City Council approved CAP Amendment No. 1 to revise the GHG inventory and reduction targets and forecast, update reductions from existing measures and incorporate community choice energy as a new reduction measure. This was partially influenced by the publication of the 2017 California Air Resources Board (CARB) Climate Change Scoping Plan (Scoping Plan) and the 2018 San Diego Association of Governments (SANDAG) Regional Climate Action Planning Framework (ReCAP). Both documents included new guidance on calculating GHG reduction targets. The amended CAP contained a 2012 GHG inventory, requiring the recalculation of 2020 and 2035 emissions reduction targets and recalculation of the business-as-usual (BAU) forecast, State and federal emissions reductions, and local reductions needed to reach a 2017 Scoping Plan aligned target. The BAU forecast assumes no additional actions to reduce GHG emissions occur after 2012 (the updated baseline inventory year), providing an assessment of how Carlsbad's GHG emissions would change with future growth.

Addendum No. 1 to the 2015 General Plan Update and CAP EIR was prepared in May 2020 for updates to the certified CAP ("CAP Amendment No. 1") (City of Carlsbad 2020). CAP Amendment No. 1 included use of the 2012 GHG inventory, calculation of 2020 and 2035 targets using the 2012 GHG inventory and guidance from CARB's 2017 Climate Change Scoping Plan, the addition of Community Choice Energy (CCE) as a GHG reduction measure and recalculation of the CAP measures to reflect changes in State and federal policies and the changed electrical generation emissions factor associated with CCE. The Addendum concluded that CAP Amendment No. 1 did not constitute a substantial change in the project or circumstances involving significant environmental effects or a substantial increase in the severity of previously identified effects. The mitigation measures previously included and remaining in the CAP, and the CCE implementation measure remained feasible. Therefore, CAP Amendment No. 1 did not necessitate a subsequent EIR because it did not create any of the situations contained in State CEQA Guidelines Section 15162.

Climate Action Plan Update

The Housing Element Update for the General Plan was prepared in late 2020 and provided to the California Department of Housing and Community Development (HCD) for preliminary review. The Housing Element was analyzed under its own respective CEQA document, Addendum No. 2 to the 2015 General Plan EIR, which was approved by the City Council on April 6, 2021 (SCH#2011011004) (City of Carlsbad 2021). This Addendum found that, with implementation of mitigation measures, all impacts (direct and indirect) associated with the Housing Element did not identify any changes in the Project (2015 General Plan), changes in circumstance, and/or any new information of substantial importance that would cause significant effects to environmental resources. Addendum No. 2 determined that the 2015 General Plan EIR was of continuing informational value, the changes in the 2021 Housing Element Update were within the scope of that previously certified EIR, and none of the conditions requiring the preparation of subsequent or supplemental environmental review under CEQA Guidelines section 15162 existed.

On February 2, 2024, the City of Carlsbad certified a supplemental environmental impact report (SEIR) which consists of amendments to the Carlsbad General Plan, including the Land Use and Community Design Element and Public Safety Element, and amendments to Carlsbad Municipal Code Title 21, the Zoning Ordinance (Housing Element Implementation and Public Safety Element Update Supplemental Environmental Impact Report, State Clearinghouse Number 2022090339, dated July 2023) (City of Carlsbad 2024). The certified SEIR discussed the potential environmental impacts (both direct and indirect impacts) associated with the development of housing on 18 sites as part of the Housing Element implementation. The SEIR identified updates to the Carlsbad General Plan, specifically the Land Use and Community Design Element, to allow for this development. The Public Safety Element would also be updated to ensure consistency with State regulations. Updates to the Land Use and Community Design Element included the addition of two new residential land use designations (R-35 and R-40) for the accommodation of higher density residential development, establishment of revised minimum densities for some residential designations, miscellaneous, related changes to tables, text and policies, and changes to land use designations on multiple sites to accommodate the city's Regional Housing Needs Allocation (RHNA) share. Updates to the Public Safety Element included the addition of the requirements of new State legislation and the incorporation of new policies based on local and regional data. The SEIR found that, with implementation of mitigation measures, all impacts (direct and indirect) associated with the Housing Element Implementation and Public Safety Element Update would be less than significant, except impacts on Air Quality, GHG, Noise, and Transportation which would be significant and unavoidable.

In considering the potential environmental impacts of the CAP Update, the city has determined that the EIR certified for the 2015 General Plan update and SEIR certified for the 2024 Housing Element Implementation and Public Safety Element Update are of continuing informational value. The city also has determined that the potential environmental impacts (both direct and indirect impacts) of the CAP Update are within the scope of the previously certified EIR and SEIR and that none of the conditions requiring subsequent or supplemental environmental review under CEQA Guidelines section 15162 exists. Based on the information and analysis provided below, the city has determined that only minor or technical changes to the previously certified EIR are necessary and that that preparation of an Addendum pursuant to CEQA Guidelines section 15164 is appropriate.

3 Overview of the CEQA Guidelines

Section 15160 of the CEQA Guidelines explains that there are several mechanisms, and variations in environmental documents, that can be tailored to different situations and intended uses of environmental review. Specifically, Section 15160 states that the “...variations listed [including Subsequent EIRs, Supplemental EIRs, and Addendums] are not exclusive. Lead agencies may use other variations consistent with the Guidelines to meet the needs of other circumstances.” This provision allows Lead agencies to tailor the use of CEQA mechanisms (such as this Addendum) to fit the circumstances presented to the Lead agency by a project. Here, the city has opted to prepare an Addendum to assess the minor modifications of the Project that have transpired since preparation of the EIR.

Public Resources Code Section 21166 and California Environmental Quality Act (CEQA) Guidelines Sections 15162 and 15164 set forth the criteria for determining the appropriate additional environmental documentation, if any, to be completed when changes are proposed to a project that has a previously certified Environmental Impact Report (EIR). When considering the need for additional environmental review, the fundamental determination a lead agency must make is whether the previously certified EIR retains some informational value or whether changes in the project or circumstances have rendered it wholly irrelevant. If the previously certified EIR has continuing informational value, the lead agency then must determine whether the proposed changes in the Project require additional environmental review under Public Resources Code Section 21166 and CEQA Guidelines Section 15162.

CEQA Guidelines Section 15164 states that a lead agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary, but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred. CEQA Guidelines section 15162(a) states that no Subsequent or Supplemental EIR shall be prepared for a project with a certified EIR unless the lead agency determines, based on substantial evidence in the light of the whole record, one or more of the following:

1. Substantial changes are proposed in the project that will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
3. 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, shows any of the following:
 - A. The project will have one or more significant effects not discussed in the previous EIR.
 - B. Significant effects previously examined will be substantially more severe than shown in the previous EIR.
 - C. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative.

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- D. Mitigation measures or alternatives that are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

The analysis pursuant to Section 15162 demonstrates whether the lead agency can approve the activity as being within the scope of the existing certified EIR, that an addendum to the existing EIR would be appropriate, and no new environmental document, such as a new EIR, would be required. The addendum need not be circulated for public review but can be included in or attached to the final EIR, and the decision-making body shall consider the addendum with the final EIR prior to deciding on the project.

The City of Carlsbad has prepared this Addendum, pursuant to CEQA Guidelines Sections 15162 and 15164, to evaluate whether the Project’s environmental impacts are covered by and within the scope of the Housing Element Implementation and Public Safety Element Update Supplemental Environmental Impact Report (State Clearinghouse Number 2022090339, dated July 2023). The following Addendum details any changes in the Project, changes in circumstances under which the Project is undertaken, and/or “new information of substantial importance” that may cause one or more significant effects to environmental resources.

The responses herein substantiate and support the City of Carlsbad’s determination that the potential environmental impacts of the CAP Update measures and actions are within the scope of the Housing Element Implementation and Public Safety Element Update SEIR, do not require subsequent or supplemental environmental review under CEQA Guidelines Section 15162 and, in conjunction with the SEIR, preparation of an Addendum pursuant to CEQA Guidelines Section 15164 is appropriate.

4 Environmental Effects and Determinations

The subject areas checked below were determined to be new significant environmental effects or to be previously identified effects that have a substantial increase in severity either due to a change in Project, change in circumstances, or new information of substantial importance, as indicated by the checklist and discussion on the following pages.

■ NONE

- | | | |
|---|--|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Air Quality | <input type="checkbox"/> Biological Resources |
| <input type="checkbox"/> Energy, Greenhouse Gas Emissions, and Climate Change | <input type="checkbox"/> Geology, Soils, and Seismicity | <input type="checkbox"/> Hazards and Hazardous Materials, Airport Safety, and Wildfires |
| <input type="checkbox"/> Historical, Archaeological, and Paleontological Resources (includes Tribal Cultural Resources) | <input type="checkbox"/> Hydrology and Flooding /Water Quality | <input type="checkbox"/> Land Use Planning, Housing, and Population |
| <input type="checkbox"/> Noise | <input type="checkbox"/> Public Facilities and Services | <input type="checkbox"/> Utilities and Service Systems |
| <input type="checkbox"/> Transportation | <input type="checkbox"/> Agriculture & Forestry Resources | <input type="checkbox"/> Impacts Not Potentially Significant: Mineral Resources |

Determination

Based on this analysis, the 2024 Housing Element Implementation and Public Safety Element Update SEIR has continuing informational value and:

- Substantial changes are proposed in the project or there are substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previous EIR due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects. Or, there is “new information of substantial importance,” as that term is used in CEQA Guidelines Section 15162(a)(3). Therefore, a SUBSEQUENT or SUPPLEMENTAL EIR is required.
- No substantial changes are proposed in the project and there are no substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previous EIR due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects. Also, there is no “new information of substantial importance” as that term is used in CEQA Guidelines Section 15162(a)(3). Therefore, the preparation of an Addendum to the previously certified SEIR (City of Carlsbad, Housing Element Implementation and Public Safety Element Update Supplemental Environmental Impact Report (SEIR) (State Clearinghouse Number 2022090339, dated July 2023) is adequate and appropriate.

Signature: Eric Lardy Date: May 2, 2024

Printed Name: Eric Lardy Title: City Planner

5 Addendum Methodology

The city has previously prepared and certified an EIR for the 2015 General Plan, an Addendum for the CAP Amendment (2020), an Addendum for the Housing Element (2021), and a SEIR for the Housing Element Implementation and Public Safety Element Update (2024). Collectively, these CEQA reviews are known as the “Previous CEQA Documents.” No legal actions were filed challenging the Previous CEQA Documents and thus are presumed valid.

Since the adoption of the Previous CEQA Documents, there have been no substantial changes in the city’s policies that relate to actions in the CAP Update; neither has there been new information, or a change of circumstances which would invalidate the Previous CEQA Documents. In addition, the city adopted ordinances in 2019 that amended the Carlsbad Municipal Code related to energy efficiency, renewable energy, alternative water heating, electric vehicle charging infrastructure and transportation demand management, which further mitigate environmental impacts.

The CAP Update is a programmatic planning document which catalogues the priorities of the city for reducing energy use and greenhouse gas emissions to meet State reduction targets. The CAP Update does not approve or authorize a project that could potentially alter the environment. Rather, it outlines the need for future work to advance each of the separate measures and actions.

6 Addendum Evaluation

Aesthetics

SEIR Evaluation Criteria	SEIR Significance Conclusion	SEIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent SEIR Needed?					Project is within the Scope of the SEIR?
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?	Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15164(a) Occur?		
Would implementation of the CAP Update:								
a. Have a substantial adverse effect on a scenic vista?	Less than Significant	None	No	No	No	Yes	Yes	
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?	Less than Significant	None	No	No	No	Yes	Yes	

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SEIR Evaluation Criteria	SEIR Significance Conclusion	SEIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent SEIR Needed?					Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of the SEIR?
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
c. In non-urbanized areas, substantially degrade the exiting visual character or quality of public views of the site and its surroundings (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?		Less than Significant	None	No	No	No	Yes	Yes	
d. Create a new source of substantial light or glare that would adversely affect day- or nighttime views in the area?		Less than Significant	None	No	No	No	Yes	Yes	

Previous CEQA Analysis Aesthetics Findings

The 2024 SEIR identified less than significant impacts for scenic vistas (AES-1), scenic resources within scenic highways (AES-2), visual quality (AES-3), and light and glare (AES-4) (Section 4.1, Aesthetics).

Addendum Analysis

The implementation of the CAP Update measures and actions would result in short-term and long-term changes related to aesthetics as described below.

