Project No.-675395

Draft Program Enviromental Impact Report for the Utilities Undergrounding Program

SCH# 2018101037
April 2025

The City of SAN DIEGO

Prepared for:

City of San Diego
Utilities Undergrounding Program
San Diego, CA

Prepared by:

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The City of SAN DIEGO
City Planning Department
Environmental Policy & Public Spaces Division

DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT

SCH No. 2018101037

SUBJECT: UTILITIES UNDERGROUNDING PROGRAM ENVIRONMENTAL IMPACT REPORT

Applicant: City of San Diego City Planning Department

DRAFT DOCUMENT: April 16, 2025

PROJECT DESCRIPTION:

The City of San Diego (City) Transportation Department is implementing the Utilities Undergrounding Program (Project) to systematically convert overhead utility lines, including power distribution lines, telephone lines, cable lines, and other communications lines, to underground within City limits. The overall Project is governed by the California Public Utilities Commission, Council Policy 600-08, and the San Diego Municipal Code. The City's Utilities Undergrounding Program Master Plan (Master Plan), developed in 2003 and last updated in 2018, guides future work of the Project. The Master Plan is the governing document for how the Project will execute its future work. The Master Plan outlines the geographic boundary, estimated cost, and other parameters for future undergrounding projects to be implemented under the Project. The goals of the Master Plan are to align with Council Policy 600-08 for the Project, improve planning efficiency and accuracy, prioritize projects with the greatest public benefit, reduce neighborhood impact, and simplify public interface with the Project. The implementation of proposed activities would occur based on a prioritization system developed by the City and would be implemented as individual districts become ready for creation and as funding allows. The process to deliver an undergrounding project under the Project is a collaborative effort between the City and the utility companies that consists of a five-stage process: district creation, design, pre-construction activities, undergrounding construction, and post-undergrounding improvements. The City has addressed permitting and environmental compliance activities on a project-by-project basis to date. This Program Environmental Impact Report (PEIR), prepared in conformance with the California Environmental Quality Act (CEQA) and CEQA Guidelines (Public Resources Code Section 21000 et seq. and 14 CCR Section 15000 et seq., respectively) is intended to programmatically address potential environmental impacts associated with undergrounding projects implemented under the Project. These impacts are analyzed to the extent feasible at this time; however, additional project-level CEQA analysis and/or new or amended permits may be required for undergrounding projects prior to implementation.

PROJECT LOCATION:

The City of San Diego (City) is on the Pacific Ocean coastline in Southern California approximately 12 miles north of the United States–Mexico international border in the County of San Diego (County). The City's land area covers nearly 372 square miles and is home to a population of roughly 1.4 million people. The City is bordered to the north by the City of Del

Mar, the City of Poway, and unincorporated County land. To the east, the City is bordered by the Cities of Santee, El Cajon, La Mesa, and Lemon Grove, as well as unincorporated County land. The Project would result in the undergrounding of approximately 1,000 miles of overhead utility lines throughout the City. Land uses vary throughout the City. Major transportation corridors within the City include several interstates and state routes managed by the California Department of Transportation, rail lines, bus service, and trolleys. The Project area is located within the San Diego Air Basin (SDAB) of the San Diego County Air Pollution Control District.

ENVIRONMENTAL DETERMINATION:

The purpose of this document is to inform decision-makers, agencies, and the public of the significant environmental effects that could result if the project is approved and implemented, identify possible ways to minimize the significant effects, and describe a reasonable range of alternatives to the project.

Based on the analysis conducted for the project described above, the City of San Diego has prepared the following Draft PEIR in accordance with CEQA. The analysis conducted identified that the proposed project could result in significant and unavoidable impacts in the areas of **Historical, Cultural, and Tribal Cultural Resources and Noise**. All other impacts analyzed in this Draft PEIR were found to be less than or not significant.

This document has been prepared by the City of San Diego's City Planning Department and is based on the City's independent analysis and determinations made pursuant to Section 21082.1 of the California Environmental Quality Act (CEQA) and Section 128.0103(a) and (b) of the San Diego Municipal Code.

RESULTS OF PUBLIC REVIEW:

( ) No comments were received during the public input period.

( ) Comments were received but did not address the accuracy or completeness of the draft environmental document. No response is necessary, and the letters are incorporated herein.

( ) Comments addressing the accuracy or completeness of the draft environmental document were received during the public input period. The letters and responses are incorporated herein.

Rebecca Malone

Rebecca Malone, Program Manager
City Planning Department

April 16, 2025
Date of Draft Report

Analyst: G.Johansen

Date of Final Report

PUBLIC REVIEW DISTRIBUTION:

The following agencies, organizations, and individuals received a copy or notice of the Draft PEIR and were invited to comment on its accuracy and sufficiency. Copies of the Draft PEIR and any technical appendices may be reviewed in the office of the City Planning Department or purchased for the cost of reproduction.

FEDERAL GOVERNMENT
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for the
Utilities Undergrounding Program
San Diego, California
SCH No. 2018101037
Project No. 675395

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ACRONYMS AND ABBREVIATIONS

Acronym/Abbreviation	Definition
AB	Assembly Bill
ADA	Americans with Disabilities Act
ADC	alternative daily cover
ADT	average daily traffic
ALUCP	Airport Land Use Compatibility Plan
AME	Archaeological Monitoring Exhibit
APE	area of potential effect
APRM	Advanced Permittee Responsible Mitigation
AUF	acoustical usage factor
BAU	business as usual
BCME	Biological Construction Mitigation/Monitoring Exhibit
BI	Building Inspector
BMP	best management practice
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emissions Estimator Model
CALGreen	California Green Building Standards
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CARB	California Air Resources Board
CAT	Climate Action Team
CCA	California Coastal Act
CCC	California Coastal Commission
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CDP	Coastal Development Permit
CDPH	California Department of Public Health
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CFC	chlorofluorocarbon
CFR	Code of Federal Regulations
CH_4	methane
CIP	Capital Improvement Program
City	City of San Diego

Acronym/Abbreviation	Definition
CM	Construction Manager
CNEL	Community Noise Equivalent Level
CNRA	California Natural Resources Agency
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
County	County of San Diego
COZ	coastal zone
CP600-08	Council Policy 600-08
CPUC	California Public Utilities Commission
CRHR	California Register of Historical Resources
CRMTP	Cultural Resources Monitoring and Treatment Plan
CRPR	California Rare Plant Rank
CSVR	Consultant Site Visit Record
CWA	Clean Water Act
dB	decibel
dBA	A-weighted decibel
DPM	diesel particulate matter
DPR	Department of Parks and Recreation
DSD	Development Services Department
EAS	Environmental Analysis Section
ECP	Engineering & Capital Projects Department
ED	Environmental Designee
EIR	Environmental Impact Report
EIS	Environmental Impact Statement
EO	Executive Order
EP	Environmental Protocol
EPA	Environmental Protection Agency
ESA	Endangered Species Act
ESL	environmentally sensitive lands
EV	electric vehicle
FAR	floor-area ratio
FHWA	Federal Highway Administration
FMMP	Farmland Mapping and Monitoring Program
FR	Federal Register
FTA	Federal Transit Administration
GHG	greenhouse gas

Acronym/Abbreviation	Definition
GIS	geographic information system
GWP	global warming potential
HAP	hazardous air pollutant
HCFC	hydrochlorofluorocarbon
HCM	Highway Capacity Manual
HFC	hydrofluorocarbon
HMMP	Habitat Mitigation and Monitoring Plan
HRA	health risk assessment
I	Interstate
INRMP	Integrated Natural Resources Management Plan
IPCC	Intergovernmental Panel on Climate Change
ips	Inches per second
LCD	Landscape Construction Document
LDC	Land Development Code
L_{dn}	day-night sound level
LEED	Leadership in Energy and Environmental Design
L_{eq}	equivalent sound level
$L_{eq(1h)}$	1-hour A-weighted equivalent sound level
LOS	level of service
LRDP	Long Range Development Plan
Ma	million years ago
Master Plan	Utilities Undergrounding Program Master Plan
MBTA	Migratory Bird Treaty Act
MCAS	Marine Corps Air Station
MHPA	Multi-Habitat Planning Area
MLD	Most Likely Descendant
MM	Mitigation Measure
MMC	Mitigation Monitoring Coordination
MMRP	mitigation monitoring and reporting program
MMT	million metric tons
MRZ	Mineral Resource Zone
MSCP	Multiple Species Conservation Program
MT	metric ton
MTS	Metropolitan Transit System
N_2O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission

Acronym/Abbreviation	Definition
NCFUA	North City Future Urbanizing Area
NF_3	nitrogen trifluoride
NHPA	National Historic Preservation Act
NHTSA	National Highway Traffic Safety Administration
NIEHS	National Institute of Environmental Health Sciences
NO	nitric oxide
NO_2	nitrogen dioxide
NOP	Notice of Preparation
NO_x	oxides of nitrogen
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
NSLU	noise-sensitive land use
O_2	oxygen
O_3	ozone
OPLA–PRP	Omnibus Public Lands Act–Paleontological Resources Preservation
OPR	Governor's Office of Planning and Research
OSHA	Occupational Safety and Health Administration
PC	Project Contractor
PCE	passenger car equivalent
PEIR	Program Environmental Impact Report
PFC	perfluorocarbon
PI	Principal Investigator
PM	Project Manager
PM_{10}	particulate matter less than or equal to 10 microns in diameter
$PM_{2.5}$	particulate matter less than or equal to 2.5 microns in diameter
PPA	Public Project Assessment
ppm	parts per million
PPV	peak particle velocity
PQB	Principal Qualified Biologist
PRC	Public Resources Code
Project	Utilities Undergrounding Program
RAQS	Regional Air Quality Strategy
RCNM	Roadway Construction Noise Model
RCP	Regional Comprehensive Plan
RE	Resident Engineer
RIC	Revegetation Installation Contractor
RMC	Revegetation Maintenance Contractor

Acronym/Abbreviation	Definition
ROW	right-of-way
RPS	Renewables Portfolio Standard
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
SAFE-1	Safer Affordable Fuel-Efficient Vehicles Rule Part One: One National Program
SANDAG	San Diego Association of Governments
SanGIS	San Diego Geographic Information Source
SANTEC/ITE	San Diego Traffic Engineer's Council/Institute of Transportation Engineers
SB	Senate Bill
SCAQMD	South Coast Air Quality Management District
SCH	Office of Planning and Research's State Clearinghouse
SCIC	South Coastal Information Center
SCS	Sustainable Communities Strategy
SDAB	San Diego Air Basin
SDAPCD	San Diego County Air Pollution Control District
SDBG	City of San Diego Municipal Code, Land Development Code—Biology Guidelines
SDG&E	San Diego Gas & Electric Company
SDMC	San Diego Municipal Code
SDNHM	San Diego Natural History Museum
SDP	Site Development Permit
SF_6	sulfur hexafluoride
SHPO	State Historic Preservation Office
SIP	State Implementation Plan
SJVAPCD	San Joaquin Valley Air Pollution Control District
SO_2	sulfur dioxide
SO_x	sulfur oxides
SR	State Route
SWPPP	Stormwater Pollution Prevention Plan
TAC	toxic air contaminant
TCP	traffic control permit
TCR	tribal cultural resource
TPA	Transit Priority Area
TSM	Transportation Study Manual
UNFCCC	United Nations Framework Convention on Climate Change
USACE	U.S. Army Corps of Engineers

Acronym/Abbreviation	Definition
USC	United States Code
USFWS	U.S. Fish and Wildlife Service
UUD	Underground Utility District
V/C	volume-to-capacity ratio
VdB	vibration velocity decibel
VMT	vehicle miles traveled
VOC	volatile organic compound
VPHCP	Vernal Pool Habitat Conservation Plan
WPCP	Water Pollution Control Plan
WRCC	Western Regional Climate Center
ZEV	zero-emissions vehicle

EXECUTIVE SUMMARY

ES-1 INTRODUCTION

The City of San Diego (City) Transportation Department is implementing the Utilities Undergrounding Program (Project) to systematically convert overhead utility lines, including power distribution lines, telephone lines, cable lines, and other communications lines, to underground within City limits. It does not include electric transmission lines, which are regulated by the California Public Utilities Commission (CPUC). The City began undergrounding utilities lines in 1970 and has completed more than 400 miles of undergrounding projects to date. More than 400 miles of overhead utilities have been converted to underground, with approximately 1,000 miles of overhead utility lines remaining, and as such, the Project is expected to continue for many years.

The overall Project is governed by the CPUC, Council Policy 600-08, and the San Diego Municipal Code. The City's Utilities Undergrounding Program Master Plan (Master Plan), developed in 2003 and last updated in 2018, guides future work of the Project. The Master Plan is the governing document for how the Project will execute its future work. The Master Plan outlines the geographic boundary, estimated cost, and other parameters for future undergrounding projects to be implemented under the Project. In addition, the City's annual budget, particularly the Transportation Department's section, provides important details about the Project. The budget includes yearly actual miles completed and targeted miles completed. The budget also gives information about all expenditures in the previous fiscal year of the Project and the planned expenditure budget of the next fiscal year. The goals of the Master Plan are to align with Council Policy 600-08 for the Project, improve planning efficiency and accuracy, prioritize projects with the greatest public benefit, reduce neighborhood impact, and simplify public interface with the Project.