Construction activities associated with the implementation of the CAP Update, such as equipment use and staging of materials, would result in short-term, temporary changes to aesthetic conditions in the city. The types of construction activities associated with the CAP Update would vary depending on the type of CAP Update measure. For example, Measures T-1, T-4, T-5, T-8, and T-9 would involve removing existing pavement; repaving roadway surfaces; painting or restriping pavement; modifying curbs; laying concrete, and installing traffic signals, lighting, landscaping, street furniture, and other amenities. Some of these improvements, such as Measure E-3.3, W-1, and W-2, would require limited ground disturbance. Construction activities would be short-term and temporary, and would not involve equipment of substantial height, bulk, or massing that would have substantial adverse effects on existing scenic vistas, scenic resources, or visual quality. Because duration of these activities would be limited to relatively short periods, their temporary effects on aesthetic resources would not be substantial.

Construction activities would also incrementally increase sources of light and glare in the city, for example from outdoor lighting sources associated with construction of transportation improvements and glare from construction vehicles and equipment. Construction activities would generally occur during daytime hours and would comply with applicable lighting requirements including the City's Zoning Ordinance and Title 24 of the California Building Code that reduce light spillover. Furthermore, construction activities would be located in developed areas with existing sources of outdoor lighting and glare, characteristic of developed urban and suburban environments. Thus, the CAP Update would not create temporary new sources of substantial light or glare that would adversely affect day or nighttime views in the city.

Long-term changes resulting from implementation of CAP Update measures would include improvements at or near grade level of existing roadways, as well as minor changes to traffic intersections and walkways (through implementation of Measures T-1, T-4, T-5, T-8, and T-9), improvements to water and wastewater systems (Measures W-1 and W-2), and planting of trees (through implementation of Measure CS-1). Energy-related measures such as Measure E-3.3, which includes the construction of solar carports, would also result in changes to the aesthetic environment. Implementation of Measures T-1, T-4, T-5, T-8, and T-9 would also result in the installation of new sidewalks, new and upgraded bikeways and walkways along existing developed roadways and rights-of-way in the city, and the installation of roundabouts or control traffic within the intersections of existing developed roadways. The CAP Update would not result in new features of substantial height, bulk, or massing that would result in substantial long-term damage to scenic vistas, scenic resources, or visual quality. Additionally, the increase in planted trees and the development of new landscaping (Measure CS-1) would offer long-term visual improvement to the local surrounding area and would not result in a substantial effect to scenic vistas, scenic resources, or visual quality.

Transportation measures and actions included in the CAP Update would include improvements to the city's existing pedestrian, bicycle, and transit network that may introduce new short term light sources. In addition, installation of solar carports (Measure E-3.3) would introduce new sources of glare from sunlight reflecting off of solar photovoltaic panels.

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These types of improvements would comply with applicable lighting requirements including the city's Zoning Ordinance and Title 24 of the California Building Code that reduce light spillover. Improvements resulting from implementation of the CAP Update would be located in developed areas with existing sources of outdoor lighting and glare, characteristic of developed urban and suburban environments. Thus, the CAP Update would not create new long-term sources of substantial light or glare that would adversely affect day or nighttime views in the city.

Conclusion

There are no changes in circumstances or new information of substantial importance that would require major revisions to the 2024 SEIR or result in new significant effects or a substantial increase in the severity of previously identified effects related to aesthetics. The 2024 SEIR did not identify significant aesthetic impacts and did not identify mitigation measures. The CAP Update would not result in any new or substantially more severe significant impacts related to aesthetics.

Applicable Mitigation Measures from the SEIR

There are no mitigation measures from the 2024 SEIR identified to reduce impacts related to aesthetics.

Agriculture and Forestry Resources

SEIR Evaluation Criteria	SEIR Significance Conclusion	SEIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent SEIR Needed?					Project is within the Scope of the SEIR?
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?	Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162(a) Occur?	Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162(a) Occur?	
Would implementation of the CAP Update:								
a. Convert Prime Farmland, Unique Farmland, or Farmland of statewide Importance, as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?	No Impact	None	No	No	No	Yes	Yes	
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	No Impact	None	No	No	No	Yes	Yes	

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SEIR Evaluation Criteria	SEIR Significance Conclusion	SEIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent SEIR Needed?				Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of the SEIR?
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?		
c. Conflict with existing zoning for, or cause rezoning of, forest land, as defined in Public Resources Code Section 12220 (g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?		No Impact	None	No	No	No	Yes	Yes
d. Result in the loss of forest land or conversion of forest land to non-forest use?		No Impact	None	No	No	No	Yes	Yes
e. Involve other changes in the exiting environment which, due to their location or nature, could result in the conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?		No Impact	None	No	No	No	Yes	Yes

Previous CEQA Analysis Agriculture and Forestry Resources Findings

The 2024 SEIR identified no impacts for converting Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland); for conflicting with existing zoning for agricultural use or a Williamson Act contract or with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)); timberland (as defined by Public Resources Code Section 4526); or timberland zoned Timberland Production (as defined by Government Code Section 51104(g)); and for resulting in the loss of forest land or conversion of forest land to non-forest use; or involving other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use (Section 4.16.1, Agriculture and Forestry Resources).

Addendum Analysis

Implementation of the CAP Update would not result in the conversion of Important Farmland or forest land to urban or other uses. Measures and actions included in the CAP Update may include construction activities, such as equipment use and staging of materials; however, construction activities would occur in previously disturbed, developed areas not currently used for agricultural uses or under a Williamson Act contract. There are currently no Williamson Act contracts in the city and the CAP Update does not propose land use changes that would affect the status of any Williamson Act contracts (DOC 2024). Additionally, there are no areas in the city zoned as forest or timberland, therefore, implementation of the CAP Update would not conflict with existing zoning or cause rezoning any forest land, timberland, or timber land zoned for timberland production. Therefore, the CAP Update would not involve other changes in the exiting environment which, due to their location or nature, could result in the conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.

Conclusion

There are no changes in circumstances or new information of substantial importance that would require major revisions to the 2024 SEIR or result in new significant effects or a substantial increase in the severity of previously identified effects related to agriculture and forestry resources. The 2024 SEIR did not identify significant agriculture and forestry resources impacts and did not identify mitigation measures. The CAP Update would not result in any new or substantially more severe significant impacts related to agriculture and forestry resources.

Applicable Mitigation Measures from the SEIR

There are no mitigation measures from the 2024 SEIR identified to reduce impacts related to agriculture and forestry resources.

Air Quality

SEIR Evaluation Criteria	SEIR Significance Conclusion	SEIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent SEIR Needed?				Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162(a) Occur?	Project is within the Scope of the SEIR?
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?			
Would implementation of the CAP Update:								
a. Conflict with or obstruct implementation of the applicable air quality plan?	Less than Significant with Mitigation	MM AQ-1	No	No	No	Yes	Yes	
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or State ambient air quality standard?	Significant and Unavoidable	MM AQ-2	No	No	No	Yes	Yes	
c. Expose sensitive receptors to substantial pollutant concentrations?	Less than Significant with Mitigation	MM AQ-3 MM AQ-4	No	No	No	Yes	Yes	
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	Less than Significant	None	No	No	No	Yes	Yes	

Previous CEQA Analysis Air Quality Findings

The 2024 SEIR identified a less than significant impact related to a conflict with or obstruction of the San Diego Regional Air Quality Strategy or State Implementation Plan (AQ-1) with implementation of mitigation measure AQ-1. The 2024 SEIR identified that although mitigation measure AQ-2 would reduce operational emissions from future development, it would be speculative to quantify such emissions until details of the individual projects are known and concluded impacts to be significant and unavoidable (AQ-2). The 2024 SEIR identified a less than significant impact related to exposing offsite sensitive receptors to substantial pollution concentrations (AQ-3) with implementation of mitigation measure AQ-3 and mitigation measure AQ-4. The 2024 SEIR also identified a less than significant impact related to creating objectional odors (AQ-4) (Section 4.2, Air Quality).

Addendum Analysis

The implementation of the CAP Update measures and actions would result in short-term and long-term changes related to air quality as described below.

Construction activities associated with the implementation of the CAP Update, such as equipment use, construction of new facilities or retrofitting of existing facilities, would result in construction-related air quality emissions. The types of construction activities associated with the CAP Update would vary depending on the type of CAP Update measure. Examples of activities that would result from implementation of the CAP Update measures include construction of new EV charging stations, public zero emission vehicle and bicycle charging infrastructure, building efficiency retrofits, roundabouts or traffic circles, new and improved bicycle infrastructure, new solar carports, and water and wastewater system improvements (e.g., Measures T-1, T-2, T-3, T-4, T-5, T-8, T-9, E-3.3, W-1, and W-2). These construction activities would involve using construction equipment and vehicles to remove existing pavement; repave roadway surfaces; paint or restripe pavement; modify curbs; lay concrete, and install traffic signals, lighting, landscaping, street furniture, and other amenities. These construction activities would be completed by workers located in the city and surrounding areas in the San Diego region.

Construction activities resulting from implementation of the CAP Update would generate emissions of ROG, NO_x, PM₁₀, and PM_{2.5} associated with off-road equipment use (i.e. excavators, front loaders, pavers, dump trucks, cranes, and backhoes), material and equipment delivery trips, worker commute trips, and other miscellaneous activities. Construction activities would be relatively small in scale, occur intermittently in different locations throughout the city, last for only short periods of time, and would not require substantial relocation of construction workers from areas outside of the city and the San Diego region. The CAP Update includes measures that would reduce air pollutant emissions during construction activities. For example, measure OR-2 would increase the use of renewable and alternative fuel construction equipment, while Measure T-9 would establish city fleet regulations for idling, thus reducing construction vehicle idling time and further reducing construction related air pollutant emissions. Due to the non-intensive, sporadic, and dispersed nature of these construction activities, emissions of criteria air pollutants would not occur in concentrations which would exceed SDAPCD thresholds and would therefore be consistent with the goals of the San Diego Regional Air Quality Strategy or State Implementation Plan. Therefore, mitigation measure AQ-1 identified in the SEIR would not apply to the construction related air pollutant emissions of the CAP Update. Mitigation measure AQ-1 identified in the SEIR applies specifically to the construction impacts associated with housing development projects permitted under implementation of the Housing Element Update, and would therefore not apply to the CAP Update.

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The CAP Update includes several measures (T-4, T-5) that would reduce GHG and vehicle miles traveled (VMT) through the expansion of bicycle infrastructure, and increased connectivity of sidewalk networks. Although there would be a temporary, nominal amount of vehicle trips related to construction worker commute and equipment delivery associated with bike and sidewalk improvements and other construction activities resulting from CAP Update implementation, the CAP Update would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or State ambient air quality standard. Therefore, mitigation measure AQ-2 identified in the SEIR would not apply to the CAP Update.

Measures that would result in new zero emission vehicle and bicycle charging stations (T-8), roundabouts (T-1), improved bicycle infrastructure (T-4), solar carports (E-3.3) would result in minor criteria air pollutant and TAC emissions during construction. It is unlikely that these types of activities would be of the size, intensity, or duration to exceed SDAPCD thresholds of significance or to emit substantial TAC concentrations. Measure WD-1 would increase the diversion of solid and organic waste from landfills which could lead to increased haul truck trips to and from composting and recycling facilities; however, it is anticipated that these trips would displace the haul truck trips that would be diverted from the landfill. A substantial net increase in the number of haul truck trips and associated criteria air pollutant emissions within the city would not be anticipated. Furthermore, these haul truck trips would likely be infrequent and would not involve the trucks idling for extended periods of time near sensitive receptors. As such, implementation of the CAP Update would not expose off-site sensitive receptors to substantial pollution concentrations. Therefore, mitigation measures AQ-3 and AQ-4 identified in the SEIR would not apply to the CAP Update.

Construction activities that would occur under CAP Update implementation would result in temporary generation of odorous emissions. However, consistent with the less than significant impact determination of the 2024 SEIR, given the temporary and intermittent nature of the impacts, and dissipation of odor, construction-related odor impacts would be minor. Furthermore, construction activities would be required to comply with SDAPCD Rule 51 (Nuisance), which regulates nuisance odors (SDAPCD 1976).

Long-term changes resulting from implementation of the CAP Update would reduce GHG emissions generated within the city by implementing numerous transportation-, water-, waste-, and energy-related measures. For example, the implementation of the CAP Update would encourage the use of alternatively fueled vehicles through measures such as Measure T-8 which would involve installing and incentivizing public zero emission vehicle and bicycle infrastructure. This would reduce overall gasoline and fuel consumption, therefore reducing air pollutant emissions related to fossil fuel combustion. Other transportation-related measures such as Measures T-5, T-7, and T-10 would reduce VMT in the city by improving street connectivity, provide resources and incentives for alternative commutes, such as a carpool matching, and implement parking management strategies. Reducing VMT would reduce the emission of air pollutants by decreasing the consumption of fossil fuel in vehicles and reducing emissions related to tire and brake wear.

Actions aimed at diverting and eliminating solid waste from disposal in landfills would generate compostable materials and demand for compost products (e.g., Measure WD-1), which would lead to a need for haul trucks to transport these materials. Truck trips for hauling of organic waste to processing facilities would be offset by reductions in truck trips to landfills. Organic waste collected in the city is recycled at a Republic Services composting facility in Otay (City of Carlsbad 2024).

Energy-related measures such as Measure E-3.1 would continue to implement and enforce the city's reach code which is focused on requiring solar photovoltaic (PV) and other energy efficiency measures for new and existing nonresidential buildings, while Measure E-3.3 focuses on the installation of solar carports at city-owned parking lots. While these reduction measures were formulated to reduce GHGs, they would also improve overall air quality by reducing the emission of criteria air pollutants. A higher proportion of buildings powered by more efficient and/or renewable electric systems due to implementation of Measure E-3.1 would reduce natural gas combustion at nonresidential land uses within the city, which would also reduce local criteria air pollution. The effects associated with the reduction of air pollutant emissions in the city and SDAPCD would be largely beneficial and would, by nature, reduce the concentration of air pollutants. Therefore, operational activities under implementation of the CAP Update would not result in the exceedance of SDAPCD thresholds and would be considered consistent with the goals of the San Diego Regional Air Quality Strategy or State Implementation Plan. Operational activities would also not violate air quality standards or contribute to an existing air quality violation because project-related emissions would not exceed SDAPCD thresholds or result in a cumulatively considerable net increase of criteria pollutants for which the region is nonattainment under applicable federal or State ambient air quality standards.

The operation of the measures and actions in the CAP Update would not expose off-site sensitive receptors to substantial pollution concentrations. Measure WD-1 would result in increased odors from the anaerobic decomposition of composted waste and haul truck trips to composting facilities. These impacts would be avoided through implementation of an Odor Impact Minimization Plan (OIMP) as required by State regulation. Therefore, the CAP Update would not result in new emissions (such as those leading to odors) adversely affecting a substantial number of people.

Conclusion

There are no changes in circumstances or new information of substantial importance that would require major revisions to the 2024 SEIR or result in new significant effects or a substantial increase in the severity of previously identified effects related to air quality. Implementation of mitigation measures AQ-1 through AQ-4 from the SEIR are not applicable to the air quality impacts of the CAP Update. The CAP Update would not result in any new or substantially more severe significant impacts related to air quality.

Applicable Mitigation Measures from the SEIR

The SEIR identified mitigation measures AQ-1 through AQ-4 for air quality impacts. None of these mitigation measures are applicable to the CAP Update.

Biological Resources

SEIR Evaluation Criteria	SEIR Significance Conclusion	SEIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent SEIR Needed?					Project is within the Scope of the SEIR?
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?	Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))		
Would implementation of the CAP Update:								
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	Less than Significant with Mitigation	MM BIO-1 MM BIO-2	No	No	No	Yes	Yes	
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	Less than Significant with Mitigation	MM BIO-1 MM BIO-3 MM BIO-4	No	No	No	Yes	Yes	

SEIR Evaluation Criteria	SEIR Significance Conclusion	SEIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent SEIR Needed?					Project is within the Scope of the SEIR?
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?	Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162(a) Occur?		
c. Have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	Less than Significant with Mitigation	MM BIO-1 MM BIO-3 MM BIO-4 MM BIO-5	No	No	No	Yes	Yes	
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	Less than Significant with Mitigation	MM BIO-1 MM BIO-3 MM BIO-4	No	No	No	Yes	Yes	
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	Less than Significant with Mitigation	MM BIO-6	No	No	No	Yes	Yes	
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?	Less than Significant with Mitigation	MM BIO-1 MM BIO-2 MM BIO-3 MM BIO-4 MM BIO-7 MM BIO-8	No	No	No	Yes	Yes	

Previous CEQA Analysis Biological Resources Findings

The 2024 SEIR identified a less than significant impact related to a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service (BIO-1) with implementation of mitigation measures BIO-1 and BIO-2. The 2024 SEIR identified a less than significant impact to any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service (BIO-2) with implementation of mitigation measures BIO-1, BIO-3, and BIO-4. The 2024 SEIR identified a less than significant impact to State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) (BIO-3) with implementation of mitigation measures BIO-1, BIO-3, BIO-4, and BIO-5. The 2024 SEIR identified a less than significant impact to interfering substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impeding the use of native wildlife nursery sites (BIO-4) with implementation of mitigation measures BIO-1, BIO-3, and BIO-4. The 2024 SEIR identified a less than significant impact related to conflicts with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (BIO-5) with implementation of mitigation measure BIO-6. The 2024 SEIR identified a less than significant impact related to conflicts with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan (BIO-6) with implementation of mitigation measures BIO-1, BIO-2, BIO-3, BIO-4, BIO-7 and BIO-8 (Section 4.3, Biological Resources).

Addendum Analysis

Implementation of the CAP Update would include measures and actions that involve construction and ground disturbing activities, including minor grading and excavation. For example, Measures T-1, T-4, T-5, T-8, and T-9 would involve removing existing pavement; repaving roadway surfaces; painting or restriping pavement; modifying curbs; laying concrete, and installing traffic signals, lighting, landscaping, and trees. Some of these improvements, such as Measures E-3.3, W-1, and W-2, would require limited ground disturbance from construction activities. The CAP Update consists of minor improvements and building retrofits within the city and construction activities would occur in previously disturbed, developed areas such as roadways and parking lots that lack natural habitat and where candidate, sensitive, or special-status species or their habitats are not present. Therefore, implementation of the CAP Update would not cause a substantial adverse direct or indirect effect to special-status species. Because implementation of the CAP Update would occur in previously disturbed, developed areas, implementation of the CAP Update would not occur in areas where riparian habitat or other sensitive natural communities, protected wetlands, wildlife corridors, and protected biological resources are present. Furthermore, implementation of mitigation measure BIO-2 would reduce any impacts to candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service because the pre-construction bird surveys would ensure that active nests are identified and as necessary avoided. Implementation of mitigation measure BIO-2 would also reduce conflicts with the city's Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plans because it would assure compliance with the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (CFG) Section 3503. Implementation of mitigation measure BIO-6 would reduce any conflicts with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance because it would require a project-specific tree survey to determine measures to address impacts such as avoidance, minimization, restoration, or compensation.

Because duration of construction activities would be limited to relatively short periods, their temporary effects on biological resources would not be substantial.

Long-term changes resulting from implementation of CAP Update measures would include improvements at or near grade level of existing roadways, as well as minor changes to traffic intersections and walkways (through implementation of Measures T-1, T-4, T-5, T-8, and T-9), improvements to water and wastewater systems (Measures W-1 and W-2), planting of trees (through implementation of Measure CS-1). Implementation of Measures T-1, T-4, T-5, T-8, and T-9 would also result in the installation of new sidewalks, new and upgraded bikeways and walkways along existing developed roadways and rights-of-way in the city, and the installation of roundabouts or control traffic within the intersections of existing developed roadways. The CAP Update would not result in physical improvements or effects that would result in substantial long-term damage to biological resources.

Conclusion

There are no changes in circumstances or new information of substantial importance that would require major revisions to the 2024 SEIR or result in new significant effects or a substantial increase in the severity of previously identified effects related to biological resources. Implementation of mitigation measures BIO-1, BIO-3, BIO-4, BIO-5, BIO-7, and BIO-8 from the SEIR are not applicable to the CAP Update. Implementation of mitigation measure BIO-2 would ensure a less-than-significant impact to special-status biological resources. Implementation of mitigation measure BIO-6 would ensure a less-than-significant impact for conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. The CAP Update would not result in any new or substantially more severe significant impacts related to biological resources.

Applicable Mitigation Measures from the SEIR

The CAP Update would not result in more significant impacts related to biological resources. Mitigation Measures BIO-2 and BIO-6 from the 2024 SEIR would apply to the CAP Update and ensure CAP Update impacts related to biological resources are less than significant.

BIO-2 Pre-Construction Bird Surveys, Avoidance, and Notification

If construction activities are initiated during the bird nesting season (February 1 – August 31) involving removal of vegetation or other nesting bird habitat, including abandoned structures and other man-made features, a pre-construction nesting bird survey shall be conducted no more than three days prior to initiation of ground disturbance and vegetation removal activities. The nesting bird pre-construction survey shall be conducted on foot and shall include a 300-foot survey buffer around the construction site. The survey shall be conducted by a biologist familiar with the identification of avian species known to occur in southern California coastal communities (i.e., qualified biologist). If active nests are found, an avoidance buffer shall be determined by a qualified biologist in coordination with the city. The avoidance buffer width will depend upon the species, the proposed work activity, and existing disturbances associated with land uses outside of the site, which shall be demarcated by the biologist with bright orange construction fencing, flagging, construction lathe, or other means to demarcate the boundary. All construction personnel shall be notified as to the existence of the buffer zone and to avoid entering the buffer zone during the nesting season. No ground disturbing activities shall occur within the buffer until the biologist has confirmed that breeding/nesting is completed, and the young have fledged the nest. Encroachment into the buffer shall occur only at the discretion of the qualified biologist on the basis that the encroachment will not be detrimental to an active nest. A report summarizing the pre-construction survey(s) shall be prepared by a qualified biologist and shall be submitted to the city prior to the commencement of construction activities.

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BIO-6 Protected Tree and Tree Canopy Survey

Prior to the issuance of a grading permit, a tree survey shall be conducted by a certified arborist prior to project construction to tag and assess all trees subject to the city's Trees and Shrubs Ordinance (Municipal Code Title 11.12) and/or CFMP. A city arborist will inspect the property and recommend approving or denying the application in a written report submitted to the City Manager. The city shall post a letter of notification and a non-removable marking upon the subject tree a minimum of 30 days prior to its removal. The letter will be posted in a prominent location, visible from a public street and will include, the location of the tree, the reason for the trees removal, the date of the scheduled removal, the species of tree to be replanted, the size of the tree to be replanted, the date by which an appeal must be made to the parks and recreation commission, and a description of the appeal process.

The following measures shall be implemented in addition to those required under the city's permits required for tree removal and maintenance ordinance Guidelines (Municipal Code Title 11.12.090) to avoid and/or compensate for potential indirect impacts to preserved sensitive natural communities and protected trees within Carlsbad before, during, and following construction activities.

PRE-CONSTRUCTION

- **Fencing.** Protective fencing at least three feet high with signs and flagging shall be erected around all preserved sensitive natural communities where adjacent to proposed vegetation clearing and grubbing, grading, or other construction activities. The protective fence shall be installed at a minimum of five feet beyond the tree canopy dripline. The intent of protection fencing is to prevent inadvertent limb/vegetation damage, root damage and/or compaction by construction equipment. The protective fencing shall be depicted on all construction plans and maps provided to contractors and labeled clearly to prohibit entry, and the placement of the fence in the field shall be approved by a qualified biologist prior to initiation of construction activities. The contractor shall maintain the fence to keep it upright, taut and aligned at all times. Fencing shall be removed only after all construction activities are completed.
- **Pre-Construction Meeting.** A pre-construction meeting shall be held between all site contractors and a registered consulting arborist and/or a qualified biologist. All site contractors and their employees shall provide written acknowledgement of their receiving sensitive natural community protection training. This training shall include, but shall not be limited to, the following information: (1) the location and marking of protected sensitive natural communities; (2) the necessity of preventing damage to these sensitive natural communities; and (3) a discussion of work practices that shall accomplish such.