The City has addressed permitting and environmental compliance activities on a project-by-project basis to date. This Program Environmental Impact Report (PEIR), prepared in conformance with the California Environmental Quality Act (CEQA) and CEQA Guidelines (Public Resources Code Section 21000 et seq. and 14 CCR Section 15000 et seq., respectively) is intended to programmatically address potential environmental impacts associated with undergrounding projects implemented under the Project. These impacts are analyzed to the extent feasible at this time; however, additional project-level CEQA analysis and/or new or amended permits may be required for undergrounding projects prior to implementation.

ES-2 PROJECT DESCRIPTION, OBJECTIVES, AND LOCATION

Project Description Summary

The proposed activities under the Project would consist of the systematic conversion of overhead utilities to underground throughout the City. The implementation of proposed activities would occur

based on a prioritization system developed by the City and would be implemented as individual districts become ready for creation and as funding allows.

The process to deliver an undergrounding project under the Project is a collaborative effort between the City and the utility companies that consists of a five-stage process: district creation, design, pre-construction activities, undergrounding construction, and post-undergrounding improvements. Please refer to Chapter 3, Project Description, of this PEIR for a detailed description of activities associated with each stage of the undergrounding process.

Objectives

The following outlines the primary objectives of the Project and reflects the goals delineated in the Master Plan:

1. Convert overhead utilities to underground when City Council determines it is in the interest of public health, safety, and welfare of the general public
2. Align with Council Policy 600-08 for the Project
3. Improve individual project and region-wide planning efficiency and accuracy
4. Prioritize undergrounding projects with the greatest public benefit
5. Reduce impacts to neighborhoods and communities within the City
6. Simplify public interface with the Project

Project Location

Activities associated with implementation of the Project would be located within the City's geographic boundaries and jurisdiction. In rare instances, proposed activities may also occur in limited areas adjacent to City boundaries when needed to complete a connection or circuit.

ES-3 FUTURE ENVIRONMENTAL REVIEW FOR PROJECT- AND PROGRAM-LEVEL ACTIVITIES

Approvals needed for the conversion of overhead utilities to underground include City Council approval for the creation of each district and Development Services Department approval of ministerial Right-of-Way Permits for construction activities. A Site Development Permit and/or Coastal Development Permit may be needed for districts where sensitive resources are located.

This document is a PEIR, as defined in CEQA Guidelines Section 15168. A PEIR is prepared for a series of actions that are characterized as one large Project due to geography or similar rules or regulations or where individual activities will occur under the same regulatory process with similar environmental

impacts that can be mitigated in similar ways. Implementation of the Project will occur over time by converting certain areas of the City from overhead to underground utilities. At this time, the scope of each individual undergrounding project to be implemented under the Project is not precisely defined; however, potential environmental impacts can be estimated at the program level, and a mitigation strategy has been developed that would apply to future improvements. When individual undergrounding projects (i.e. project-specific districts) are prioritized and selected for implementation, the City can approve the activity without additional environmental documentation if the activities are determined to be adequately analyzed in this PEIR. If additional analysis is required, it can be streamlined by tiering from this PEIR pursuant to CEQA Guidelines Sections 15152, 15153, and 15168 (e.g., through preparation of a Mitigated Negative Declaration, Addendum, or Supplemental or Subsequent Environmental Impact Report [EIR]).

ES-4 SUMMARY OF ENVIRONMENTAL EFFECTS AND MITIGATION

As discussed in Chapters 4, Environmental Analysis, and Chapter 6, Environmental Effects Not Found to be Significant, the following issue areas were determined to result in no impact or a less-than-significant impact: air quality, agriculture and forestry resources, energy, geology and soils, greenhouse gas emissions, health and safety, hydrology and water quality, land use, mineral resources, paleontological resources, population and housing, public services, recreation, transportation, utilities/service systems (excluding solid waste), solid waste, and visual effects and neighborhood character.

As discussed in Chapter 4, the Project would result in potentially significant impacts to the following issue areas: biological resources; historical, archaeological, and tribal cultural resources; and noise. Table ES-1 summarizes the impacts determined to be significant as analyzed in this PEIR.

Table ES-1
Summary of Significant Environmental Impacts

Impact	Mitigation Measures	Level of Significance After Mitigation
Biological Resources		
Issue 1: Sensitive Species – Quantification of potentially significant direct and indirect impacts to sensitive species resulting from utility undergrounding activities proposed under the Project as Category 2 and 3 projects requires evaluation of site-specific factors to ensure that mitigation measures are adequately observed at the time of project implementation, as appropriate. Potential project-level impacts related to modifications of habitat suitable for sensitive species would be **potentially significant.**	**MM-BIO-1** (Biological Resource Protection During Construction), **MM-BIO-2** (Handling of Non-Native Invasive Plant Species), **MM-BIO-3** (MSCP/MHPA – Land Use Adjacency Guidelines), **MM-BIO-4** (Species-Specific Sensitive Plant Mitigation), and **MM-BIO-5** (Avoidance of Listed Species Take)	Less than significant
Issue 2: Tier I, II, IIIA, or IIIB Habitats or Other Sensitive Natural Community – Proposed quantification of potential project-level impacts resulting from construction activities at Category 2 or 3 utilities would require an on-site evaluation by a qualified biologist in order to determine the location of Tier I, II, or III habitat boundaries, the potential for proposed activities to affect these habitats, and the mitigation measures that would be required, if any. Should any unplanned Project-level impacts to these sensitive vegetation communities (i.e., Tiers I–III, which could also support sensitive wildlife) occur, they would be **potentially significant.**	**MM-BIO-1** (Biological Resource Protection During Construction), **MM-BIO-2** (Handling of Non-Native Invasive Plant Species), **MM-BIO-3** (MSCP/MHPA – Land Use Adjacency Guidelines), **MM-BIO-6a** (Compensatory Wetlands Mitigation), and **MM-BIO-6b** (Compensatory Uplands Mitigation)	Less than significant
Issue 3: Wetlands – Project activities could be conducted at Category 2 or 3 projects that occur within wetland or riparian habitat. Work at these utility locations would require an on-site evaluation by a qualified biologist in order to determine the quantity and location of any wetlands (including non-wetland waters) and ensure avoidance. Should any unplanned impacts occur to wetlands within Category 2 or 3 utilities,	**MM-BIO-1** (Biological Resource Protection During Construction), **MM-BIO-2** (Handling of Non-Native Invasive Plant Species), **MM-BIO-3** (MSCP/MHPA – Land Use Adjacency Guidelines), **MM-BIO-6a** (Compensatory Wetlands	Less than significant

Table ES-1
Summary of Significant Environmental Impacts

Impact	Mitigation Measures	Level of Significance After Mitigation
including areas under the jurisdiction of USACE, RWQCB, and CDFW, those would be **potentially significant.**	Mitigation), and **MM-BIO-7** (Vernal Pool Avoidance, Minimization, and Mitigation)	
Issue 5: Conflict with HCP, NCCP or Other – There is potential for individual Category 3 (located within the MHPA) undergrounding projects to come forward that would conflict with the MSCP and therefore result in a **potential significant impact.**	**MM-BIO-1** (Biological Resource Protection During Construction), **MM-BIO-2** (Handling of Non-Native Invasive Plant Species), **MM-BIO-3** (MSCP/MHPA – Land Use Adjacency Guidelines), **MM-BIO-4** (Species-Specific Sensitive Plant Mitigation), **MM-BIO-5** (Avoidance of Listed Species Take), **MM-BIO-6a** (Compensatory Wetlands Mitigation), **MM-BIO-6b** (Compensatory Uplands Mitigation), and **MM-BIO-7** (Vernal Pool Avoidance, Minimization, and Mitigation)	Less than significant
Issue 6: Within and Adjacent to MHPA – Because there are undergrounding projects and utilities within the Project that would occur within and adjacent to the MHPA (Category 3 only), the Project is required to document compliance with the MSCP Land Use Adjacency Guidelines and Section 5.2 of the VPHCP. In addition, there is potential for construction activities to result in short-term adverse edge effects to the MHPA at Category 3 projects, which would be **potentially significant.**	**MM-BIO-1** (Biological Resource Protection During Construction), **MM-BIO-3** (MSCP/MHPA – Land Use Adjacency Guidelines), and **MM-BIO-7** (Vernal Pool Avoidance, Minimization, and Mitigation)	Less than significant

Table ES-1
Summary of Significant Environmental Impacts

Impact	Mitigation Measures	Level of Significance After Mitigation
Issue 8: Introduction of Invasive Species – There is a potential for construction activities for Category 2 and 3 projects to result in the introduction of invasive species plants into a natural open space area, which would be **potentially significant.**	**MM-BIO-1** (Biological Resource Protection During Construction) and **MM-BIO-2** (Handling of Non-Native Invasive Plant Species)	Less than significant
Historical, Archaeological, and Tribal Cultural Resources		
Issue 1: Historical Resources – The City's historical resources review process reduces potential impacts to historical resources due to trenching; installation of new transformers, cable boxes, and pedestals; and attachment of new electrical service panels to a level that is less than significant. Therefore, only staging areas, removal of pole connection appurtenances, and removal and installation of streetlamps have the potential to create a **potentially significant** impact to historical resources.	**MM-HR-1** (Identification of Historical Resources) and **MM-HR-2** (Project Design)	Significant and unavoidable
Issue 2: Archaeological Resources – If a particular installation activity or entire phase does not have the potential to impact a cultural resource, then the activity does not require further cultural resource management. Phase III, Cut-overs, is the only phase that does not have potential to impact cultural resources. If an activity does have the potential to impact a cultural resource within a specific project footprint, impacts would be **potentially significant**, and some level of cultural resource management is required through implementation of mitigation. It is possible for the same activity to be exempt from further management for one undergrounding project while requiring further management for another undergrounding project under the Project.	**MM-CR-1** (Archaeological and Tribal Cultural Resources)	Significant and unavoidable

Table ES-1
Summary of Significant Environmental Impacts

Impact	Mitigation Measures	Level of Significance After Mitigation
Issue 3: Human Remains – Project activities that would include ground disturbance have potential to impact human remains; therefore, impacts would be **potentially significant**.	**MM-CR-1** (Archaeological and Tribal Cultural Resources)	Significant and unavoidable
Tribal Cultural Resources		
Issue 1: Tribal Cultural Resources – If an activity has the potential to impact a tribal cultural resource within a specific project footprint, impacts would be **potentially significant**, and some level of tribal cultural resource management is required through implementation of mitigation. It is possible for the same activity to be exempt from further management for one undergrounding project while requiring further management for another undergrounding project under the Project.	**MM-CR-1** (Archaeological and Tribal Cultural Resources)	Significant and unavoidable
Noise		
Issue 1: Increase in Ambient Noise Level/Construction Noise – Temporary construction noise impacts from project-level activities conducted under the Project would be **potentially significant.**	**MM-NOI-1** (Construction Noise Reduction Measures)	Significant and unavoidable
Issue 4: Groundborne Vibration – Groundborne vibration resulting from operation of some construction equipment types would result in excessive vibration exposure levels when occurring very close to residential homes, fragile structures (e.g., historic resources), or buildings within which operation of vibration-sensitive instruments and processes occur. Therefore, the impact would be **potentially significant**.	No feasible mitigation measures	Significant and unavoidable

Notes: Project = Utilities Undergrounding Program; MM = Mitigation Measure; USACE = U.S. Army Corps of Engineers; RWQCB = Regional Water Quality Control Board; CDFW = California Department of Fish and Wildlife; HCP = habitat conservation plan; NCCP = natural community conservation plan; MHPA = Multi-Habitat Planning Area; MSCP = Multiple Species Conservation Program; VPHCP = Vernal Pool Habitat Conservation Plan; City = City of San Diego.

ES-5 AREAS OF KNOWN CONTROVERSY

CEQA Guidelines Section 15123(b)(3) requires that an environmental impact report address issues to be resolved, including the choice among alternatives and whether or how to mitigate significant impacts. With regard to the Project, the major issues to be resolved include decisions by the lead agency as to:

1. Whether this Program Environmental Impact Report (PEIR) adequately describes the environmental impacts of the Project.
2. Whether the benefits of the Project override the environmental impacts that cannot be feasibly avoided or mitigated to below a level of significance.
3. Whether there are any alternatives to the Project that would substantially lessen any of the significant impacts of the Project and achieve most of the basic Project objectives. In accordance with CEQA Guidelines Section 15123(b)(2), the PEIR summary must identify areas of controversy known to the lead agency, including issues raised by agencies and the public.

Prior to preparation of the PEIR, the Notice of Preparation was distributed for public review on October 15, 2018. Agency letters and public comments received in response to the Notice of Preparation (see Appendix A of this PEIR) included requests to address historical and archaeological resources, traffic and transportation, future required permits, and other general considerations for implementation of the Project.

ES-6 ALTERNATIVES SELECTED FOR CONSIDERATION

For a summary of alternatives eliminated from detailed consideration, refer to Chapter 7, Alternatives, of this PEIR. The following is a summary of the alternatives selected for consideration during the scoping and planning process.

No Project: No Action

The No Project: No Action Alternative would involve the City discontinuing the Project. While the Project would be discontinued, it is expected that undergrounding would continue to occur privately when property owners implement frontage improvements or publicly when the City implements roadway improvements. Undergrounding and maintenance activities would include the same methods as described for the Project in Sections 3.5, Proposed Utilities Undergrounding Program, and 3.6, Operation and Maintenance, of this PEIR.