DURING CONSTRUCTION

- **Fence Monitoring.** The protective fence shall be monitored regularly (at least weekly) during construction activities to ensure that the fencing remains intact and functional, and that no encroachment has occurred into the protected natural community; any repairs to the fence or encroachment correction shall be conducted immediately.
- **Equipment Operation and Storage.** Contractors shall avoid using heavy equipment around the sensitive natural communities. Operating heavy machinery around the root zones of trees would increase soil compaction, which decreases soil aeration and, subsequently, reduces water penetration into the soil. All heavy equipment and vehicles shall, at minimum, stay out of the fenced protected zones, unless where specifically approved in writing and under the supervision of a registered consulting arborist and/or a qualified biologist.

- **Materials Storage and Disposal.** Contractors shall not store or discard any construction materials within the fenced protected zones and shall remove all foreign debris within these areas. The contractors shall leave the duff, mulch, chips, and leaves around the retained trees for water retention and nutrient supply. Contractors shall avoid draining or leakage of equipment fluids near retained trees. Fluids such as gasoline, diesel, oils, hydraulics, brake and transmission fluids, paint, paint thinners, and glycol (anti-freeze) shall be disposed of properly. The contractors shall ensure that equipment be parked at least 50 feet, and that equipment/vehicle refueling occur at least 100 feet, from fenced protected zones to avoid the possibility of leakage of equipment fluids into the soil.
- **Grade Changes.** Contractors shall ensure that grade changes, including adding fill, shall not be permitted within the fenced protected zone without special written authorization and under supervision by a registered consulting arborist and/or a qualified biologist. Lowering the grade within the fenced protected zones could necessitate cutting main support and feeder roots, thus jeopardizing the health and structural integrity of the tree(s). Adding soil, even temporarily, on top of the existing grade could compact the soil further, and decrease both water and air availability to the tree roots. Contractors shall ensure that grade changes made outside of the fenced protected zone shall not create conditions that allow water to pond.
- **Trenching.** Except where specifically approved in writing beforehand, all trenching shall be outside of the fenced protected zone. Roots primarily extend in a horizontal direction forming a support base to the tree similar to the base of a wineglass. Where trenching is necessary in areas that contain roots from retained trees, contractors shall use trenching techniques that include the use of either a root pruner (Dosko root pruner or equivalent) or an Air-Spade to limit root impacts. An International Society of Arboriculture (ISA) certified arborist or American Society of Consulting Arborists (ASCA) registered consulting arborist shall ensure that all pruning cuts shall be clean and sharp, to minimize ripping, tearing, and fracturing of the root system. Root damage caused by backhoes, earthmovers, dozers, or graders is severe and may ultimately result in tree mortality. Use of both root pruning and Air-Spade equipment shall be accompanied only by hand tools to remove soil from trench locations. The trench shall be made no deeper than necessary.
- **Erosion Control.** Appropriate erosion control best management practices (BMPs) shall be implemented to protect preserved sensitive natural communities during and following project construction. Erosion control materials shall be certified as weed free.
- **Inspection.** An ISA certified arborist or ASCA registered consulting arborist shall inspect the preserved trees adjacent to grading and construction activity on a monthly basis for the duration of the grading and construction activities. A report summarizing site conditions, observations, tree health, and recommendations for minimizing tree damage shall be submitted by the registered consulting arborist following each inspection.

POST-CONSTRUCTION

- **Mulch.** The contractors shall ensure that the natural duff layer under all trees adjacent to construction activities shall be maintained. This would stabilize soil temperatures in root zones, conserve soil moisture, and reduce erosion. The contractors shall ensure that the mulch be kept clear of the trunk base to avoid creating conditions favorable to the establishment and growth of decay causing fungal pathogens. Should it be necessary to add organic mulch beneath retained oak trees, packaged or commercial oak leaf mulch shall not be used as it may

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contain root fungus. Also, the use of redwood chips shall be avoided as certain inhibitive chemicals may be present in the wood. Other wood chips and crushed walnut shells can be used, but the best mulch that provides a source of nutrients for the tree is its own leaf litter. Any added organic mulch added by the contractors shall be applied to a maximum depth of 4 inches where possible.

- **Watering Adjacent Plant Material.** All installed landscaping plants near the preserved sensitive natural communities shall require moderate to low levels of water. The surrounding plants shall be watered infrequently with deep soaks and allowed to dry out in-between, rather than frequent light irrigation. The soil shall not be allowed to become saturated or stay continually wet, nor should drainage allow ponding of water. Irrigation spray shall not hit the trunk of any tree. The contractors shall maintain a 30-inch dry-zone around all tree trunks. An above ground micro-spray irrigation system shall be used in lieu of typical underground pop-up sprays.
- **Monitoring.** An ISA certified arborist or ASCA registered consulting arborist shall inspect the trees preserved on the site adjacent to construction activities for a period of two years following the completion of construction. Monitoring visits shall be completed quarterly, totaling eight visits. Following each monitoring visit, a report summarizing site conditions, observations, tree health, and recommendations for promoting tree health shall be submitted to the city. Additionally, any tree mortality shall be noted and any tree dying during the two-year monitoring period shall be replaced at a minimum 3:1 ratio on-site in coordination with the city.

Cultural Resources

SEIR Evaluation Criteria	SEIR Significance Conclusion	SEIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent SEIR Needed?					Project is within the Scope of the SEIR?
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?	Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))		
Would implementation of the CAP Update:								
a. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	Significant and Unavoidable	None	No	No	No	Yes	Yes	
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	Less than Significant	None	No	No	No	Yes	Yes	
c. Disturb any human remains, including those interred outside of formal cemeteries?	Less than Significant	None	No	No	No	Yes	Yes	

Previous CEQA Analysis Cultural Resources Findings

The 2024 SEIR identified a significant and unavoidable impact related to a substantial adverse change in the significance of a historical resource pursuant to §15064.5 and identified no feasible mitigation measures (CUL-1). The 2024 SEIR identified a less than significant impact related to a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5 (CUL-2). The 2024 SEIR also identified a less than significant impact for disturbing any human remains, including those interred outside of formal cemeteries (CUL-3) (Section 4.4, Cultural and Tribal Cultural Resources).

Addendum Analysis

Implementation of the CAP Update would result in physical changes to the environment that could occur in proximity to or involve encountering historical resources. For example, some improvements that result from the CAP Update, such as Measures T-1, T-4, T-5, T-8, T-9, CS-1, E-3.3, W-1, and W-2, would require limited ground disturbance. Energy efficiency improvements and building retrofits (Measure E-6) would involve minor changes to the exterior (e.g., rooftop solar panels) or interior (e.g., water heating and space heating and cooling systems) of existing buildings, and would not otherwise involve features with substantial height, bulk, or massing that would cause a substantial adverse change to a historic resource. Adherence to the relevant General Plan policies, the Historic Preservation Ordinance, and the relevant elements of the Carlsbad Cultural Resource Guidelines would protect historical resources from substantial adverse changes during CAP Update implementation.

Because ground disturbance associated with the implementation of CAP Update Measures T-1, T-4, T-5, T-8, T-9, CS-1, E-3.3, W-1, and W-2 would be limited to shallow depths, comprised of artificial fill or previously disturbed soils, archaeological resources are unlikely to be encountered. In addition, construction activities associated with CAP Update implementation would occur in already disturbed developed areas such as roadways and parking lots. Zero emission vehicle charging stations (Measure T-8) would be installed in new and existing developments, and roadway improvements such as roundabouts, traffic circles, walkways, and bicycle infrastructure would occur along existing developed roadways. In addition, tree planting associated with Measure CS-1 would likely occur within city parks and public rights-of-way. Furthermore, the Carlsbad Cultural Resource Guidelines addresses treatment of cultural resources to avoid substantial adverse effects should they be encountered during ground disturbance activities associated with the CAP Update. Therefore, with adherence to the Carlsbad Cultural Resource Guidelines, implementation of the CAP Update would not cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5.

The Carlsbad Cultural Resource Guidelines Standard Treatment 11: Post-Review Discoveries section addresses treatment of human remains should they be disturbed as a result of ground disturbing activities. Moreover, human burials, in addition to being potential archaeological resources, have specific provisions for treatment in Public Resources Code (PRC) Section 5097. The California Health and Safety Code (Section 7050.5, 7051, and 7054) has specific provisions for the protection of human burial remains. Existing regulations address the illegality of interfering with human burial remains, and protect them from disturbance, vandalism, or destruction. They also include established procedures to be implemented if Native American skeletal remains are discovered. PRC Section 5097.98 also addresses the disposition of Native American burials, protects such remains, and provides for the establishment of the NAHC to resolve any related disputes. All development projects are also subject to State of California Health and Safety Code Section 7050.5 which states that, if human remains are unearthed, no further disturbance can occur until the county coroner has made the necessary findings as to the origin and disposition of the remains pursuant to the PRC Section 5097.98.

If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission which will determine and notify a most likely descendant (MLD). The MLD shall complete the inspection of the site and make recommendations to the landowner within 48 hours of being granted access. With adherence to these existing regulations as well as the Carlsbad Cultural Resource Guidelines, implementation of the CAP Update would not disturb any human remains, including those interred outside of formal cemeteries.

Conclusion

There are no changes in circumstances or new information of substantial importance that would require major revisions to the 2024 SEIR or result in new significant effects or a substantial increase in the severity of previously identified effects related to cultural resources. The 2024 SEIR identified a significant and unavoidable impact for cultural resources (CUL-1) and did not identify feasible mitigation measures. The CAP Update would not result in any new or substantially more severe significant impacts related to cultural resources.

Applicable Mitigation Measures from the SEIR

There are no feasible mitigation measures from the 2024 SEIR to reduce impacts related to cultural resources.

Energy

SEIR Evaluation Criteria	SEIR Significance Conclusion	SEIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent SEIR Needed?					Project is within the Scope of the SEIR?
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?	Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))		
Would implementation of the CAP Update:								
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction and operation?	No Impact	None	No	No	No	No	Yes	Yes
b. Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?	No Impact	None	No	No	No	No	Yes	Yes

Previous CEQA Analysis Energy Findings

The 2024 SEIR identified no impact for the wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation or for conflicts with or obstruction of a State or local plan for renewable energy or energy efficiency (Section 4.16.2, Energy).

Addendum Analysis

Construction activities associated with implementation of the CAP Update measures and actions would result in short-term consumption of energy resulting from the use of construction equipment. The types of construction activities associated with the CAP Update would vary depending on the type of CAP Update measure. Examples of activities that would result from implementation of CAP Update measures include construction of new public zero emission vehicle and bicycle charging infrastructure, building efficiency retrofits, roundabouts or traffic circles, bicycle infrastructure, new solar carports, and water and wastewater system improvements (e.g., Measures T-1, T-2, T-3, T-4, T-5, T-8, T-9, E-3.3, W-1, and W-2). These activities would consume energy resources such as electricity, fuels, and non-renewable resources during construction. In addition, construction materials require energy to be produced, and would likely be used in projects that involve new construction or replacement of older materials. The California Green Building Standards Code (CALGreen) includes specific requirements related to recycling, construction materials, and energy efficiency standards, which would apply to construction projects envisioned by the CAP Update and help to minimize waste and energy consumption. Although implementation of the CAP Update would result in short-term construction activities that would consume energy resources, standard best management practices would discourage unnecessary idling and the operation of poorly maintained equipment during construction. In addition, the CAP Update includes measures that would reduce nonrenewable energy consumption during construction activities. For example, Measure OR-2 would increase the use of renewable and alternative fuel construction equipment, while Measure T-9 would establish city fleet regulations for idling, thus reducing construction vehicle idling time and further reducing construction related energy consumption.

Implementation of the CAP Update would improve operational energy efficiency and reduce the use of fossil fuels, for example through measures which reduce VMT (Measure T-2) and encourage zero emission vehicle use (Measure T-8), as well as measures which facilitate the increased generation and utilization of renewable energy Measures E-1 through E-6). The measures and actions in the CAP Update reduce GHG emissions, primarily by improving energy efficiency and decreasing consumption of fossil fuels and nonrenewable energy consumption. Thus, implementation of the CAP Update would not result in wasteful, inefficient, or unnecessary consumption of energy, consistent with the SEIR findings.

Where applicable, measures and actions associated with the CAP Update would be required to comply with CALGreen, the latest California Building Code (CBC) requirements, including CBC Energy Efficiency Standards, as well as all federal, State, and local rules and regulations pertaining to energy consumption and conservation. Through implementation of city policies as delineated in the city's General Plan, and concurrent implementation of the CAP Update, measures and actions would support the San Diego Regional Energy Strategy renewable energy goals and would not conflict with any applicable plan, policy, or regulation adopted regarding renewable energy or energy efficiency.

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Conclusion

There are no changes in circumstances or new information of substantial importance that would require major revisions to the 2024 SEIR or result in new significant effects or a substantial increase in the severity of previously identified effects related to energy. The 2024 SEIR did not identify significant energy impacts and did not identify mitigation measures. The CAP Update would not result in any new or substantially more severe significant impacts related to energy.

Applicable Mitigation Measures from the SEIR

There are no mitigation measures from the 2024 SEIR identified to reduce impacts related to energy.

Geology and Soils

**CEQA Guidelines Section 15162
Is a Subsequent SEIR Needed?**

SEIR Evaluation Criteria	SEIR Significance Conclusion	SEIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent SEIR Needed?				Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of the SEIR?
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?	Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))		

Would implementation of the CAP Update:

- a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
 - i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

	Less than Significant	None	No	No	No	Yes	Yes
ii. Strong seismic ground shaking?	Less than Significant	None	No	No	No	Yes	Yes
iii. Seismic-related ground failure, including liquefaction?	Less than Significant	None	No	No	No	Yes	Yes
iv. Landslides?	Less than Significant	None	No	No	No	Yes	Yes

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SEIR Evaluation Criteria	SEIR Significance Conclusion	SEIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent SEIR Needed?					Project is within the Scope of the SEIR?
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?	Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))		
b. Result in substantial soil erosion or the loss of topsoil?	Less than Significant	None	No	No	No	Yes	Yes	
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	Less than Significant	None	No	No	No	Yes	Yes	
d. Be located on expansive soil, as defined in Table 1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	Less than Significant	None	No	No	No	Yes	Yes	
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	Less than Significant	None	No	No	No	Yes	Yes	
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Less than Significant	None	No	No	No	Yes	Yes	

Previous CEQA Analysis Geology and Soils Findings

The 2024 SEIR identified less than significant impacts for the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault (GEO-1); and for the risk of loss, injury, or death involving strong seismic ground shaking, seismic-related ground failure, including liquefaction or landslides (GEO-2). The 2024 SEIR also identified less than significant impacts for substantial soil erosion or the loss of topsoil (GEO-3) and for on or off-site landslide, lateral spreading, subsidence, liquefaction or collapse, and location on expansive soils creating substantial direct or indirect risks to life or property (GEO-4). The 2024 SEIR identified less than significant impacts for soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater (GEO-5) and for the project to directly or indirectly destroy a unique paleontological resource or site or unique geologic feature (GEO-6) (Section 4.5, Geology and Soils).

Addendum Analysis

Measures and actions associated with the CAP Update include improvements to energy infrastructure (Measures E-1 through E-6), development of roundabouts (Measure T-1), bicycle infrastructure (Measure T-4), pedestrian infrastructure (Measure T-5), and improvements to water and wastewater infrastructure (Measures W-1, W-2). The measures identified in the CAP Update do not propose new housing nor do they propose changes to policies or regulations related to land use or residential zoning. Therefore, the CAP Update would not result in the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault or result in the risk of loss, injury, or death involving strong seismic ground shaking, seismic-related ground failure, including liquefaction or landslides. The CAP Update would not result in substantial soil erosion or the loss of topsoil or result in on or off-site landslide, lateral spreading, subsidence, liquefaction or collapse, and location on expansive soils creating substantial direct or indirect risks to life or property. The measures and actions in the CAP Update would not require use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.

Implementation of the CAP Update would include measures and actions (Measures T-1, T-4, T-5, T-8, T-9, CS-1, E-3.3, W-1, and W-2) that involve ground disturbing activities which could encounter paleontological resources in areas with moderate to high sensitivity. While encountering paleontological resources is possible during CAP Update implementation, it is unlikely because of the shallow depth of below ground disturbance associated with activities such as trenching to install zero emission vehicle and bicycle charging infrastructure and making improvements to public roadway rights-of-way to support walking and biking. For measures and actions requiring ground disturbance in areas underlain by sensitive geologic units, the Carlsbad Cultural Resource Guidelines require a review of primary literature and online databases, a paleontological assessment of the project area (plus a one-mile radius) by the San Diego Museum of Natural History, and a field survey to determine if paleontological resources or potentially fossiliferous sediments are present (if the sensitive sediments are exposed at the surface). The results of these analyses are used to create a Paleontological Assessment Report which will provide recommendations to mitigate impacts to paleontological resources, if necessary. The Carlsbad Cultural Resource Guidelines set forth mitigation measures.

Additionally, General Plan policies 7-P.7 through 7-P.11 of the Arts, History, Culture, and Education Element would reduce impacts to paleontological resources by implementing the Carlsbad Cultural Resource Guidelines; requiring monitoring of ground-disturbing activities in areas known to contain

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paleontological resources; and ensuring proper treatment and consultation of paleontological resources discovered during ground-disturbing activities. With compliance with these guidelines and General Plan policies, implementation of the CAP Update would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

Conclusion

There are no changes in circumstances or new information of substantial importance that would require major revisions to the 2024 SEIR or result in new significant effects or a substantial increase in the severity of previously identified effects related to geology and soils. The 2024 SEIR did not identify significant geology and soils impacts and did not identify mitigation measures. The CAP Update would not result in any new or substantially more severe significant impacts related to geology and soils.

Applicable Mitigation Measures from the SEIR

There are no mitigation measures from the 2024 SEIR identified to reduce impacts related to geology and soils.

Greenhouse Gas Emissions

SEIR Evaluation Criteria	SEIR Significance Conclusion	SEIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent SEIR Needed?					Project is within the Scope of the SEIR?
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?	Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15164(a) Occur?		
Would implementation of the CAP Update:								
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Significant and Unavoidable	GHG-1	No	No	No	Yes	Yes	
b. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	Significant and Unavoidable	GHG-1	No	No	No	Yes	Yes	

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Previous CEQA Analysis Greenhouse Gas Emissions Findings

The 2024 SEIR identified a significant and unavoidable impact for generating greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment and for conflicting with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases (GHG-1). It identifies Mitigation Measure GHG-1, which requires the preparation of this CAP Update to reduce the GHG emissions impacts identified in the 2024 SEIR (Section 4.6, Greenhouse Gas Emissions).

Addendum Analysis

The CAP Update establishes measures and actions that would reduce GHG emissions in Carlsbad to levels that achieve its GHG reduction targets, which are aligned with the State's GHG reduction goals. The city's 2035 target requires GHG emissions to be reduced 50 percent below 2016 levels (aligned with and extrapolated from SB 32) and reduced to 85 percent below 2016 levels by 2045 (aligned with AB 1279). The CAP Update measures and actions would meet the city's GHG reduction targets.

In addition, implementation of the CAP Update would result in physical changes to the environment that would involve short-term physical changes that could result in GHG emissions. Several of the measures and actions identified in the CAP Update promote construction of new facilities or retrofitting of existing facilities that would generate construction-related GHG emissions. Some examples of activities that would generate construction-related GHG emissions include retrofitting of existing buildings and developments to transition to renewable energy generation (Measures E-1, E-6, W-1, and W-2), constructing roundabouts or traffic circles (Measure T-1), installation of solar carports (Measure E-3.3), installation of zero emission vehicle charging stations (Measure T-8), improvements to pedestrian and bicycling infrastructure (Measures T-5 and T-4), and implementation of activities related to urban tree planting (Measure CS-1).

Implementation of the CAP Update would reduce overall GHG emissions generated within the city, for example by encouraging the use of alternative fuels in vehicles and equipment (Measures T-8, OR-1, and OR-2), reducing VMT (Measures T-5, T-7, and T-10), improving energy efficiency (Measures E-1 through E-6), reducing waste generation (Measure WD-1), and increasing carbon sequestration (Measure CS-1). In addition, measures that support energy efficiency and renewable energy generation would reduce GHG emissions at power plants generating electricity that serve the city. Thus, any temporary GHG emissions would be offset by the overall net benefit of GHG emissions reduction after implementation of the CAP Update. Therefore, implementation of the CAP Update would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, nor would implementation of the CAP Update conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

Conclusion

There are no changes in circumstances or new information of substantial importance that would require major revisions to the 2024 SEIR or result in new significant effects or a substantial increase in the severity of previously identified effects related to GHG emissions. Implementation of Mitigation Measure GHG-1, which requires preparation of the CAP Update evaluated in this Addendum No. 1, would be satisfied by preparation of the CAP Update, and therefore is not applicable to actions implementing the CAP Update. The CAP Update would not result in any new or substantially more severe significant impacts related to GHG emissions.

Applicable Mitigation Measures from the SEIR

The CAP Update satisfies the requirements of 2024 SEIR mitigation measure GHG-1; no other mitigation measures related to GHG emissions impacts are identified in the 2024 SEIR.

Hazards and Hazardous Materials

SEIR Evaluation Criteria	SEIR Significance Conclusion	SEIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent SEIR Needed?					Project is within the Scope of the SEIR?
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?	Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))		
Would implementation of the CAP Update:								
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Less than Significant	None	No	No	No	No	Yes	Yes
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	Less than Significant	None	No	No	No	No	Yes	Yes
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	Less than Significant	None	No	No	No	No	Yes	Yes

SEIR Evaluation Criteria	SEIR Significance Conclusion	SEIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent SEIR Needed?					Project is within the Scope of the SEIR?
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?	Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	
d. Be located on a site which is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	Less than Significant	None	No	No	No	No	Yes	Yes
e. For a project located within an airport land use plan area, or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	Less than Significant	None	No	No	No	No	Yes	Yes
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Less than Significant	None	No	No	No	No	Yes	Yes

Previous CEQA Analysis Hazards and Hazardous Materials Findings

The 2024 SEIR identified less than significant impacts for the routine transport, use, or disposal of hazardous materials and reasonably foreseeable upset and accident conditions involving the release of hazardous materials (HAZ-1); emitting or handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school (HAZ-2); being located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and creating a significant hazard to the public or the environment (HAZ-3); being located within an airport land use plan or within two miles of a public airport or public use airport and resulting in a safety hazard or excessive noise for people residing or working in the project area (HAZ-4); and for impairing implementation of or physically interfering with an adopted emergency response plan or emergency evacuation plan (HAZ-5) (Section 4.7, Hazards and Hazardous Materials).

Addendum Analysis

The implementation of the CAP Update measures and actions would result in short-term and long-term changes related to hazards and hazardous materials as described below.

Construction activities and routine maintenance associated with implementation of the CAP Update would result in short-term, temporary changes to hazards and hazardous materials conditions in the city. Although the types of construction activities associated with the CAP Update would vary depending on the type of CAP Update measure, they could result in an increase in the overall routine, transport, use and disposal of hazardous materials in the city for construction activities. For example, Measures T-1, T-4, T-5, T-8, and T-9 would involve removing existing pavement; repaving roadway surfaces; painting or restriping pavement; modifying curbs; laying concrete, and installing traffic signals, lighting, landscaping, street furniture, and other amenities. Construction activities would be short-term and temporary and would be required to comply with relevant federal, State, and local regulations that require strict adherence to guidelines regarding the safe use, transportation, and disposal of hazardous materials as well as ensuring the reduction of the potential for humans or the environment to be affected by an accidental release of hazardous materials. Enforcement of these regulatory standards would ensure that the measures and actions facilitated by implementation of the CAP Update would not create a significant hazard through reasonably foreseeable upset and/or accident conditions involving the release of hazardous materials into the environment. Compliance with applicable regulations would ensure that any hazardous materials used during the implementation of the CAP Update would not result in hazardous emissions within one-quarter mile of an existing or proposed school.

Some improvements as a result of the CAP Update, such as Measures E-3.3, W-1, and W-2, would require limited ground disturbance which could result in the release of contaminants into the environment, if they are present in the underlying soils and/or groundwater. In the event that CAP Update implementation results in ground disturbance, any residual contamination that is encountered would be remediated to allowable regulatory levels in accordance with applicable county and State regulations before any ground-disturbing activities are permitted to occur. Therefore, implementation of the CAP Update would not result in a significant hazard to the public or the environment due to being located on a hazardous materials site.