This alternative would not meet most of the basic project objectives, as it would not result in the active undergrounding of utilities (Objective 1), align with Council Policy 600-08 (Objective 2), improve undergrounding planning (Objective 3), or prioritize undergrounding with public benefit (Objective 4). It would reduce impacts to the neighborhoods and communities (Objective 5) and

simplify public interface (Objective 6), as undergrounding activities would be reduced and the Project's public interfacing would be eliminated. While this alternative would not meet the majority of project objectives, it is none-the-less analyzed further due to the CEQA requirement to address a no project alternative (see Section 7.2.4, Required Alternatives).

Reduced Cultural and Biological Resources Impact Alternative

The intent of the Reduced Cultural and Biological Resources Impact Alternative would be to avoid or reduce significant direct and indirect impacts to cultural and biological resources known to be present. Within the anticipated districts within the City, these resources are primarily in undeveloped areas where native vegetation and soils have not been previously disturbed. While the Project would generally avoid direct impacts to cultural and biological resources by not trenching and tunneling in undisturbed/open areas, this alternative would limit all Project activities, including pole removal, to outside areas with known sensitive resources to avoid potential indirect impacts. Additionally, undergrounding activities in areas within 500 feet of a Multi-Habitat Planning Area would be limited to outside the breeding season. Generally speaking, this alternative would be limited to undergrounding projects in previously developed and disturbed areas of the City that are also not adjacent to known cultural resources, areas deemed moderately high and highly sensitive to cultural resources, or sensitive biological resources. Undergrounding projects would be prioritized first based on the avoidance of resources and subsequently based on the criteria in Council Policy 600-08. Undergrounding and maintenance activities would include the same methods as described for the Project in Sections 3.5 and 3.6 of this PEIR. However, despite reducing the scale of undergrounding, implementation of this alternative would likely be prolonged due to avoidance of construction in the breeding season.

The Reduced Cultural and Biological Resources Impact Alternative would meet the majority of project objectives, as it would meet four of the six project objectives. More specifically, this alternative would include undergrounding utilities that would benefit the public pursuant to project Objective 1. While this alternative would align with the majority of Council Policy 600-08 requirements and criteria, it would prioritize the avoidance of cultural and biological resources over those criteria listed in the policy and over public benefit. Thus, this alternative would not meet Objective 2 or 4. This alternative would be consistent with Objectives 3, 5, and 6, as it would include master planning of utility improvements, continue to reduce impacts to neighborhoods and communities, and simplify public interface via master planning. Overall, the Reduced Cultural and Biological Resources Impact Alternative meets the majority of the project objectives.

Project alternatives are discussed in Chapter 7.

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1 INTRODUCTION

This Program Environmental Impact Report (PEIR) has been prepared by the City of San Diego (City) to evaluate potential environmental effects that would result from implementation of the Utilities Undergrounding Program (Project). The Project includes the systematic conversion of overhead utilities to underground throughout the City. The implementation of proposed activities would occur based on a prioritization system developed by the City and outlined in the 2018 Utilities Undergrounding Program Master Plan (Master Plan), Council Policy 600-08, and the electric franchise agreement, all of which govern how projects and activities will be executed. In addition to the undergrounding projects in the 2018 Master Plan, this PEIR also analyzes 13 additional undergrounding projects (see Table 3-1 in Chapter 3, Project Description, of this PEIR) that were allocated from the 2009 Master Plan but had not yet completed environmental review in accordance with the California Environmental Quality Act (CEQA).

This PEIR has been prepared in conformance with the CEQA statutes (PRC Section 21000 et. seq., as amended) and implementing guidelines (14 CCR 15000 et seq.). The City acts as the lead agency, and the City's Transportation Department is the applicant and sponsor of this Project.

1.1 CALIFORNIA ENVIRONMENTAL QUALITY ACT PROJECT OBJECTIVES

The following outlines the primary objectives of the Project:

1. Convert overhead utilities to underground when City Council determines it is in the interest of public health, safety, and welfare of the general public
2. Align with Council Policy 600-08 for the Project
3. Improve individual project and region-wide planning efficiency and accuracy
4. Prioritize undergrounding projects with the greatest public benefit
5. Reduce impacts to neighborhoods and communities within the City
6. Simplify public interface with the Project

1.2 CALIFORNIA ENVIRONMENTAL QUALITY ACT REQUIREMENTS AND PURPOSE OF THE PROGRAM ENVIRONMENTAL IMPACT REPORT

In accordance with CEQA Guidelines Section 15121, the purpose of this PEIR is to provide public agency decision-makers and members of the public with detailed information about the potential significant environmental effects of the Project, possible ways to minimize its significant effects, and reasonable alternatives that would reduce or avoid any identified significant effects. The PEIR includes recommended mitigation measures, which—when implemented—would lessen Project

impacts and provide the City with ways to substantially lessen or avoid the significant effects of the Project on the environment.

This document is a PEIR, as defined in CEQA Guidelines Section 15168. A PEIR is prepared for a series of actions that are characterized as one large project due to geography or similar rules or regulations or where individual activities will occur under the same regulatory process with similar environmental impacts that can be mitigated in similar ways. Implementation of the Project will occur over time by converting certain areas of the City from overhead to underground utilities. At this time, the scope of each individual project to be implemented under the Project is not precisely defined; however, potential environmental impacts can be estimated at the program level, and a mitigation strategy has been developed that would apply to future improvements. When project-specific plans are available, the City can approve the activity without additional environmental documentation if the activities are determined to be adequately analyzed in this PEIR. If additional analysis is required, it can be streamlined by tiering from this PEIR pursuant to CEQA Guidelines Sections 15152, 15153, and 15168 (e.g., through preparation of a Mitigated Negative Declaration, Addendum, or Supplemental or Subsequent Environmental Impact Report [EIR]).

1.2.1 ENVIRONMENTAL IMPACT REPORT LEGAL AUTHORITY

The City is the lead agency as defined by CEQA Section 21067. The lead agency "has the principal responsibility for carrying out or approving a project which may have a significant effect upon the environment" (PRC Section 21067). This document complies with the criteria, standards, and procedures of CEQA (PRC Section 21000 et. seq.) and the State CEQA Guidelines (14 CCR 15000 et seq.). Further, this document has been prepared as a PEIR pursuant to CEQA Guidelines Section 15168. This PEIR has also been prepared in accordance with the City's EIR Guidelines (City of San Diego 2005) and the City's CEQA Significance Determination Thresholds (City of San Diego 2022). Certain responsible and trustee agencies may also have jurisdiction over projects carried out under the Project as described below.

U.S. Army Corps of Engineers. Pursuant to Section 404 of the Clean Water Act, the U.S. Army Corps of Engineers (USACE) regulates the discharge of dredged and/or fill material into "waters of the United States." The term "wetlands" (a subset of waters) is defined in 33 Code of Federal Regulations (CFR) 328.3(c) as "those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas." In the absence of wetlands, the limits of USACE jurisdiction in non-tidal waters, such as intermittent streams, extend to the "ordinary high-water mark," which is defined in 33 CFR 328.3(c)(4). Direct impacts to sensitive vegetation communities (i.e., Tier I–III and Wetlands) and jurisdictional aquatic resources, including resources that may support sensitive species, are expected to be minimal and limited to foot traffic access only; however, should

unplanned activities occur within "waters of the United States" as regulated by USACE, coordination and permits may be required.

California Department of Fish and Wildlife. Under state law, the California Department of Fish and Wildlife (CDFW) regulates activities that may alter the bed, banks, or floor of any watercourse/stream, pursuant to California Fish and Game Code Section 1600 et seq. CDFW also administers the California Endangered Species Act under Section 2050 et seq. The Project may result in the placement of certain utilities underground that cross a CDFW jurisdictional area or impact a species covered under the California Endangered Species Act.

California Department of Transportation. The Project may affect facilities within the jurisdiction of the California Department of Transportation (Caltrans). Although the Project does not include construction permits, Caltrans approval would be required for any encroachments or future construction of facilities in a Caltrans right-of-way (refer to Caltrans comment letter on the Notice of Preparation [NOP], included in Appendix A). This potential impact is discussed in Section 4.8, Transportation, of this PEIR.

California Coastal Commission. The California Coastal Commission has regulatory authority within the state Coastal Zone subject to the Coastal Act unless a local jurisdiction has a state-certified Local Coastal Program. The Project may occur within areas of the Coastal Zone subject to the state of California's jurisdiction as well as the City's certified Local Coastal Program.

San Diego County Air Pollution Control District. The County Board of Supervisors sits as the board of the San Diego County Air Pollution Control District (SDAPCD), which regulates sources of air pollution in the county. This is accomplished through monitoring, engineering, and compliance divisions within the SDAPCD, designed to protect the public from the adverse impacts of polluted air.

San Diego Regional Water Quality Control Board. The Regional Water Quality Control Board regulates water quality through the Section 401 certification process and oversees the National Pollutant Discharge Elimination System Permit No. CAS0109266, which consists of wastewater discharge requirements. The permit is expected to be updated over the project implementation time period covered by this PEIR. Projects implemented under the PEIR may require approval for activities that result in discharges into waterbodies.

1.2.2 NOTICE OF PREPARATION AND SCOPING MEETING

In accordance with the CEQA Guidelines, the City, as lead agency under CEQA, prepared and distributed an NOP on October 15, 2018, to all responsible and trustee agencies, as well as various governmental agencies (including the Office of Planning and Research's State Clearinghouse) and interested individuals pursuant to CEQA Section 15087(a). The purpose of the NOP was to provide notification that the City plans to prepare a PEIR and to solicit input on the scope and content of the

PEIR. Nine written comment letters were received on the NOP from various agencies, organizations, and individuals. Consistent with CEQA Section 21083.9 and CEQA Guidelines Section 15082, a public scoping meeting was held by the City Planning Department on Tuesday, October 23, 2018, from 5:30 p.m. to 7:30 p.m. in the auditorium at the San Diego Public Utilities Department. Six people attended the meeting and provided input regarding the environmental issues and concerns that may potentially result from the Project. The NOP and public scoping meeting comments received are included as Appendix A of this PEIR.

Verbal and written comments received during the scoping process have been taken into consideration during the preparation of this PEIR. An outline of the issues noted during the scoping process is contained in the Areas of Known Controversy discussion in the Executive Summary. The environmental conditions evaluated as the baseline in this PEIR are those that existed at the time the NOP was circulated as described in Chapter 2, Environmental Setting.

1.2.3 PROGRAM ENVIRONMENTAL IMPACT REPORT ADEQUACY

The level of detail contained throughout this PEIR is consistent with CEQA Guidelines Section 15151, which states the following:

> An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of the environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure.

1.2.4 PROGRAM ENVIRONMENTAL IMPACT REPORT AND PUBLIC REVIEW

In accordance with CEQA Guidelines Section 15105, this PEIR is being circulated for public review and comment for a period of 45 days. The purpose of the review period is to allow the public an opportunity to provide comments "on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided and mitigated" (14 CCR 15204). In accordance with CEQA Guidelines Sections 15085 and 15087(a)(1), upon completion of the PEIR, a Notice of Completion will be filed with the State Clearinghouse and a Notice of Availability of the PEIR will be issued in a newspaper of general circulation in the area. The public review period will be from April 16th, 2025, through June 1st , 2025. The PEIR and all supporting technical studies and documents are available for review at the City

Planning Department, 202 C Street, 5th floor, San Diego, California 92101. An electronic copy of the PEIR and the technical appendices are posted on the City's website at www.sandiego.gov/ceqa/draft.

During the public review period, comments from the general public, organizations, and agencies may be submitted to the lead agency through regular mail to the following address or via email to the email address below:

Greg Johansen
City of San Diego
202 C Steet, M.S. 413, 5th floor
San Diego, California 92101
Email: PlanningCEQA@sandiego.gov

General questions about this PEIR and the EIR process should also be directed to the email address above. The City will prepare written responses to all comments pertaining to environmental issues raised in the PEIR if they are submitted in writing and postmarked by the last day of the public review period identified in the Notice of Availability.

1.3 PROGRAM ENVIRONMENTAL IMPACT REPORT FORMAT

The scope of analysis for this PEIR was determined by the City as a result of initial project review and consideration of comments received in response to the NOP and scoping meeting. Through the NOP and scoping activities, the City determined that the scope of the PEIR would address the following technical issue areas:

- Air Quality and Odor
- Biological Resources
- Greenhouse Gas Emissions
- Historical, Archaeological, and Tribal Cultural Resources
- Land Use
- Noise
- Paleontological Resources
- Transportation
- Solid Waste

This PEIR is organized as follows:

The Executive Summary of the PEIR is provided at the beginning of this document. This summary outlines the conclusions of the environmental analysis and provides a summary of the Project and the alternatives analyzed in the PEIR. This section also includes a table summarizing all environmental impacts identified in this PEIR along with the associated mitigation measures proposed to reduce or avoid each impact.

Chapter 1, Introduction, serves as a foreword to this PEIR, introducing the Project, the applicable environmental procedures, and the organization of the PEIR.

Chapter 2, Environmental Setting, provides a description of the Project's regional context, location, and existing physical characteristics and land use within the Project area. An overview of available public infrastructure and services as well as the Project's relationship to relevant plans is also provided in this section. The environmental setting is intended, in part, to constitute the baseline physical conditions based on which the PEIR determines whether an impact is significant.

Chapter 3, Project Description, provides a thorough description of the Project elements, the purpose and need for the Project, Project objectives, and required discretionary approvals. This chapter also includes a description of the intended uses of the PEIR and public agency actions.

Chapter 4, Environmental Analysis, describes the potential environmental effects of the Project, as well as proposed mitigation measures to reduce or avoid any potentially significant impacts. The discussion in Chapter 4 is organized by nine environmental issue areas as follows:

- Air Quality and Odor
- Biological Resources
- Greenhouse Gas Emissions
- Historical, Archaeological, and Tribal Cultural Resources
- Land Use
- Noise
- Paleontological Resources
- Transportation
- Solid Waste

For each environmental issue area, the analysis and discussion are organized into nine subsections as described below:

Introduction – This subsection introduces the environmental issue area and the topics discussed within the section.

Existing Conditions – This subsection describes the physical environmental conditions in the vicinity of the Project at the time of publication of the NOP. The environmental setting establishes the baseline conditions by which the City will determine whether specific Project-related impacts are significant.

Regulatory Setting – This subsection describes the regulatory setting applicable to the environmental issue area and the Project at the time of publication of the NOP.

Thresholds of Significance – This subsection identifies a set of thresholds by which the level of impact is determined. Thresholds that were eliminated from further review in the PEIR as part of the Initial Study analysis will be identified here.

Approach and Methodology – This subsection, when applicable, describes the approach and methodology used to assess impacts.

Impacts – This subsection provides a detailed analysis regarding the environmental effects of the Project and whether the impacts of the Project would meet or exceed the established significance criteria.

Significance of Impacts – This subsection discusses whether Project-related impacts would be reduced to below a level of significance with implementation of the mitigation measures identified in the PEIR. If applicable, this subsection also identifies any residual significant and unavoidable adverse effects of the Project that would result even with implementation of mitigation measures.

Mitigation, Monitoring, and Reporting – This subsection identifies potentially feasible mitigation measures that would avoid or substantially reduce significant adverse Project impacts.

Significance After Mitigation – This subsection discusses the level of significance of impact resulting from the Project after incorporation of mitigation measures, if any.

Chapter 5, Cumulative Impacts, identifies the cumulative impacts of the Project in combination with other past, planned, and probable future development in the region.

Chapter 6, Environmental Effects Found Not To Be Significant, provides a description of issues that were found to have no impact and a rationale for why they need not be addressed further in this PEIR.

Chapter 7, Alternatives, discusses alternatives to the Project, including a No Project Alternative. This chapter describes the rationale for selecting the range of alternatives discussed in the PEIR and identifies the alternatives considered by the City that were rejected from further discussion as infeasible during the scoping process. Lastly, Chapter 7 includes a discussion of the environmental effects of the alternatives that were carried forward for analysis and identifies the environmentally superior alternative.

Chapter 8, Mandatory Discussion Areas, addresses significant environmental effects that cannot be avoided, the significant irreversible environmental changes that would result from implementation of the Project, and growth-inducing impacts associated with the Project.

Chapter 9, Mitigation Monitoring and Reporting Program, identifies the mitigation measures from Chapter 4 that would reduce environmental impacts associated with implementation of the Project.

Chapter 10, References, includes the various materials, documents, and resources referenced throughout this PEIR.

Chapter 11, Individuals Consulted/Preparers, gives names and contact information of those responsible for writing this PEIR.

Appendices include various technical studies prepared for the Project, as listed in the Table of Contents.

Incorporation by Reference

As permitted by CEQA Guidelines Section 15150, this PEIR has referenced several technical studies and reports. Information from these documents has been briefly summarized in the analysis contained in this PEIR. These documents are included in Chapter 10 and are hereby incorporated by reference. They are available for review at the City Planning Department, located at 202 C Street, 5th Floor, San Diego California 92101. Included within the list of materials incorporated by reference into this PEIR are the following: *City of San Diego General Plan* (2024a), *City of San Diego Program Environmental Impact Report for the General Plan* (Final PEIR) (2024b), *City of San Diego Mission Bay Park Master Plan* (as amended in 2021), City of San Diego Municipal Code (2008).

1.4 DISCRETIONARY ACTIONS

As lead agency, the City Planning Department has the authority to implement CEQA and is responsible for the environmental review and analysis of discretionary projects. Environmental review will be conducted in accordance with the City's adopted *California Environmental Quality Act Significance Determination Thresholds* (City of San Diego 2022). Approvals needed for the conversion of overhead utilities to underground include City Council approval of the creation of each district and Development Services Department approval of ministerial right-of-way permits for construction activities. In addition, a site development permit (issued by the City) and/or coastal development permit (issued either by the City or California Coastal Commission) may be needed for districts where sensitive resources are located.

1.5 SUBSEQUENT APPROVALS

Subsequent project-level and program-level activities that are consistent with the Project would be evaluated under CEQA Guidelines Section 15162 with the certified PEIR. This evaluation would determine whether to prepare a subsequent environmental document, an addendum, or no further documentation. Per CEQA Guidelines Section 15152, when a certified EIR adequately addresses significant environmental effects, subsequent projects are encouraged to tier off the certified EIR.

2 ENVIRONMENTAL SETTING

This chapter provides a "description of the physical environmental conditions in the vicinity of the [Utilities Undergrounding Program (Project)]…as they exist at the time the notice of preparation is published…from both a local and a regional perspective" (14 CCR 15125[a]), pursuant to the provisions of the California Environmental Quality Act (CEQA) and the CEQA Guidelines. The environmental setting provides the baseline physical conditions from which the lead agency will determine the significance of environmental impacts resulting from the Project. In each environmental topic area, a more detailed environmental setting description relevant to that particular topic area is provided.

2.1 REGIONAL LOCATION

The City of San Diego (City) is on the Pacific Ocean coastline in Southern California approximately 12 miles north of the United States–Mexico international border in the County of San Diego (County). The City's land area covers nearly 372 square miles and is home to a population of roughly 1.4 million people. The City is bordered to the north by the City of Del Mar, the City of Poway, and unincorporated County land. To the east, the City is bordered by the Cities of Santee, El Cajon, La Mesa, and Lemon Grove, as well as unincorporated County land. The Project would result in the undergrounding of approximately 1,000 miles of overhead utility lines throughout the City. The Project area and districts are shown on Figure 2-1, Program Location.

2.2 PHYSICAL CHARACTERISTICS AND LAND USE

Detailed information relevant to each resource area is presented in Chapter 4. This section provides a high-level overview of the City's very diverse physical characteristics and land use. Geography ranges from coastal beaches to rolling hills and canyons farther inland. Historically, the Project area has been subjected to ground shaking, as is most of seismically active Southern California. The climate is mild, hovering between the mid-60s in winter months to the mid-70s in summer months.

Land uses vary throughout the City. In fact, the City acknowledges 52 distinct communities within City limits. Northern portions of the City, such as Fairbanks Ranch, maintain a rural feel with rolling topography and open space, while Pacific Beach has a distinctive beach town vibe and Downtown/Centre City is a hub of business and tourism. San Diego also has a rich cultural and historic heritage.

Major transportation corridors within the City include several interstates and state routes managed by the California Department of Transportation, rail lines, bus service, and trolleys. These are also some of the primary noise sources within the Project area. The City also has a developed bicycle network that comprises bike paths, bike lanes, and bike routes. Walking facilities are classified within the City as one of seven types: district sidewalks, corridor sidewalks, connector sidewalks,

neighborhood sidewalks, ancillary pedestrian facilities (such as plazas, paseos, promenades, courtyards, or pedestrian bridges and stairways), path, and trails.

The Project area is located within the San Diego Air Basin (SDAB) of the San Diego County Air Pollution Control District. SDAB is one of 15 air basins that geographically divides California. SDAB is currently classified as a federal nonattainment area for ozone (O_3) and a state nonattainment area for particulate matter less than 10 microns, particulate matter less than 2.5 microns, and O_3.

While much of San Diego is developed or urbanized, a rich diversity of plant and animal life remain in the more natural areas. Areas of rare vegetation communities such as coastal sage scrub flourish subject to the Multiple Species Conservation Program. Wildlife corridors provide access to resources such as food, water, and shelter, and animals use these corridors to move between different habitats. Regional corridors provide these functions, as well as linking two or more large habitat areas. Regional corridors provide avenues for wildlife dispersal, migration, and contact between otherwise distinct populations. Figure 2-2 depicts the Multi-Habitat Planning Area, and Figure 2-3 depicts watersheds, waters, and the Coastal Zone boundary within the Project area.

Public services within the City are provided by multiple service providers, including Metropolitan Water District of Southern California (water supply and distribution), City municipal services (wastewater, water treatment, fire protection and emergency services, police, one landfill), the San Diego Gas & Electric Company (electricity and natural gas), and Allied Waste Industries (two landfills).

2.3 APPLICABLE LAND USE PLANS AND REGULATIONS

The following planning documents and regulations are applicable to the Project and are further discussed throughout Chapter 4, Environmental Analysis, of this PEIR, including Section 4.2, Biological Resources; Section 4.3, Greenhouse Gas Emissions; Section 4.4, Historical, Archaeological, and Tribal Cultural Resources; Section 4.5, Land Use; and Section 4.8, Transportation:

- *City of San Diego General Plan*
- *City of San Diego Municipal Code*
- *Community, Local Coastal Program, and Park Master Plans*
- *City of San Diego Bicycle and Pedestrian Master Plan*
- *City of San Diego Climate Action Plan*
- *City of San Diego Multiple Species Conservation Program Subarea Plan*
- *City of San Diego Vernal Pool Habitat Conservation Plan*
- *City of San Diego Environmentally Sensitive Lands Regulations*

- *City of San Diego Coastal Development Permit Procedures*
- *City of San Diego Historical Resources Guidelines*

The City acknowledges 52 distinct communities within City limits, as shown on Figure 2-4, Community Planning Areas. Each of these communities has a community plan addressing many issue areas including, but not limited to, land uses, recreation, transportation, public facilities, and open space.

Land Development Code

The San Diego Municipal Code Chapters 11 through 15 contain the City's Land Development Code (LDC). The LDC contains the City's planning, zoning, subdivision, and building regulations that regulate how land is to be developed and organized within the planning area. The LDC includes overlay and base zones; specifies permitted land use, density, and floor-area ratio; and provides other development requirements for given zoning classifications. The LDC also includes specific regulations for general development, environmentally sensitive lands, historical resources, coastal development permit requirements, stormwater runoff and drainage regulations, discharge control, and others. Regulations pertaining to a specific use may be referenced in the LDC.

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City of San Diego
Coastal Zone
Undergrounding Districts

SOURCE: DigitalGlobe 2017

0 7,500 15,000 Feet

FIGURE 2-1

Program Location

City of San Diego Utilities Undergrounding Program - Program Environmental Impact Report

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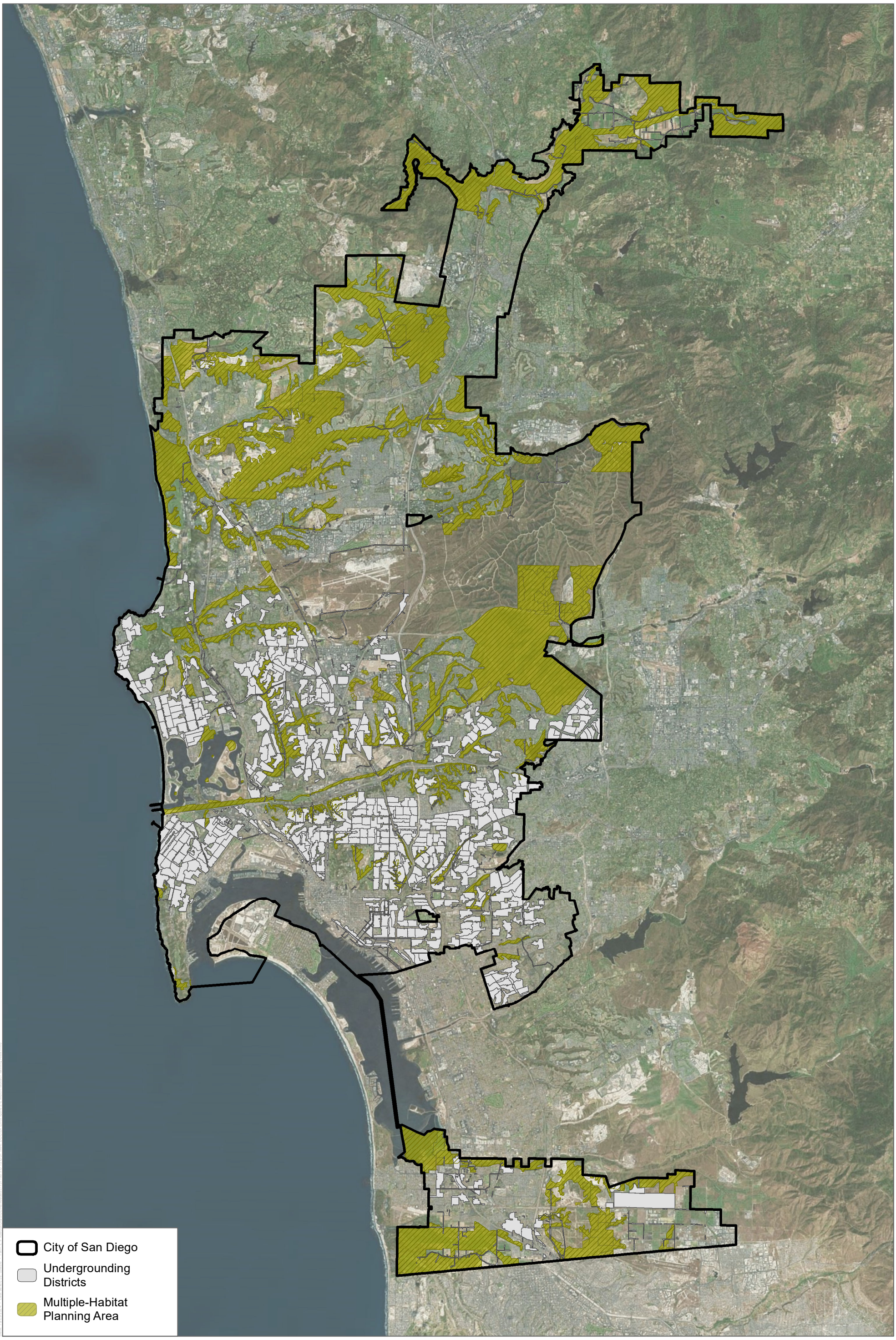