The McClellan–Palomar Airport is located near the center of the city and has a Land Use Compatibility Plan (ALUCP) developed and adopted by the San Diego County Airport Land Use Commission in 2010 and last amended in 2011 (San Diego County Regional Airport Authority 2011). The CAP Update measures and actions would not result in new or relocated residential land uses, other types of noise-

sensitive receptors, or new places of permanent employment where residents or workers could be exposed to a safety hazard or excessive noise. Therefore, implementation of the CAP Update would not expose residents or workers to a safety hazard or excessive noise levels.

Long-term changes resulting from implementation of CAP Update measures and actions would include improvements at or near grade level of existing roadways, new and upgraded bikeways and sidewalks along existing developed roadways and rights-of-way in the city, the installation of roundabouts or traffic circles to control traffic within the intersections of existing developed roadways, and the installation of zero emission charging infrastructure (through implementation of Measures T-1, T-4, T-5, T-8, and T-9). However, these improvements would not adversely affect the capacity of roadways during an emergency or evacuation. CAP Update Measure T-1, which encourages the installation of roundabouts, would reduce congestion, thus increasing traffic flow and the ability to evacuate during an emergency. Furthermore, the CAP Update measures and actions would comply with the San Diego County Emergency Operations Plan (EOP) and the California Fire Code. Therefore, implementation of the CAP Update would not impair or interfere with adopted emergency response or evacuation plans.

Conclusion

There are no changes in circumstances or new information of substantial importance that would require major revisions to the 2024 SEIR or result in new significant effects or a substantial increase in the severity of previously identified effects related to hazards and hazardous materials. The 2024 SEIR did not identify significant hazards and hazardous material impacts and did not identify mitigation measures. The CAP Update would not result in any new or substantially more severe significant impacts related to hazards and hazardous material.

Applicable Mitigation Measures from the SEIR

There are no mitigation measures from the 2024 SEIR identified to reduce impacts related to hazards and hazardous materials.

Hydrology and Water Quality

SEIR Evaluation Criteria	SEIR Significance Conclusion	SEIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent SEIR Needed?					Project is within the Scope of the SEIR?
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?	Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))		
Would implementation of the CAP Update:								
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	Less than Significant	None	No	No	No	No	Yes	Yes
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge, such that the project may impede sustainable groundwater management of the basin?	Less than Significant	None	No	No	No	No	Yes	Yes

SEIR Evaluation Criteria	CEQA Guidelines Section 15162 Is a Subsequent SEIR Needed?						
	SEIR Significance Conclusion	SEIR Mitigation Measures	Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?	Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162(a)	Project is within the Scope of the SEIR?
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces in a manner which would:							
i. result in substantial erosion or siltation, on- or off-site;							
ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	Less than Significant	None	No	No	No	Yes	Yes
iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial sources of polluted runoff; or							
iv. impede or redirect flood flows?							
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	Less than Significant	None	No	No	No	Yes	Yes

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SEIR Evaluation Criteria	SEIR Significance Conclusion	SEIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent SEIR Needed?					Project is within the Scope of the SEIR?
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?	Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162(a) Occur?		
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	Less than Significant	None	No	No	No	Yes	Yes	

Previous CEQA Analysis Hydrology and Water Quality Findings

The 2024 SEIR identified less than significant impacts related to the violation of water quality standards, waste discharge requirements (WDR's), or otherwise degradation of surface or ground water quality (HYD-1); decreasing groundwater supplies or interfering with groundwater recharge (HYD-2); altering the existing drainage patterns through the alteration of the course of a stream or river or through the addition of impervious surfaces resulting in substantial erosion or siltation on- or off-site, increasing the rate or amount of surface runoff in a manner which would result in flooding on- or off-site, or creating or contributing runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff (HYD-3); impede or redirect flood flows or in flood hazard, tsunami, or seiche zones risk release of pollutants due to project inundation (HYD-4); conflicts with or obstruction of implementation of a water quality control plan or sustainable groundwater management plan (HYD-5) (Section 4.8, Hydrology and Water Quality).

Addendum Analysis

The implementation of the CAP Update measures and actions would result in short-term and long-term changes related to hydrology and water quality as described below.

The CAP Update measures involving construction activity would require minor grading, excavation, and other ground disturbance associated with removing existing pavement; repaving roadway surfaces; painting or restriping pavement; modifying curbs; laying concrete, and installing traffic signals, lighting, landscaping, street furniture, and other amenities (through implementation of Measures T-1, T-4, T-5, T-8, and T-9). Measures E-3.3, W-1, W-2, and CS-1 would also involve ground-disturbing activities, which could, depending on their location, potentially cause soil erosion which in turn can contaminate nearby surface water. However, implementation of the measures and actions in the CAP Update would be required to comply with State and local water quality regulations designed to control erosion and protect water quality during construction. This includes compliance with the requirements of the State Water Resources Control Board (SWRCB) Construction General Permit, which requires preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP) for projects that disturb one acre or more of land. Erosion and sediment controls identified in the SWPPP would substantially reduce the amount of soil disturbance, erosion, and sediment transport into receiving waters, and pollutants in site runoff during construction. The CMC also sets forth requirements and BMPs pertaining to the mitigation of erosion, sediment control and runoff as outlined in CMC Chapter 15.12 and Chapter 15.16. Through compliance with all applicable regulations and permits, implementation of the CAP Update would not violate any water quality standards or WDRs or otherwise substantially degrade water quality; substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site, increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site, or create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.

The CAP Update measures and actions involving ground disturbing activities (Measures T-1, T-4, T-5, T-8, T-9, E-3.3, W-1, W-2, CS-1) could require the use of water for dust abatement as needed via a water truck. However, the ground disturbing activities would be temporary and intermittent and would not involve the substantial use of groundwater or otherwise affect recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level.

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Furthermore, implementation of the CAP Update would not involve development of residential land uses or other types of land development or induce population growth in an area that would increase water demand. In addition, the city requires new construction and redevelopment to use low impact development (LID) techniques. These techniques would ensure that pervious surfaces are incorporated into development that would be facilitated by the project. Therefore, implementation of the CAP Update would not decrease groundwater supplies or interfere with groundwater recharge.

Long-term changes resulting from implementation of the CAP Update measures would include improvements at or near grade level of existing roadways, as well as minor changes to traffic intersections and walkways (through implementation of Measures T-1, T-4, T-5, T-8, and T-9), improvements to water and wastewater systems (Measures W-1 and W-2), and the planting of trees (through implementation of Measure CS-1). The CMC requires BMPs to control the volume, rate, and potential pollutant load of stormwater runoff from new development and redevelopment projects as a requirement of the Municipal Stormwater Permit. Furthermore, the city's LID ordinance in Chapter 15.12.080 aims to specifically reduce the amount of surface runoff and aid in groundwater recharge through techniques such as infiltration, evapotranspiration, bioretention and/or rainfall harvest and additional uses in accordance with the requirements set forth in the MS4 permit and the LID standards manual. Given compliance with the above regulations and requirements, implementation of the CAP Update would not alter the existing drainage patterns or contribute runoff water in a manner which would result in substantial erosion, siltation, or flooding, nor would it exceed the capacity of existing or planned stormwater drainage systems.

Conclusion

There are no changes in circumstances or new information of substantial importance that would require major revisions to the 2024 SEIR or result in new significant effects or a substantial increase in the severity of previously identified effects related to hydrology and water quality. The 2024 SEIR did not identify significant hydrology and water quality impacts and did not identify mitigation measures. The CAP Update would not result in any new or substantially more severe significant impacts related to hydrology and water quality.

Applicable Mitigation Measures from the SEIR

There are no mitigation measures from the 2024 SEIR identified to reduce impacts related to hydrology and water quality.

Land Use and Planning

SEIR Evaluation Criteria	SEIR Significance Conclusion	SEIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent SEIR Needed?				
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?	Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of the SEIR?
Would implementation of the CAP Update:							
a. Physically divide an established community?	No Impact	None	No	No	No	Yes	Yes
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	Less than Significant	None	No	No	No	Yes	Yes

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Previous CEQA Analysis Land Use and Planning Findings

The 2024 SEIR identified no impact for physically dividing an established community (LU-1) and a less than significant impact for conflicts with any land use plan, policy, or regulation (LU-2) (Section 4.9, Land Use and Planning).

Addendum Analysis

Implementation of the CAP Update would not result in physical improvements that could physically divide a community. For example, measures resulting in construction of roundabouts or traffic circles (T-1) and bikeways (T-4) would reduce vehicle congestion and encourage bicycle trips, which would increase community connectivity and access. Implementation of Measure T-5 would also increase community connectivity and access by adding 6.1 miles of sidewalk to existing infrastructure and increasing the connectivity of sidewalk networks. As such, the CAP Update measures and actions are intended to improve, rather than impair, community connectivity and access throughout the city. Therefore, implementation of the CAP Update would not result in construction of physical barriers that would physically divide an established community.

The CAP Update measures and actions would include improvements to the city's existing pedestrian, bicycle, and transit network within developed areas (Measures T-1, T-3, T-4, and T-5). Implementation of the CAP Update would not change existing land uses and would comply with all applicable land use plans, policies, and regulations, including SANDAG's 2021 Regional Plan and the city's 2015 General Plan. Therefore, implementation of the CAP Update would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Conclusion

There are no changes in circumstances or new information of substantial importance that would require major revisions to the 2024 SEIR or result in new significant effects or a substantial increase in the severity of previously identified effects related to land use and planning. The 2024 SEIR did not identify significant land use and planning impacts and did not identify mitigation measures. The CAP Update would not result in any new or substantially more severe significant impacts related to land use and planning.

Applicable Mitigation Measures from the SEIR

There are no mitigation measures from the 2024 SEIR identified to reduce impacts related to land use and planning.

Mineral Resources

SEIR Evaluation Criteria	SEIR Significance Conclusion	SEIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent SEIR Needed?					Project is within the Scope of the SEIR?
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?	Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))		
Would implementation of the CAP Update:								
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?	No Impact	None	No	No	No	Yes	Yes	
b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	No Impact	None	No	No	No	Yes	Yes	

Previous CEQA Analysis Mineral Resources Findings

The 2024 SEIR identified no impacts to the loss of availability of a known mineral resource that would be of value to the region and the residents of the State, or the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan (Section 4.16.3, Mineral Resources).

Addendum Analysis

Carlsbad does not have mineral resources of economic value or active mining sites (City of Carlsbad 2015), therefore the 2024 SEIR identified no impacts to the loss of availability of a known mineral resource that would be of value to the region and the residents of the State, or the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. Similarly, implementation of the CAP Update would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State, or result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan.

Conclusion

There are no changes in circumstances or new information of substantial importance that would require major revisions to the 2024 SEIR or result in new significant effects or a substantial increase in the severity of previously identified effects related to mineral resources. The 2024 SEIR did not identify significant mineral resources impacts and did not identify mitigation measures. The CAP Update would not result in any new or substantially more severe significant impacts related to mineral resources.

Applicable Mitigation Measures from the SEIR

There are no mitigation measures from the 2024 SEIR identified to reduce impacts related to mineral resources.

Noise

SEIR Evaluation Criteria	SEIR Significance Conclusion	SEIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent SEIR Needed?					Project is within the Scope of the SEIR?
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?	Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))		
Would implementation of the CAP Update:								
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	Significant and Unavoidable (construction) Less than Significant (operation)	MM NOI-1	No	No	No	Yes	Yes	
b. Generation of excessive groundborne vibration or groundborne noise levels?	Less than Significant with Mitigation	MM NOI-2	No	No	No	Yes	Yes	

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c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Less than Significant

None

No

No

No

Yes

Yes

Previous CEQA Analysis Noise Findings

The 2024 SEIR identified that although mitigation measure NOI-1 would reduce construction noise impacts for projects located within 500 feet of noise-sensitive land uses, it conservatively concluded impacts to be significant and unavoidable related to construction activities generating a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies (NOI-1). The 2024 SEIR identified a less than significant impact related to operational activities generating a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies (NOI-2). The 2024 SEIR identified a less than significant impact related to the generation of excessive groundborne vibration or groundborne noise levels (NOI-3) with implementation of mitigation measure NOI-2. The 2024 SEIR also identified a less than significant impact related to excessive noise levels within the vicinity of a private airstrip or an airport land use plan or (NOI-4) (Section 4.10, Noise).

Addendum Analysis

The implementation of the CAP Update measures and actions would result in short-term changes related to noise as described below.

Construction activities associated with the implementation of the CAP Update, such as equipment use, construction of new facilities or retrofitting of existing facilities, would result in construction-related noise in the city. The types of construction activities associated with the CAP Update would vary depending on the type of CAP Update measure. CAP Update measures that may result in the generation of noise associated with construction activities include construction of new public zero emission vehicle and bicycle charging infrastructure, building efficiency retrofits, roundabouts or traffic circles, bicycle infrastructure, new solar carports, and water and wastewater system improvements (e.g., Measures T-1, T-2, T-3, T-4, T-5, T-8, T-9, E-3.3, W-1, and W-2). Construction activities associated with CAP Update measures and actions may involve using construction equipment and vehicles to remove existing pavement; repave roadway surfaces; paint or restripe pavement; modify curbs; lay concrete, and install traffic signals, lighting, landscaping, street furniture, and other amenities. Construction equipment that could be used includes concrete saws for hardscape removal, backhoes or mini excavators, skip loaders, smooth drum rollers, dump trucks, and striping and paving machines, depending on the CAP Update measure. Construction activities associated with the CAP Update would be short-term and would not involve equipment or activities, such as blasting or pile driving that would result in the generation of a substantial temporary or permanent increase in ambient noise levels or the generation of excessive groundborne vibration or groundborne noise levels.

Construction activities associated with the implementation of the CAP Update would not include two subterranean levels or more (generally more than 20,000 cubic yards of excavated soil material), and would be short term, thus avoiding a construction duration of 18 months. Construction activities associated with the implementation of the CAP Update would not require use of large, heavy-duty equipment types used in housing development projects or require pile driving, therefore, mitigation measures NOI-1 and NOI-2 identified in the SEIR that were specific to impacts associated with housing development permitted under implementation of the Housing Element Update would not apply to the CAP Update.

Implementation of the CAP Update would be subject to existing city noise policies and regulations and General Plan policies and programs, specifically those found in the Noise Element, and other local agency policies and regulations pertaining to noise at any development site. Compliance with

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Occupational Safety and Health Administration (OSHA) standards for worker safety would minimize exposure of workers to excessive noise levels. Therefore, implementation of measures and actions included in the CAP Update would not create a permanent increase in ambient noise levels or produce a new permanent source of noise, and construction-related noise impacts would be reduced through enforcement of applicable city or other local agency noise policies.

Long-term changes resulting from operation of the measures and actions in the CAP Update would not permanently introduce any new stationary sources of noise (e.g., machinery, pumps, fans, compressors, or other equipment) and would not generate new vehicle trips that would result in transportation-related noise. The transportation-related measures such as Measures T-5, T-7, and T-10 would reduce VMT in the city by improving street connectivity, provide resources and incentives for alternative commutes, such as a carpool matching, and implement parking management strategies. Reducing VMT would reduce transportation-related noise. Therefore, the CAP Update would not result in a substantial temporary or permanent increase in ambient noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies or in the generation of excessive groundborne vibration or groundborne noise levels.

The CAP Update does not propose any new sensitive receptors (e.g., residences, schools) that could be adversely impacted from noise associated with aircraft flyovers. Temporary construction workers would not be adversely affected by aircraft flyover as noise generated from construction equipment would be the dominant noise exposure to them, which is generally dealt with by wearing ear plugs to prevent hearing damage. Furthermore, long-term maintenance workers would not sleep on-site; thus, they would not be exposed to potential sleep disturbance from aircraft flyovers. Thus, implementation of the CAP Update would not expose people residing or working near an airport to excessive airport/aircraft noise.

Conclusion

There are no changes in circumstances or new information of substantial importance that would require major revisions to the 2024 SEIR or result in new significant effects or a substantial increase in the severity of previously identified effects related to noise. Implementation of mitigation measures NOI-1 and NOI-2 from the 2024 SEIR are not applicable to the CAP Update. The CAP Update would not result in any new or substantially more severe significant impacts related to noise.

Applicable Mitigation Measures from the SEIR

The SEIR identified Mitigation Measures NOI-1 and NOI-2 for noise impacts. Neither of these mitigation measures are applicable to the CAP Update.

Population and Housing

SEIR Evaluation Criteria	SEIR Significance Conclusion	SEIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent SEIR Needed?					Project is within the Scope of the SEIR?
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?	Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))		
Would implementation of the CAP Update:								
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads and other infrastructure)?	Less than Significant	None	No	No	No	Yes	Yes	
b. Displace substantial numbers of existing housing or people, necessitating the construction of replacement housing elsewhere?	Less than Significant	None	No	No	No	Yes	Yes	

Previous CEQA Analysis Population and Housing Findings

The 2024 SEIR identified less than significant impacts for unplanned population growth (PH-1) and substantial displacement of existing people or housing, necessitating the construction of replacement housing elsewhere (PH-2) (Section 4.11, Population and Housing).

Addendum Analysis

Construction activities associated with the implementation of the CAP Update could require a temporary increase in the number of construction workers traveling into the city to perform construction work. These types of projects would be small, short-term, and temporary construction projects, which would not require a large construction crew. Furthermore, construction workers would likely be from Carlsbad or the greater San Diego region and permanent, substantial relocation of workers would not be required. Therefore, implementation of the CAP Update would not result in substantial population growth or employment growth in the city.

Implementation of the CAP Update would not displace people or housing because the measures and actions in the CAP Update would not require the removal of existing housing and would not propose changes to policies or regulations related to land use or residential zoning or otherwise increase population growth in the city or surrounding areas. Therefore, implementation of the CAP Update would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

Conclusion

There are no changes in circumstances or new information of substantial importance that would require major revisions to the 2024 SEIR or result in new significant effects or a substantial increase in the severity of previously identified effects related to population and housing. The 2024 SEIR did not identify significant population and housing impacts and did not identify mitigation measures. The CAP Update would not result in any new or substantially more severe significant impacts related to population and housing.

Applicable Mitigation Measures from the SEIR

There are no mitigation measures from the 2024 SEIR identified to reduce impacts related to population and housing.

Public Services

SEIR Evaluation Criteria	SEIR Significance Conclusion	SEIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent SEIR Needed?				
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?	Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162(a) Occur?	Project is within the Scope of the SEIR?
Would implementation of the CAP Update: <ul style="list-style-type: none"> a. Result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services: <ul style="list-style-type: none"> • Fire? • Police protection? • Schools? • Parks? • Other public facilities? 	Less than Significant	None	No	No	No	Yes	Yes

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Previous CEQA Analysis Public Services Findings

The 2024 SEIR identified less than significant impacts associated with the provision of new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services, including fire protection services (PS-1), police protection services (PS-2), and schools (PS-3) (Section 4.12, Public Services and Recreation).

Addendum Analysis

The CAP Update would not generate new or increased demand for fire protection services or interfere with or modify the ability of police and fire protection services to meet performance objectives or response times outlined in the 2024 SEIR. The CAP Update does not include development of new residences or the creation of substantial numbers of permanent jobs requiring increased fire or police services. The CAP Update would not induce population growth in the community that would require school services, new or expanded park facilities, other public facilities. The measures and actions from the CAP Update would not generate increased demand for public services such that construction of new or expanded facilities would be required to maintain adequate service ratios. Therefore, implementation of the CAP Update would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities.

Conclusion

There are no changes in circumstances or new information of substantial importance that would require major revisions to the 2024 SEIR or result in new significant effects or a substantial increase in the severity of previously identified effects related to public services. The 2024 SEIR did not identify significant public services impacts and did not identify mitigation measures. The CAP Update would not result in any new or substantially more severe significant impacts related to public services.

Applicable Mitigation Measures from the SEIR

There are no mitigation measures from the 2024 SEIR identified to reduce impacts related to public services.

Recreation

SEIR Evaluation Criteria	SEIR Significance Conclusion	SEIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent SEIR Needed?					Project is within the Scope of the SEIR?
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?	Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))		
Would implementation of the CAP Update:								
a. Would the project increase the use of existing neighborhood and regional parks, or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	Less than Significant	None	No	No	No	Yes	Yes	
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	Less than Significant	None	No	No	No	Yes	Yes	

Previous CEQA Analysis Recreation Findings

The 2024 SEIR identified less than significant impacts associated with the provision of new or physically altered parks, or the need for new or physically altered parks, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives (PS-4). The 2024 SEIR identified less than significant impacts related to the increase in use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated and for including recreational facilities or requiring the construction or expansion of recreational facilities which might have an adverse physical effect on the environment (PS-4) (Section 4.12, Public Services and Recreation).

Addendum Analysis

The CAP Update would not generate new or increased demand for parks and recreation facilities. Typically, this impact occurs when a project induces population growth, such as new development or a business that would necessitate a large number of new employees. The CAP Update does not include development of new residences or the creation of substantial numbers of permanent jobs. Therefore, implementation of the CAP Update would not result in substantial adverse physical impacts associated with the provision of new or physically altered park facilities. Implementation of the CAP Update would also not increase the use of recreational facilities to the extent that substantial deterioration would occur or require the construction or expansion of recreational facilities.

Conclusion

There are no changes in circumstances or new information of substantial importance that would require major revisions to the 2024 SEIR or result in new significant effects or a substantial increase in the severity of previously identified effects related to recreation. The 2024 SEIR did not identify significant recreation impacts and did not identify mitigation measures. The CAP Update would not result in any new or substantially more severe significant impacts related to recreation.

Applicable Mitigation Measures from the SEIR

There are no mitigation measures from the 2024 SEIR identified to reduce impacts related to recreation.

Transportation

SEIR Evaluation Criteria	SEIR Significance Conclusion	SEIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent SEIR Needed?				Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162(a) Occur?	Project is within the Scope of the SEIR?
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?	Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162(a) Occur?		
Would implementation of the CAP Update:								
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	Less than Significant	None	No	No	No	Yes	Yes	
b. Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?	Significant and Unavoidable	MM T-1	No	No	No	Yes	Yes	
c. Substantially increase hazards due to a geometric design feature ((e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)	Less than Significant	None	No	No	No	Yes	Yes	
d. Result in inadequate emergency access?	Less than Significant	None	No	No	No	Yes	Yes	

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Previous CEQA Analysis Transportation Findings

The 2024 SEIR identified a less than significant impact for conflicts with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities (T-1). The 2024 SEIR identified that although mitigation measure T-1 would aim to achieve VMT reductions for development projects, it concluded impacts to be significant and unavoidable related to CEQA Guidelines Section 15064.3, subdivision (b) (T-2). The 2024 SEIR identified a less than significant impact related to substantially increasing hazards due to a geometric design feature (T-3) and for inadequate emergency access (T-4) (Section 4.13, Transportation).

Addendum Analysis

Overall, implementation of the CAP Update (e.g., Measures T-1 through T-7 and T-10) would result in lower total annual VMT levels in the city. However, short-term construction activities associated with the CAP Update would lead to minor, temporary disruptions to traffic circulation patterns during the period of construction. Projects that would require construction include retrofitting of existing buildings and developments to transition to higher energy efficiency and renewable energy generation (Measures E-1, E-6, W-1, and W-2), constructing roundabouts or traffic circles (Measure T-1), installation of solar carports (Measure E-3.3), installation of zero emission vehicle charging stations (Measure T-8), improvements to pedestrian and bicycling infrastructure (Measures T-5 and T-4), and implementation of activities related to urban tree planting (Measure CS-1).

Long-term transportation changes could result from actions aimed at diverting and eliminating solid waste; for example, generation of more compostable materials and demand for compost products (Measure WD-1) would lead to a need for haul trucks to transport these materials. Truck trips for hauling of organic waste to processing facilities would be offset by reductions in truck trips to landfills. Organic waste collected in the city is recycled at a Republic Services composting facility in Otay (City of Carlsbad 2024). Other long-term transportation changes associated with the CAP Update could result from actions that increase transit use and reduce commuting and traffic congestion. Actions such as increasing the number of roundabouts or traffic circles (Measure T-1), and incentivizing people to use alternative modes of travel (Measures T-2 and T-8) would lead to reduced traffic congestion. Changes to circulation patterns for pedestrian and cycling mobility modes would result from implementation of new pedestrian and bicycling routes, as well as enhancement of existing infrastructure (e.g., adding lanes, buffers, and sidewalks). Implementation of the CAP Update would improve the operation of the circulation system in several ways, including fewer vehicle trips on roadways and highways and higher numbers of transit riders. Therefore, implementation of the CAP Update would not adversely affect the performance of the circulation system and would not conflict with any applicable transportation plans, ordinances, or policies.