SOURCE: Bing Maps 2018

0 7,500 15,000 Feet

FIGURE 2-2

Multi-Habitat Planning Area

City of San Diego Utilities Undergrounding Program - Program Environmental Impact Report

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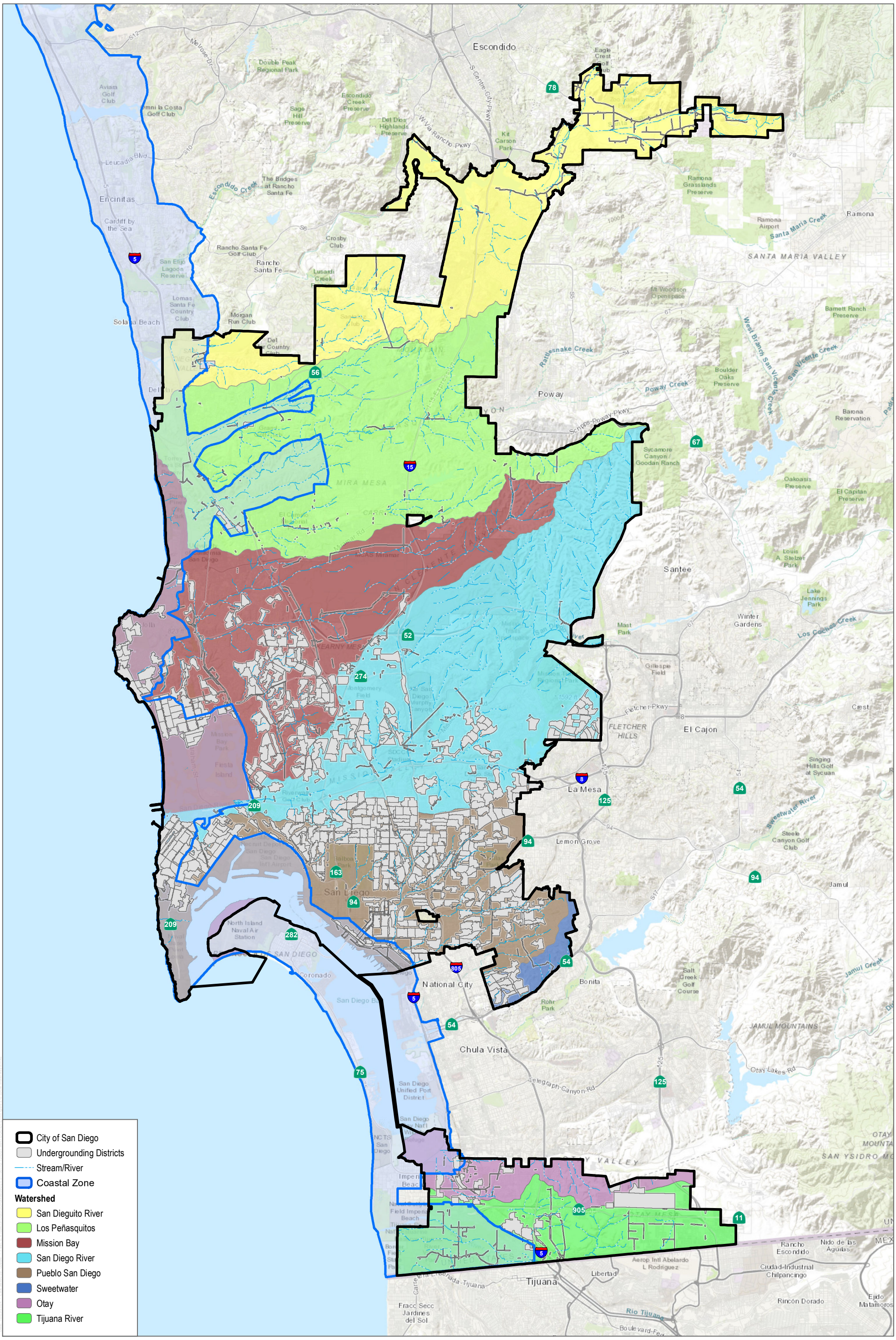

SOURCE: DigitalGlobe 2017

FIGURE 2-3

Local Waterways

City of San Diego Utilities Undergrounding Program - Program Environmental Impact Report

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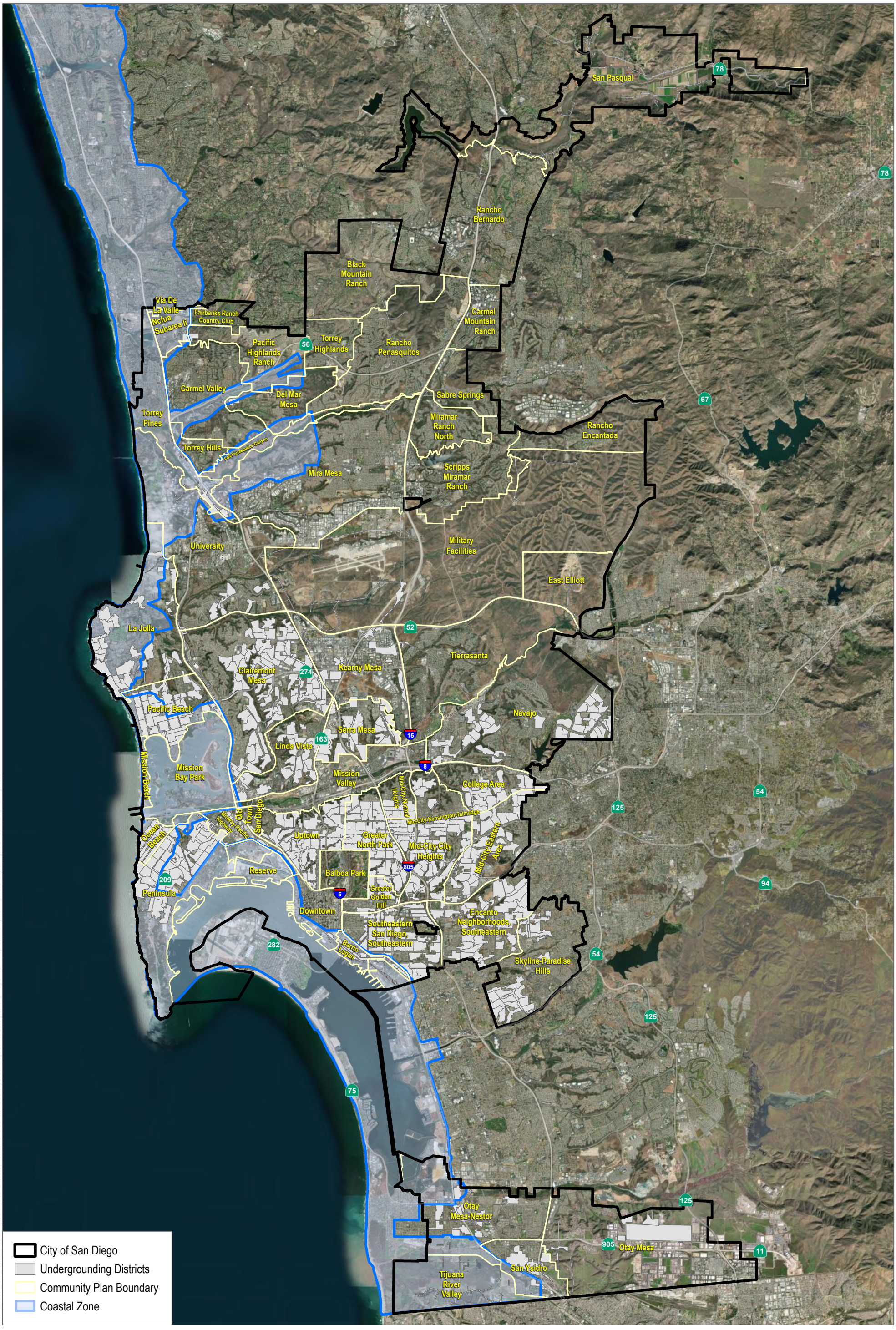

SOURCE: Maxar 2022

0 1.25 2.5 Miles

FIGURE 2-4

Community Planning Areas

City of San Diego Utilities Undergrounding Program - Program Environmental Impact Report

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3 PROJECT DESCRIPTION

This chapter provides a description of the Utilities Undergrounding Program (Project), the environmental effects of which are evaluated in Sections 4.1 through 4.9 of this Program Environmental Impact Report (PEIR). The project location, history, purpose and need, and objectives are described immediately below, followed by a description of Project characteristics and a summary of the discretionary actions that would be required. California Environmental Quality Act (CEQA) Guidelines Section 15124 set forth specific technical requirements for the Project description and includes items such as the precise location of the Project, a statement of the Project's objectives, and a general description of the Project's technical and environmental characteristics.

3.1 PROJECT LOCATION

The land area of the City of San Diego (City) covers nearly 372 square miles and is in the southwestern corner of California, within the County of San Diego. Activities associated with implementation of the Project would be within the City's geographic boundaries and jurisdiction. In rare instances, proposed activities may also occur in limited areas adjacent to City boundaries when needed to complete a connection or circuit. The location of utility undergrounding districts is shown in Figure 2-1, Program Location.

3.2 UTILITIES UNDERGROUNDING PROGRAM BACKGROUND

In 1967, the California Public Utilities Commission (CPUC) issued Decision 73078, which established rules for electric and communication utility service connections and overhead conversions. Decision 73078 also created tariff rules, titled Rule 20, which mandated that utilities allocate funds annually for the conversion of existing overhead utility lines to underground. Part A of Rule 20 required local electric utilities to fund the conversion of overhead electric lines that meet the criteria of focusing on high-traffic densities and tourism areas. However, CPUC Decision 21-06-013 discontinued the allocation of new Rule 20A work credits (funding) after December 31, 2022.

In 2002, the CPUC approved an additional mechanism (CPUC Energy Division Resolution E-3788) for funding and executing undergrounding work within the City jurisdiction to improve public safety, community character, and visual quality. A Surcharge Fund was established by applying an underground surcharge component to residents' electric bills, managed separately from the City's General Fund. The Surcharge program also funds street resurfacing, curb ramps, streetlights, and street trees within each undergrounding project boundary. Council Policy 600-08 was established to guide the management of funds and execution of projects under this new funding mechanism. In addition, Chapter 06, Article 01, Division 05 of the San Diego Municipal Code (SDMC), Underground Utilities Procedural Ordinance, includes details on the undergrounding process, including interaction with the City Council, responsibilities to residents, and overall undergrounding requirements and

definitions. Since the termination of the Rule 20A program, the Surcharge program is now the only funding mechanism for implementing undergrounding projects.

The first Utilities Undergrounding Program Master Plan (Master Plan) was developed in 2003. Projects were divided by Council Districts, which were then broken into smaller utilities undergrounding districts. Implementation of the Project is managed by the City's Transportation Department in coordination with the City's Engineering & Capital Projects Department (ECP) and Development Services Department (DSD), the City's electric utility franchisee (currently San Diego Gas & Electric Company [SDG&E]), and the telecommunication utilities that provide telephone, cable television, and broadband services throughout the City. The Transportation Department's team manages the programming, budgeting, and execution of projects and ensures the utility partners are delivering on their obligations to support the process. On average, the City coordinates the undergrounding of approximately 15 miles of overhead utility lines each year. As of July 2024, a total of approximately 460 miles of overhead utilities have been converted to underground, with approximately 1,000 miles of overhead utility lines remaining (Redmond, pers. comm., 2024). It is the largest program of its kind in the state of California and one of the larger and more complex programs in the City due to the number of entities involved and the comprehensive nature of improvements.

3.3 PROJECT OBJECTIVES

The following are the primary objectives of the Project:

1. Convert overhead utilities to underground when City Council determines it is in the interest of public health, safety, and welfare of the general public
2. Align with Council Policy 600-08 for the Project
3. Improve individual project and region-wide planning efficiency and accuracy
4. Prioritize undergrounding projects with the greatest public benefit
5. Reduce impacts to neighborhoods and communities within the City
6. Simplify public interface with the Project

3.4 OVERVIEW OF EXISTING OVERHEAD UTILITIES

The CPUC provides regulation and oversight for private companies to own and operate utilities throughout California. Local ordinances have required new development to install utilities underground since 1970, and provisions exist within both the CPUC and local ordinances to facilitate the conversion of overhead utilities to underground in areas that were developed prior to 1970. Electrical utilities within the City's jurisdiction are currently provided exclusively by SDG&E through a franchise agreement that includes a Memorandum of Understanding for utilities undergrounding.