Implementation of the CAP Update would not induce substantial population or employment growth in the city that would in turn generate increased VMT. Construction activities associated with the CAP Update measures and actions would not require a large construction crew. Any temporary VMT increases associated with construction activities would be more than offset by the CAP Update's overall effect of reducing the long-term rate of VMT in the city. Therefore, CAP Update implementation would not conflict or be inconsistent with CEQA Guidelines section 15064.3(b). SEIR mitigation measure T-1, which would reduce VMT levels of housing development identified in the SEIR, is not applicable to the CAP Update because the CAP Update would result in decreased levels of VMT in the city.

The city maintains improvement standards that guide the construction of new transportation facilities to minimize design hazards for all users of the system. Furthermore, General Plan policies 3-P.10, 3-P.12, 3-P.13, and 3-P.16 would reduce impacts related to safety. Therefore, implementation of the CAP Update would not substantially increase hazards due to a geometric design feature.

In the short-term, implementation of the CAP Update would have the potential to affect emergency access during construction of individual projects facilitated by the CAP Update. For example, construction pertaining to improving pedestrian and bicycle infrastructure and safety (Measures T-4 and T-5) could temporarily alter existing roadways that serve as emergency access routes. In the long-term, the CAP Update would not result in new development or land uses that would require installation of emergency access routes. Activities implementing the CAP Update would not be permitted to conflict with regulatory requirements to provide adequate accommodation of fire access to structure frontages, multiple access points to development, as well as adequate width, height, and turning radius of roadways and access points, pursuant to California Building Code and California Fire Code requirements. Activities implementing the CAP Update would be required to comply with city and San Diego County standards and requirements and would undergo review by public safety officials as part of the approval process. Additionally, General Plan policies 3-P.12, 3-P.29, 3-P.30, and 3-P.33 would prevent CAP update implementation from resulting in physical effects that impede or obstruct emergency access. Therefore, implementation of the CAP Update would not result in inadequate emergency access.

Conclusion

There are no changes in circumstances or new information of substantial importance that would require major revisions to the 2024 SEIR or result in new significant effects or a substantial increase in the severity of previously identified effects related to transportation. Implementation of Mitigation Measure T-1 from the 2024 SEIR is not applicable to the CAP Update. The CAP Update would not result in any new or substantially more severe significant impacts related to transportation.

Applicable Mitigation Measures from the SEIR

The 2024 SEIR identified Mitigation Measure T-1 for transportation impact T-2. This mitigation measure is not applicable to the CAP Update.

Tribal Cultural Resources

SEIR Evaluation Criteria	SEIR Significance Conclusion	SEIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent SEIR Needed?					
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?	Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of the SEIR?	
Would implementation of the CAP Update:								
a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code §21074 as either a site, feature, place cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	Less than Significant	None	No	No	No	Yes	Yes	
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or								

		CEQA Guidelines Section 15162 Is a Subsequent SEIR Needed?						
SEIR Evaluation Criteria		SEIR Significance Conclusion	SEIR Mitigation Measures	Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?	Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of the SEIR?
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision c of Public Resources Code §5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.								

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Previous CEQA Analysis Tribal Cultural Resources Findings

The 2024 SEIR identified less than significant impacts related to causing a substantial adverse change in the significance of a Tribal cultural resource as defined in Public Resources Code Section 21074 that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k) or pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1 (CUL-4) (Section 4.4, Cultural and Tribal Cultural Resources).

Addendum Analysis

Implementation of the CAP Update would result in physical changes to the environment that could occur in proximity to or involve encountering tribal cultural resources. For example, some improvements that result from the CAP Update, such as Measures T-1, T-4, T-5, T-8, T-9, CS-1, E-3.3, W-1, and W-2, would require ground disturbing activities, including minor grading and excavation, during which, depending on their location, a tribal cultural resource could be encountered. The Carlsbad Cultural Resource Guidelines addresses identification and treatment of tribal cultural resources that may be impacted as a result of the CAP Update. Therefore, implementation of the CAP Update would not cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k). Since the CAP Update would adhere to the Carlsbad Cultural Resource Guidelines, it would not cause a substantial adverse change in the significance of a tribal cultural resource, pursuant to criteria set forth in subdivision (c) of Public Resources Code §5024.1.

Conclusion

There are no changes in circumstances or new information of substantial importance that would require major revisions to the 2024 SEIR or result in new significant effects or a substantial increase in the severity of previously identified effects related to tribal cultural resources. The 2024 SEIR did not identify significant tribal cultural resources impacts and did not identify mitigation measures. The CAP Update would not result in any new or substantially more severe significant impacts related to tribal cultural resources.

Applicable Mitigation Measures from the SEIR

There are no mitigation measures from the 2024 SEIR identified to reduce impacts related to tribal cultural resources.

Utilities and Service Systems

SEIR Evaluation Criteria	SEIR Significance Conclusion	SEIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent SEIR Needed?					Project is within the Scope of the SEIR?
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?	Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))		
Would implementation of the CAP Update:								
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	Less than Significant	None	No	No	No	Yes	Yes	
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	Less than Significant	None	No	No	No	Yes	Yes	

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SEIR Evaluation Criteria	SEIR Significance Conclusion	SEIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent SEIR Needed?				Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of the SEIR?
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?	Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))		
c. Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	Less than Significant	None	No	No	No	Yes	Yes	
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	Less than Significant	None	No	No	No	Yes	Yes	
e. Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?	Less than Significant	None	No	No	No	Yes	Yes	

Previous CEQA Analysis Utilities and Service Systems Findings

The 2024 SEIR identified less than significant impacts related to the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities (UTIL-1); sufficient water supplies during normal, dry and multiple dry years (UTIL-2); adequate wastewater treatment capacity (UTIL-3); the generation of solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals and compliance with federal, State, and local management and reduction statutes and regulations related to solid waste (UTIL-4) (Section 4.14, Utilities and Service Systems).

Addendum Analysis

Implementation of the CAP Update would not increase development or induce population growth directly or indirectly, because measures and actions do not propose new housing nor do they propose changes to policies or regulations related to land use or residential or nonresidential zoning. Although tree planting (Measure CS-1) would potentially increase demand for water used for irrigation, the CAP Update would be required to comply with General Plan policies 9-P.3 through 9-P.6, which would reduce impacts to water services and facilities by promoting water saving measures such as water sub-metering, using recycled water for landscape irrigation, and using on-site gray water and rainwater collection systems. Therefore, the CAP Update would not result in demand for new or expanded infrastructure, including water, wastewater treatment, stormwater drainage, natural gas or telecommunication facilities would not increase to serve new population or development.

The implementation of the CAP Update would incrementally increase electricity consumption, for example through measures that increase the installation zero emission infrastructure (Measure T-8), consume energy more efficiently within buildings and water systems (Measures E-3.1, E-3.2, E-4.2 E-6, and W-2), and install solar carports (Measure E-3.3). However, as discussed in the San Diego Gas and Electric Company (SDG&E)'s Integrated Resource Plan, SDG&E has existing plans in place to solicit additional long-term renewable contracts, including conventional and long-duration storage technologies (SDG&E 2022). The CAP Update's support for using more renewable energy and more efficient natural gas consumption would decrease demand for natural gas infrastructure.

The implementation of the CAP Update would not involve development of residential communities or other non-residential development or induce population growth in an area that would increase demand for wastewater treatment. Further, it would not involve the construction of restroom facilities. Implementation of the CAP Update would not result in new habitable structures (e.g., housing, nonresidential development) that would generate wastewater, therefore, implementation of the CAP Update would not exceed the capacity of any wastewater treatment provider.

Implementation of the CAP Update would not induce increased residential or non-residential development, or population growth directly or indirectly, and there would be no increase in solid waste production as a result of the CAP Update. Although some solid waste could be generated during construction activities or through retrofitting buildings (Measure E-6), the solid waste generated would be minimal due to the nature of construction activities and associated improvements, and therefore would not exceed the capacity of local facilities. Measure WD-1 includes strategies to continue to increase the diversion of waste from landfills, which is consistent with and would further State solid waste statutes and goals. Therefore, solid waste generated as a result of the CAP Update would not be generated in excess of local standards or capacity of local infrastructure.

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Conclusion

There are no changes in circumstances or new information of substantial importance that would require major revisions to the 2024 SEIR or result in new significant effects or a substantial increase in the severity of previously identified effects related to utilities and service systems. The 2024 SEIR did not identify significant utilities and service systems impacts and did not identify mitigation measures. The CAP Update would not result in any new or substantially more severe significant impacts related to utilities and service systems.

Applicable Mitigation Measures from the SEIR

There are no mitigation measures from the 2024 SEIR identified to reduce impacts related to utilities and service systems.

Wildfire

SEIR Evaluation Criteria	SEIR Significance Conclusion	SEIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent SEIR Needed?					Project is within the Scope of the SEIR?
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?	Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))		
Would implementation of the CAP Update:								
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	Less than Significant	None	No	No	No	Yes	Yes	
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	Less than Significant	None	No	No	No	Yes	Yes	
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel brakes, emergency water sources, power lines or other utilities) that may result in temporary or ongoing impacts to the environment?	Less than Significant	None	No	No	No	Yes	Yes	

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SEIR Evaluation Criteria	SEIR Significance Conclusion	SEIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent SEIR Needed?				Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15164(a) Occur?	Project is within the Scope of the SEIR?
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?		
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?		Less than Significant	None	No	No	No	Yes	Yes

Previous CEQA Analysis Wildfire Findings

The 2024 SEIR identified less than significant impacts for wildfire emergency response, access, and evacuation (WF-1); and related to slope, prevailing winds, and other factors that could exacerbate wildfire risks, installation or maintenance of associated infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment, exposing people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes; and exposing people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires (WF-2) (Section 4.15, Wildfire).

Addendum Analysis

The implementation of the CAP Update would result in short-term and long-term changes related to wildfire as described below.

Implementation of the CAP Update would result in alterations of public roadways. The CAP Update measures and actions would include improvements at or near grade level of existing roadways, new and upgraded bikeways and walkways along existing developed roadways and rights-of-way in the city, and the installation of roundabouts or traffic circles to control traffic within the intersections of existing developed roadways (through implementation of Measures T-1, T-4, T-5, and T-8). However, these improvements would not adversely affect the capacity of roadways during an emergency or evacuation. New Class II bike lanes and Class II buffered bike plans implemented per Measure T-4 would be separately from vehicle lanes using paint and therefore would not impede the movement of emergency vehicles or vehicles during an evacuation event. CAP Update Measure T-1, which encourages the installation of roundabouts, would reduce congestion, thus increasing traffic flow and the ability to evacuate during an emergency. Therefore, implementation of the CAP Update would not impair or interfere with adopted emergency response or evacuation plans.

Although the city is located within a Local Responsibility Area Very High Fire Hazard Severity Zone and adjacent to a State Responsibility Area Very High Fire Hazard Severity Zone, the CAP Update measures and actions would not include the construction of new housing and do not propose changes to policies or regulations related to land use or residential zoning. The CAP Update would not introduce new occupants that could be exposed to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire or require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities). Action CS-1.a would continue implementation of the existing Community Forest Management Plan and therefore the CAP Update would not result in changes to the types of trees planted within fire hazard severity zones. Furthermore, activities associated with implementation of the CAP Update measures would comply with the San Diego County Emergency Operations Plan (EOP) and be subject to the California Fire Code (CFC), which includes safety measures to minimize the threat of fire. Implementation of the CAP Update would also be required, where applicable, to meet CBC requirements, including CCR Title 24, Part 2, which includes specific requirements related to exterior wildfire exposure. Impacts related to downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes would be reduced by compliance with the CBC and CMC, as well as applicable policies from the Public Safety Element Update (policies 6-P.20 through 6-P.31). Compliance with applicable policies, codes and regulations would reduce the risk of loss, injury, or death from wildfire and the CAP Update would not exacerbate wildfire risks.

Climate Action Plan Update

Conclusion

There are no changes in circumstances or new information of substantial importance that would require major revisions to the 2024 SEIR or result in new significant effects or a substantial increase in the severity of previously identified effects related to wildfire. The 2024 SEIR did not identify significant wildfire impacts and did not identify mitigation measures. The CAP Update would not result in any new or substantially more severe significant impacts related to wildfire.

Applicable Mitigation Measures from the SEIR

There are no mitigation measures from the 2024 SEIR identified to reduce impacts related to wildfire.

7 References

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