Telecommunication providers do not have a franchise agreement with the City but are mandated by the municipal code to participate in the City undergrounding program.

The existing utilities system consists of both overhead and underground infrastructure that is owned and maintained by private utility companies within public lands that the City manages. Most of that land is dedicated street right-of-way. Overhead utility lines include electric transmission and distribution lines, as well as telecommunications lines, which are located on the same poles when feasible.[1] Some utility poles are owned by the telecommunication companies, but the majority are owned by SDG&E, who in turn leases space to several utility companies that provide telephone, cable TV, and broadband utilities.

3.5 PROPOSED UTILITIES UNDERGROUNDING PROGRAM

The proposed activities under the Project would consist of the systematic conversion of overhead utilities to underground throughout the city, with the exception of the Carmel Mountain Ranch Community Plan Area. The implementation of proposed activities would occur based on a prioritization system developed by the City and would be implemented as individual Underground Utility Districts (UUDs) become ready for creation as funding allows.

3.5.1 UTILITIES UNDERGROUNDING PROGRAM MASTER PLAN

The Master Plan was developed to help guide the allocation of undergrounding projects for the duration of the Project. The Master Plan outlines the geographic boundary, estimated cost, and other parameters for future projects covering all areas in the City where undergrounding is needed. The Master Plan focuses on undergrounding power distribution lines, telephone lines, cable lines, and other communications lines. It does not include transmission lines, most areas outside the City limits, or areas that have already been undergrounded. The goals of the Master Plan are to align with Council Policy 600-08 for the Project, improve planning efficiency and accuracy, prioritize projects with greatest public benefit, reduce neighborhood impact, and simplify public interface with the Project.

For the purposes of this PEIR, the term “district” defines the geographic boundary within which an undergrounding project would be constructed; as such, the site boundaries of a utility undergrounding “district” are the same as that of an “undergrounding project.” The term “undergrounding project” constitutes an overhead alignment to be undergrounded/constructed. Each undergrounding project then consists of multiple individual “utilities” (i.e., specific pole and

[1] Electric transmission lines may be undergrounded if they need replacement and/or are in areas where distribution lines have already been undergrounded; however, that is determined on a case-by-case basis subject to CPUC approval and is beyond the scope of this PEIR.

trench locations). Under the Master Plan, each undergrounding project was assigned a ranking for when they would be undergrounded, and a cost estimate.

In 2009, the Master Plan was updated using geographic information system software that allowed for a more detailed analysis of projects and provided similar details to the 2003 Master Plan.

The Master Plan was updated again in 2018 to provide new cost and schedule estimates and create a new methodology for communicating more realistic cost and schedule information. This 2018 Master Plan takes unallocated projects from the 2009 Master Plan and divides them up into smaller, more manageable projects. Due to the discontinuation of the CPUC Rule 20A program, the boundaries of Surcharge projects as currently delineated in the 2018 Master Plan will be revised to incorporate in part, or in whole, adjacent former Rule 20A projects.

In addition to the undergrounding projects in the 2018 Master Plan, this PEIR also analyzes 13 additional undergrounding projects (Table 3-1) that were allocated from 2009 Master Plan but had not yet completed environmental review in accordance with CEQA. These undergrounding projects were already submitted to the DSD and City Planning Department for review through the City's Public Project Assessment (PPA) process and determined to have a potential for impacting archaeological and tribal cultural resources. After certification of this PEIR, each of these 13 undergrounding projects that move forward to City Council for district formation will be covered by the analysis in this PEIR and will be required to implement the appropriate mitigation measures.

Table 3-1
13 Remaining Undergrounding Projects from 2009 Master Plan

Project ID	Project Name	Community Planning Area
UU78	Soledad Road	Pacific Beach/La Jolla
UU182	Residential Block 4W	Skyline-Paradise Hills
UU190	Cable Street Phase 1	Ocean Beach
UU310	Residential Block 1A	La Jolla
UU339	Cable Street Phase 2	Ocean Beach
UU407	Residential Block 2D3	Uptown
UU599	India Street	Uptown
UU660	Residential Block 1B	La Jolla
UU827	Residential Block 8Q	Otay Mesa-Nestor
UU76	Sorrento Valley Road	Torrey Pines
UU852	Residential Block 2F	Old Town/Uptown
UU157	Residential Block 2K	Peninsula
UU588	El Camino Real	North City Future Urbanizing Area/Fairbanks Ranch Country Club

3.5.2 UTILITIES UNDERGROUNDING PROCESS

The process to deliver an undergrounding project is a collaborative effort between the City and the utility companies and includes the following steps:

- District Creation
- Design
- Pre-Construction Activities
- Undergrounding Construction (including post-undergrounding improvements)

District Creation Process

After the City completes a PPA and CEQA review for an individual undergrounding project, or processes site/coastal development (or agency permits) if project-specific impacts requiring such approvals are known at district creation, the City Council holds a public hearing to establish a UUD for each project. This creates an overlay that restricts utility companies from installing new aboveground utility lines within each district boundary (excluding electric transmission lines, which are regulated by the CPUC). All residents and property owners within a district are mailed a public hearing notice and a map of the proposed area to be converted to underground. The notice describes possible impacts to property owners during design, construction, and post-construction activities. Any member of the public may attend and speak at the public hearing. After the City Council approves the UUD, all property owners within the district are sent a copy of the Council Resolution and a map of the newly established district.

Design Process

Following the establishment of a UUD, a 12- to 24-month design process would commence. If project-specific impacts were not known at district creation that required site/coastal development or agency permits those would be obtained. During this time, a pre-design community forum would also be held with residents and property owners, including a presentation on what to expect throughout the design and construction phases. Property owners and community members would be able to communicate their concerns and preferences to the design teams to help guide decisions about utility box and streetlight locations associated with the utility overhead to underground conversion. This would also provide an opportunity for community members to express any concerns or questions regarding new street tree planting associated with a particular undergrounding project.

The design phase would include an examination of existing underground utility infrastructure that would be mapped prior to construction to ensure implementation of the undergrounding work would not interfere or conflict with existing utility systems and services in the area. This phase also provides the opportunity for coordination with other City departments working in the same

area in order to follow the City's "One Dig" approach to minimize neighborhood disturbance, adhere to Street Preservation Ordinance (O-19215) SDMC Section 62.1204 – Markouts, and reduce costs. In addition, projects within the coastal zone are subject to the City's summer beaches construction moratorium.

During the design phase, engineers would mark the street to demarcate where specific construction-related activities would occur, surveyors would perform field surveys, and other design professionals would coordinate with property owners to plan the construction on private property to connect homes and businesses to the underground lines.

Once the design for the subject district is 90% complete, property owners would be invited to a pre-construction community forum to provide information about what to expect in upcoming months. In addition, property owners can give input on the location of utility boxes and streetlights in areas where design flexibility remains.

Pre-Construction Activities

Prior to commencement of construction activities, property owners would receive a letter and "Permission to Enter" form authorizing permission for crews to perform construction on private property that is necessary for connection to the new underground utility service.

After the Permission to Enter form is signed and returned to the City, the existing electric service panel on each property is inspected by City inspectors to determine if it is in compliance with SDMC Section 146.0202(c). If the panel is not in compliance with the current code, the property owner will be allowed time to hire an electrical contractor to perform any corrections needed to bring the panel into compliance and obtain a building permit if required.

Once the property's electric panel is in compliance, a permit is required for the electrical modifications needed to convert from overhead to underground service. City inspectors would apply for the conversion permit, and when the application is processed, DSD would review the historic status of the structure. If it is a designated historic building, the application is sent to Historical Resources staff at DSD to review the proposed conversion, including the location of a new electrical box (if necessary), placement of exterior conduit, and location of a service trench. Proposed plans would be modified as necessary in accordance with applicable requirements for the preservation of historic structures.

Construction Process

Construction of new underground utility systems consists of six phases: trenching/boring and conduit installation, cabling and connection, cut-overs, removal of overhead equipment and poles, post-undergrounding improvements, and street restoration. The construction process for an

individual project under the UUP would typically occur over an approximate 63-month period that includes both construction and post-construction phases, with construction work conducted Monday through Friday between 7:30 a.m. and 4:00 p.m. (although work may occasionally take place at night or on weekends). Any construction work between 7:00 p.m. and 7:00 a.m. or on Sundays or holidays would require an approved noise permit and notification to residents and businesses within a 500-foot radius. Project construction would proceed in the order described below, although there could be some overlap of construction phases occurring in different parts of the undergrounding district. Construction could also temporarily pause due to unforeseen circumstances, which would extend the overall construction period beyond what is listed above or in the phases below. Construction crews would follow standard practices for notifying the public about upcoming construction that impacts streets and sidewalks (e.g., door hanger) approximately 3 weeks prior to the start of construction.

Phase I: Trenching/Boring and Conduit Installation

Trenching activities in the public right-of-way would involve open trenching techniques to create trenches approximately 2.5 feet wide and 5 feet deep to install duct banks containing round plastic conduit below the surface of the roadway or, in rare cases, the alley. In addition to the duct banks, pre-cast concrete underground hand holes (underground vaults) with traffic covers would be installed to facilitate pulling and splicing during construction, and also for inspection, maintenance, and repair activities during operation. The number and size of hand holes can vary depending on the configuration, size, and constraints of each district. Where overhead lines and poles exist in open space or sensitive habitat, the lines would be relocated to nearby roadways where trenching would occur. To the extent feasible, trenching would not occur within open space or sensitive habitat.

On average, approximately 100 feet of trenching and boring would be completed per day, resulting in approximately 50 cubic yards of excavation per day. Excavated materials would be tested and would be used as backfill if the material is determined to be suitable for reuse. If unanticipated soil and/or groundwater contamination are encountered, soil and/or groundwater would be tested, handled, and disposed of in accordance with City standards and applicable environmental laws and regulations.

Open trench lengths would not exceed what is required to facilitate the installation of the conduit. Where applicable, trenches would be widened and shored to meet California Occupational Safety and Health Administration safety requirements. If trench water is encountered during construction activities, trenches would be dewatered using a portable pump in accordance with regulations.

In addition to the work in the right-of-way, trenching or boring would be conducted up to each home and business to place conduit from the main line in the right-of-way to the structure to be

connected. Trenching or boring operations would typically not occur in front of any one home or business for more than a few days.

Although trenching or boring activities are not anticipated to result in road closures, some roads may be temporarily limited to one-way traffic under circumstances where construction activities and equipment staging cannot accommodate two-way traffic flow or may be limited to local traffic only during construction hours. A traffic control permit (TCP) is required for each project to ensure adequate and safe access is maintained during construction. The City and contractor would coordinate provisions for emergency vehicle and local access as necessary. Traffic control measures would be implemented, monitored, and controlled by construction personnel in accordance with the TCP. Steel plating would be placed over open trenches at the end of the workday to maintain vehicular and pedestrian circulation during times when active construction is not taking place. After the conduit is placed and the duct banks are completed, trenches would be backfilled and capped in accordance with the City's Street Preservation Ordinance in preparation for later street resurfacing.

This phase can be expected to last up to 24 months. Construction equipment typically required for trenching or boring would include air compressors, a directional drill (ditch witch), a concrete/industrial saw, a mini excavator (305E2), a small skid steer (289D), an excavator (305CR), a loader/backhoe, a mini roller, a plate compactor, a cement truck, and a dump truck and would require approximately 20 construction personnel on site. Staging of construction equipment during this phase would be located within the City's existing public right-of-way or on other developed or disturbed areas that may be City-owned or private property, depending on availability at each given site.

Phase II: Cabling and Connection

After installation of the conduit duct banks and hand holes, cables would be installed in the conduit. Each cable would be pulled through the conduit using a cable reel at one end and a pulling rig at the other end. A lubricant is applied to the cable to decrease friction during pulling. The cables are spliced at each hand hole along the route. This phase can be expected to last up to 16 months. Cabling would be performed separately by each utility (one electric and up to three telecommunication companies).

As part of this phase, new transformers, cable boxes, and pedestals would be installed aboveground in the parkway. These boxes are necessary for the underground system and cannot be placed underground for system reliability and safety reasons. In addition, utility poles may need to be installed or upgraded at the boundary of the district where determined necessary for the transition from the existing aerial system to the new underground system. These poles would be removed at a later time when the adjacent district is eventually undergrounded.

Construction equipment required during this phase would include up to three generator sets and would require approximately 12 construction personnel on site.

Phase III: Cut-Overs

Once a new underground system is in place and energized and all properties have been prepared to receive underground service, all properties would be switched over from the overhead lines to the new underground systems. This phase would typically take up to 2 months to complete and would require approximately eight construction personnel on site and up to three aerial lifts (i.e., bucket trucks).

Phase IV: Removal of Overhead Equipment and Poles

When all properties within a district have been switched over to the new underground system, the overhead systems would be de-energized and removed. Crews would dismantle the lines and hardware on existing poles using cranes and aerial man-lifts. Old poles would be pulled out of the ground and removed from the site using a truck-mounted crane and a line truck. The hole would then be backfilled, and the surface would be restored to grade to match the surrounding area. If the pole is inaccessible by truck or located in sensitive habitat, it would be cut at the base, cut into smaller pieces, and removed on foot. The base of the pole would be abandoned in place. Utility poles would be hauled off site for disposal at an approved facility. This phase would typically last up to 12 months.

Construction equipment required during pole removal would include two air compressors, two aerial lifts (bucket trucks), two truck-mounted cranes, a flatbed truck, and a cement truck and would require up to five construction personnel on site.

Phase V: Post-Undergrounding Improvements

Once the new underground utility lines are in place, the City would construct the following types of public improvements in accordance with the City's *Standard Specifications for Public Works Construction* (the "Whitebook"), SDMC Sections 62.1109–62.1110 and Land Development Code Section 142.0670(a)(1), which requires that specific street improvements be constructed to preserve historic design elements in specific neighborhoods, including the location, width, elevation, scoring pattern, texture, color, and material to the satisfaction of the City Engineer. In addition, historically significant concrete sidewalk stamps are sawcut and replaced in the same or a close location as determined by a qualified historic preservation consultant as required in the project-specific contract documents. This phase would last up to 7 months and would require up to 14 construction personnel on site.

Streetlights and Street Trees

Existing streetlights currently affixed to wooden utility poles would be replaced with standalone streetlights in accordance with the City's current streetlight standards. In many cases, this process would relocate lighting from their existing locations, and additional lighting would be added as needed. At locations where new streetlights cannot be installed until the existing overhead lines and poles are removed, there would be a temporary lapse in streetlight coverage while the old lines and poles are removed and the new streetlights are installed.

Reasonable effort would be made to avoid modification to or removal of existing street trees by requiring a consultation with the City's horticulturalist whenever a tree root greater than 2 inches in diameter must be pruned or removed. Occasionally, a tree may need to be removed for purposes of worker and public safety. To reduce the impact associated with tree removal (if needed), and to enhance neighborhood trees, the program would plant new street trees when the property owner signs an agreement to water and care for the tree until it becomes established. More information about this opportunity is provided to property owners through the mail prior to construction.

Equipment for streetlight and street tree installation would include a bobcat with an auger, two concrete/industrial saws, a jackhammer, an air compressor, a small crane, and a semi-trailer truck.

Curb Ramps

New pedestrian curb ramps would be installed where required by access law, allowing individuals with a disability to cross the street. Existing curb ramps may also be replaced, if necessary, to meet current City and Americans with Disabilities Act standards. At some locations, additional sidewalk and curb replacement may be included where necessary to create a transition to the ramp in compliance with access law. Construction equipment would include a concrete/industrial saw, a jackhammer, two air compressors, and a cement truck.

Phase VI: Street Restoration

Street pavement would be restored in accordance with the City's Street Preservation Ordinance. Restoration activities would vary depending on the type and condition of existing pavement, the availability of paving funds, and the applicable City policies and standards in place at the time of construction. Commonly, this restoration would include cold milling and asphalt concrete overlay work, and occasionally the pouring of new concrete panels.

Construction equipment for street restoration would include a backhoe, a front end loader, a cement truck, a street sweeper, a road marking paint applicator, a dump truck, and a 1-ton pick-up truck. This phase would require up to eight personnel on site and would occur for up to 2 months.

3.6 OPERATION AND MAINTENANCE

Utility companies would assume ownership of the underground system and perform routine preventative maintenance inspections as well as emergency procedures as needed. Aboveground components would be inspected annually for corrosion, misalignment, loose fittings, and other common problems. Overall operational activities would be less than present activities. The underground system would not require the activities associated with preventing and responding to downed utility lines associated with damage from high winds or fallen tree limbs. In addition, it would reduce the amount of tree trimming maintenance that is needed to keep branches from interfering with overhead lines.

3.7 PROJECT APPROVALS

Approvals needed for the conversion of overhead utilities to underground include City Council approval for the creation of each undergrounding district and DSD approval of ministerial right-of-way permits for construction activities. Refer to Sections 4.1 through 4.9 of this PEIR for other permits that may be needed for districts where sensitive resources are located or where other agencies have jurisdiction. Each individual undergrounding project would be reviewed and evaluated on a case-by-case basis in accordance with current requirements at the time they are selected to move forward.

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4.0 ENVIRONMENTAL ANALYSIS

Approach to the Environmental Analysis

This Program Environmental Impact Report (PEIR) evaluates and discloses the environmental impacts associated with the Utilities Undergrounding Program (Project), in accordance with the California Environmental Quality Act (CEQA) (PRC Section 21000 et seq.) and the State CEQA Guidelines (14 CCR15000 et seq.). Sections 4.1 through 4.9 of this EIR present a discussion of existing conditions; relevant plans, policies, and ordinances; thresholds of significance; impacts; significance of impacts; and feasible mitigation measures to reduce the level of impact and residual level of significance (i.e., after application of mitigation). Issues evaluated in these sections consist of the environmental topics identified below and in Section 1.3, Program Environmental Impact Report Format, of this PEIR. Chapter 5, Cumulative Impacts, identifies the cumulative impacts of the Project in combination with other past, planned, and probable future development in the region. Chapter 6, Environmental Effects Found Not to be Significant, provides a description of environmental issue areas that were found to have no impact and a rationale for why they need not be addressed further in this PEIR, as required by CEQA Guidelines Section 15128. Chapter 7, Alternatives, presents a reasonable range of alternatives and evaluates the environmental effects of those alternatives relative to the proposed Project, as required by CEQA Guidelines Section 15126.6. Chapter 8, Mandatory Discussion Areas, addresses any significant environmental effects that cannot be avoided, the significant irreversible environmental changes that would result from implementation of the Project, and growth-inducing impacts associated with the Project. Chapter 9, Mitigation Monitoring and Reporting Program, identifies the mitigation measures from Chapter 4 that would reduce environmental impacts associated with implementation of the Project. Chapter 10, References, provides full citations for the various materials, documents, and resources referenced throughout this PEIR.

The discussion in Chapter 4 is organized by nine environmental issue areas as follows:

- 4.1, Air Quality and Odor
- 4.2, Biological Resources
- 4.3, Greenhouse Gas Emissions
- 4.4, Historical, Archaeological, and Tribal Cultural Resources
- 4.5, Land Use
- 4.6, Noise
- 4.7, Paleontological Resources
- 4.8, Transportation
- 4.9, Solid Waste

The analysis and discussion for Sections 4.1 through 4.9 is organized into the following nine subsections:

Introduction – This subsection introduces the environmental issue area and the topics discussed within the section.

Existing Conditions – This subsection describes the physical environmental conditions in the vicinity of the Project at the time of publication of the Notice of Preparation (NOP). The environmental setting establishes the baseline conditions by which the City will determine whether specific Project-related impacts are significant.

Regulatory Setting – This subsection describes the regulatory setting applicable to the environmental issue area and the Project at the time of publication of the NOP.

Thresholds of Significance – This subsection identifies a set of thresholds by which the level of impact is determined. Thresholds that were eliminated from further review in the PEIR as part of the Initial Study analysis will be identified here.

Approach and Methodology – This subsection, when applicable, describes the approach and methodology used to assess impacts.

Impacts – This subsection provides a detailed analysis regarding the environmental effects of the Project and whether the impacts of the Project would meet or exceed the established significance criteria.

Significance of Impacts – This subsection discusses whether Project-related impacts would be reduced to below a level of significance with implementation of the mitigation measures identified in the PEIR. If applicable, this subsection also identifies any residual significant and unavoidable adverse effects of the Project that would result even with implementation of mitigation measures.

Mitigation, Monitoring, and Reporting – This subsection identifies potentially feasible mitigation measures that would avoid or substantially reduce significant adverse Project impacts.

Significance After Mitigation – This subsection discusses the level of significance of impact resulting from the Project after incorporation of mitigation measures, if any.

4.1 AIR QUALITY AND ODOR

4.1.1 INTRODUCTION

This section describes the existing air quality and odor setting of the City of San Diego (City) Utilities Undergrounding Program (Project); identifies the applicable regulatory framework; evaluates potential impacts associated with air quality and odor that would result from the Project; identifies mitigation measures, if necessary, to reduce the level of impact associated with implementation of the Project; and identifies the level of significance after mitigation. Information in this section is from applicable environmental plans, including the *City of San Diego General Plan*, San Diego Municipal Code (SDMC), and Community Plans.

4.1.2 EXISTING CONDITIONS

Climate and Topography

The weather of the San Diego region, as in most of Southern California, is influenced by the Pacific Ocean and its semi-permanent high-pressure systems that result in dry, warm summers and mild, occasionally wet winters. The average temperature ranges (in °F) from the mid-40s to the high 90s. Most of the region's precipitation falls from November to April, with infrequent (approximately 10%) precipitation during the summer. The average seasonal precipitation along the coast is approximately 10 inches; the amount increases with elevation as moist air is lifted over the mountains (WRCC 2017).

The topography in the San Diego region varies greatly, from beaches on the west to mountains and desert on the east; along with local meteorology, it influences the dispersal and movement of pollutants in the basin. The mountains to the east prohibit dispersal of pollutants in that direction and help trap them in inversion layers.

The interaction of ocean, land, and the Pacific High Pressure Zone maintains clear skies for much of the year and influences the direction of prevailing winds (westerly to northwesterly). Local terrain is often the dominant factor inland, and winds in inland mountainous areas tend to blow through the valleys during the day and down the hills and valleys at night.

San Diego Air Basin Climatology

The Project area is located within the San Diego Air Basin (SDAB) and is subject to the San Diego County Air Pollution Control District (SDAPCD) guidelines and regulations. The SDAB is one of 15 air basins that geographically divides the State of California. The SDAB is currently classified as a federal nonattainment area for ozone (O_3) and a state nonattainment area for particulate matter less than 10 microns (PM_{10}), particulate matter less than 2.5 microns ($PM_{2.5}$), and O_3.

The SDAB lies in the southwest corner of California and comprises the entire San Diego region, covering 4,260 square miles, and is an area of high air pollution potential. The basin experiences warm summers, mild winters, infrequent rainfalls, light winds, and moderate humidity. This usually mild climatological pattern is interrupted infrequently by periods of extremely hot weather, winter storms, or Santa Ana winds.

The climate also drives the pollutant levels. The climate of San Diego is classified as Mediterranean, but it is incredibly diverse due to the topography. The climate is dominated by the Pacific High Pressure System that results in mild, dry summers and mild, wet winters. The Pacific High drives the prevailing winds in the SDAB. The winds tend to blow onshore during the daytime and offshore at night. In the fall months, the SDAB is often impacted by Santa Ana winds. These winds are the result of a high pressure system over the Nevada–Utah region that overcomes the westerly wind pattern and forces hot, dry winds from the east to the Pacific Ocean (SDAPCD 2020a). The winds blow the SDAB's pollutants out to sea. However, a weak Santa Ana can transport air pollution from the SDAB and greatly increase the San Diego O_3 concentrations. A strong Santa Ana also primes the vegetation for firestorm conditions.

The SDAB experiences frequent temperature inversions. Subsidence inversions occur during the warmer months as descending air associated with the Pacific High Pressure Zone meets cool marine air. The boundary between the two layers of air creates a temperature inversion that traps pollutants. The other type of inversion, a radiation inversion, develops on winter nights when air near the ground cools by heat radiation and air aloft remains warm. The shallow inversion layer formed between these two air masses also can trap pollutants. As the pollutants become more concentrated in the atmosphere, photochemical reactions occur that produce O_3, which contributes to the formation of smog. Smog is a combination of smoke and other particulates, O_3, hydrocarbons, oxides of nitrogen (NO_x), and other chemically reactive compounds, which, under certain conditions of weather and sunlight, may result in a murky brown haze that causes adverse health effects (CARB 2022a).

Light daytime winds, predominately from the west, further aggravate the condition by driving air pollutants inland, toward the mountains. During the fall and winter, air quality problems are created due to carbon monoxide (CO) and NO_x emissions. CO concentrations are generally higher in the morning and late evening. In the morning, CO levels are elevated due to cold temperatures and the large number of motor vehicles traveling. Higher CO levels during the late evenings are a result of stagnant atmospheric conditions trapping CO in the area. Since CO is produced almost entirely from automobiles, the highest CO concentrations in the basin are associated with heavy traffic. Nitrogen dioxide (NO_2) levels are also generally higher during fall and winter days.

Under certain conditions, atmospheric oscillation results in the offshore transport of air from the Los Angeles region to San Diego County. This often produces high O_3 concentrations, as measured

at air pollutant monitoring stations within San Diego County. The transport of air pollutants from Los Angeles to San Diego has also occurred within the stable layer of the elevated subsidence inversion, where high levels of O_3 are transported.

Sensitive Receptors

Air quality varies as a direct function of the quantity of pollutants emitted into the atmosphere, the size and topography of the air basin, and the prevailing meteorological conditions. Air quality problems arise when the rate of pollutant emissions exceeds the rate of dispersion. Reduced visibility, eye irritation, and adverse health impacts upon those persons termed sensitive receptors are the most serious hazards of existing air quality conditions in the area.

Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. People most likely to be affected by air pollution include children, older adults, athletes, and people with cardiovascular and chronic respiratory diseases. Facilities and structures where these air pollution–sensitive people live or spend considerable amounts of time are known as sensitive receptors. Land uses where air pollution–sensitive individuals are most likely to spend time include schools and schoolyards, parks and playgrounds, daycare centers, nursing homes, hospitals, and residential communities (sensitive sites or sensitive land uses) (CARB 2005). In regards to the analysis of potential impacts to sensitive receptors, the City specifically recommends consideration of sensitive receptors in locations such as day care centers, schools, retirement homes, and hospitals, or medical patients in residential homes close to major roadways or stationary sources, which could be impacted by air pollutants. The closest sensitive receptors that may be affected by Project activities are residences located directly adjacent to overhead utility lines that will be undergrounded.

4.1.2.1 Pollutants and Effects

Criteria Air Pollutants

Criteria air pollutants are defined as pollutants for which the federal and state governments have established ambient air quality standards, or criteria, for outdoor concentrations to protect public health. The federal and state standards have been set, with an adequate margin of safety, at levels above which concentrations could be harmful to human health and welfare. These standards are designed to protect the most sensitive persons from illness or discomfort. Pollutants of concern include O_3, NO_2, CO, sulfur dioxide (SO_2), PM_{10}, $PM_{2.5}$, and lead. These pollutants are discussed in the following paragraphs. In California, sulfates, vinyl chloride, hydrogen sulfide, and visibility-reducing particles are also regulated as criteria air pollutants.

Ozone. O_3 is a strong-smelling, pale blue, reactive, toxic chemical gas consisting of three oxygen atoms. It is a secondary pollutant formed in the atmosphere by a photochemical process involving

the sun's energy and O_3 precursors. These precursors are mainly NO_x and volatile organic compounds (VOCs). The maximum effects of precursor emissions on O_3 concentrations usually occur several hours after they are emitted and many miles from the source. Meteorology and terrain play major roles in O_3 formation, and ideal conditions occur during summer and early autumn on days with low wind speeds or stagnant air, warm temperatures, and cloudless skies. The O_3 that the U.S. Environmental Protection Agency (EPA) and the California Air Resources Board (CARB) regulate as a criteria air pollutant is produced close to the ground level, where people live, exercise, and breathe. Ground-level O_3 is a harmful air pollutant that causes numerous adverse health effects and is thus considered "bad" O_3. Stratospheric, or "good," O_3 occurs naturally in the upper atmosphere, where it reduces the amount of ultraviolet light (i.e., solar radiation) entering the earth's atmosphere. Without the protection of the beneficial stratospheric O_3 layer, plant and animal life would be seriously harmed.

O_3 in the troposphere causes numerous adverse health effects; short-term exposures (lasting for a few hours) to O_3 at levels typically observed in Southern California can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes (EPA 2013). These health problems are particularly acute in sensitive receptors such as the sick, older adults, and young children.

Nitrogen Dioxide. NO_2 is a brownish, highly reactive gas that is present in all urban atmospheres. The major mechanism for the formation of NO_2 in the atmosphere is the oxidation of the primary air pollutant nitric oxide (NO), which is a colorless, odorless gas. NO_x plays a major role, together with VOCs, in the atmospheric reactions that produce O_3. NO_x is formed from fuel combustion under high temperature or pressure. In addition, NO_x is an important precursor to acid rain and may affect both terrestrial and aquatic ecosystems. The two major emissions sources are transportation and stationary fuel combustion sources such as electric utility and industrial boilers.

NO_2 can irritate the lungs, cause bronchitis and pneumonia, and lower resistance to respiratory infections (EPA 2021).

Carbon Monoxide. CO is a colorless, odorless gas formed by the incomplete combustion of hydrocarbon, or fossil fuels. CO is emitted almost exclusively from motor vehicles, power plants, refineries, industrial boilers, ships, aircraft, and trains. In urban areas, such as the Project location, automobile exhaust accounts for the majority of CO emissions. CO is a non-reactive air pollutant that dissipates relatively quickly; therefore, ambient CO concentrations generally follow the spatial and temporal distributions of vehicular traffic. CO concentrations are influenced by local meteorological conditions—primarily wind speed, topography, and atmospheric stability. CO from motor vehicle exhaust can become locally concentrated when surface-based temperature inversions are combined with calm atmospheric conditions, which is a typical situation at dusk in urban areas from November to February. The highest levels of CO typically occur during the colder months of the year, when inversion conditions are more frequent.

In terms of adverse health effects, CO competes with oxygen, often replacing it in the blood, reducing the blood's ability to transport oxygen to vital organs. The results of excess CO exposure can include dizziness, fatigue, and impairment of central nervous system functions.

Sulfur Dioxide. SO_2 is a colorless, pungent gas formed primarily from incomplete combustion of sulfur-containing fossil fuels. The main sources of SO_2 are coal and oil used in power plants and industries; as such, the highest levels of SO_2 are generally found near large industrial complexes. In recent years, SO_2 concentrations have been reduced by the increasingly stringent controls placed on stationary source emissions of SO_2 and limits on the sulfur content of fuels.

SO_2 is an irritant gas that attacks the throat and lungs and can cause acute respiratory symptoms and diminished ventilator function in children. When combined with particulate matter, SO_2 can injure lung tissue and reduce visibility and the level of sunlight. SO_2 can also yellow plant leaves and erode iron and steel.

Particulate Matter. Particulate matter pollution consists of very small liquid and solid particles floating in the air, which can include smoke, soot, dust, salts, acids, and metals. Particulate matter can form when gases emitted from industries and motor vehicles undergo chemical reactions in the atmosphere. $PM_{2.5}$ and PM_{10} represent fractions of particulate matter. Coarse particulate matter (PM_{10}) consists of particulate matter that is 10 microns or less in diameter and is about 1/7 the thickness of a human hair. Major sources of PM_{10} include crushing or grinding operations; dust stirred up by vehicles traveling on roads; wood-burning stoves and fireplaces; dust from construction, landfills, and agriculture; wildfires and brush/waste burning; industrial sources; windblown dust from open lands; and atmospheric chemical and photochemical reactions. Fine particulate matter ($PM_{2.5}$) consists of particulate matter that is 2.5 microns or less in diameter and is roughly 1/28 the diameter of a human hair. $PM_{2.5}$ results from fuel combustion (e.g., from motor vehicles and power generation and industrial facilities), residential fireplaces, and woodstoves. In

addition, $PM_{2.5}$ can be formed in the atmosphere from gases such as sulfur oxides (SO_x), NO_x, and VOCs.

$PM_{2.5}$ and PM_{10} pose a greater health risk than larger-size particles. When inhaled, these tiny particles can penetrate the human respiratory system's natural defenses and damage the respiratory tract. $PM_{2.5}$ and PM_{10} can increase the number and severity of asthma attacks, cause or aggravate bronchitis and other lung diseases, and reduce the body's ability to fight infections. Very small particles of substances such as lead, sulfates, and nitrates can cause lung damage directly or be absorbed into the blood stream, causing damage elsewhere in the body. Additionally, these substances can transport absorbed gases such as chlorides or ammonium into the lungs, also causing injury. Whereas PM_{10} tends to collect in the upper portion of the respiratory system, $PM_{2.5}$ is so tiny that it can penetrate deeper into the lungs and damage lung tissue. Suspended particulates also damage and discolor surfaces on which they settle and produce haze and reduce regional visibility.

People with influenza, people with chronic respiratory and cardiovascular diseases, and older adults may suffer worsening illness and premature death as a result of breathing particulate matter. People with bronchitis can expect aggravated symptoms from breathing in particulate matter. Children may experience a decline in lung function due to breathing in PM_{10} and $PM_{2.5}$ (EPA 2009).

Lead. Lead in the atmosphere occurs as particulate matter. Sources of lead include leaded gasoline; the manufacturing of batteries, paints, ink, ceramics, and ammunition; and secondary lead smelters. Prior to 1978, mobile emissions were the primary source of atmospheric lead. Between 1978 and 1987, the phaseout of leaded gasoline reduced the overall inventory of airborne lead by nearly 95%. With the phaseout of leaded gasoline, secondary lead smelters, battery recycling, and manufacturing facilities are becoming lead-emissions sources of greater concern.

Prolonged exposure to atmospheric lead poses a serious threat to human health. Health effects associated with exposure to lead include gastrointestinal disturbances, anemia, kidney disease, and in severe cases, neuromuscular and neurological dysfunction. Of particular concern are low-level lead exposures during infancy and childhood. Such exposures are associated with decrements in neurobehavioral performance, including IQ performance, psychomotor performance, reaction time, and growth. Children are highly susceptible to the effects of lead.

Volatile Organic Compounds. Hydrocarbons are organic gases that are formed from hydrogen and carbon and sometimes other elements. Hydrocarbons that contribute to formation of O_3 are referred to and regulated as VOCs (also referred to as reactive organic gases). Combustion engine exhaust, oil refineries, and fossil-fueled power plants are the sources of hydrocarbons. Other sources of hydrocarbons include evaporation from petroleum fuels, solvents, dry-cleaning solutions, and paint.

The primary health effects of VOCs result from the formation of O_3 and its related health effects. High levels of VOCs in the atmosphere can interfere with oxygen intake by reducing the amount of available oxygen through displacement. Carcinogenic forms of hydrocarbons, such as benzene, are considered toxic air contaminants (TACs).

Sulfates. Sulfates are the fully oxidized form of sulfur, which typically occur in combination with metals or hydrogen ions. Sulfates are produced from reactions of SO_2 in the atmosphere and can result in respiratory impairment, as well as reduced visibility.

Vinyl Chloride. Vinyl chloride is a colorless gas with a mild, sweet odor, which has been detected near landfills, sewage plants, and hazardous waste sites, due to the microbial breakdown of chlorinated solvents. Short-term exposure to high levels of vinyl chloride in air can cause nervous system effects, such as dizziness, drowsiness, and headaches. Long-term exposure through inhalation can cause liver damage, including liver cancer.

Hydrogen Sulfide. Hydrogen sulfide is a colorless and flammable gas that has a characteristic odor of rotten eggs. Sources of hydrogen sulfide include geothermal power plants, petroleum refineries, sewers, and sewage treatment plants. Exposure to hydrogen sulfide can result in nuisance odors, as well as headaches and breathing difficulties at higher concentrations.

Visibility-Reducing Particles. Visibility-reducing particles are any particles in the air that obstruct the range of visibility. Effects of reduced visibility can include obscuring the viewshed of natural scenery, reducing airport safety, and discouraging tourism. Sources of visibility-reducing particles are the same as for $PM_{2.5}$.

Non-Criteria Pollutants

Toxic Air Contaminants. A substance is considered toxic if it has the potential to cause adverse health effects in humans, including increasing the risk of cancer upon exposure, or acute and/or chronic noncancer health effects. A toxic substance released into the air is considered a TAC. Examples include certain aromatic and chlorinated hydrocarbons, formaldehyde, certain metals, and asbestos. TACs are generated by a number of sources, including stationary sources such as dry cleaners, gas stations, combustion sources, and laboratories; mobile sources such as automobiles; and area sources such as landfills. Adverse health effects associated with exposure to TACs may include carcinogenic (i.e., cancer-causing) and noncarcinogenic effects. Noncarcinogenic effects typically affect one or more target organ systems and may be experienced either on short-term (acute) or long-term (chronic) exposure to a given TAC.

Diesel Particulate Matter. Diesel particulate matter (DPM) is part of a complex mixture that makes up diesel exhaust. Diesel exhaust is composed of two phases, gas and particle, both of which contribute to health risks. More than 90% of DPM is less than 1 micrometer in diameter (about 1/70

the diameter of a human hair), and thus it is a subset of $PM_{2.5}$ (CARB 2022b). DPM is typically composed of carbon particles ("soot," also called black carbon) and numerous organic compounds, including over 40 known cancer-causing organic substances. Examples of these chemicals include polycyclic aromatic hydrocarbons, benzene, formaldehyde, acetaldehyde, acrolein, and 1,3-butadiene (CARB 2022b). CARB classified "particulate emissions from diesel-fueled engines" (i.e., DPM) as a TAC in August 1998 (17 CCR 93000). DPM is emitted from a broad range of diesel engines: on-road diesel engines of trucks, buses, and cars and off-road diesel engines including locomotives, marine vessels, and heavy-duty construction equipment, among others. Approximately 70% of all airborne cancer risk in California is associated with DPM (CARB 2000). To reduce the cancer risk associated with DPM, CARB adopted a diesel risk reduction plan in 2000 (CARB 2000). Because it is part of $PM_{2.5}$, DPM also contributes to the same noncancer health effects as $PM_{2.5}$ exposure. These effects include premature death; hospitalizations and emergency department visits for exacerbated chronic heart and lung disease, including asthma; increased respiratory symptoms; and decreased lung function in children. Several studies suggest that exposure to DPM may also facilitate development of new allergies (CARB 2022b). Those most vulnerable to noncancer health effects are children whose lungs are still developing and older adults who often have chronic health problems.

Odorous Compounds. Odors are generally regarded as an annoyance rather than a health hazard. Manifestations of a person's reaction to odors can range from psychological (e.g., irritation, anger, or anxiety) to physiological (e.g., circulatory and respiratory effects, nausea, vomiting, and headache). The ability to detect odors varies considerably among the population and overall is quite subjective. People may have different reactions to the same odor. An odor that is offensive to one person may be perfectly acceptable to another (e.g., coffee roaster). An unfamiliar odor is more easily detected and is more likely to cause complaints than a familiar one. Known as odor fatigue, a person can become desensitized to almost any odor, and recognition may only occur with an alteration in the intensity. The occurrence and severity of odor impacts depend on the nature, frequency, and intensity of the source; wind speed and direction; and the sensitivity of receptors.

Due to the subjective nature of odor impacts, the number of variables that can influence the potential for an odor impact, and the variety of odor sources, there are no quantitative or formulaic methodologies to determine if potential odors would have a significant impact. Examples of land uses and industrial operations that are commonly associated with odor complaints include agricultural uses, wastewater treatment plants, food processing facilities, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. In addition to the odor source, the distance between the sensitive receptor(s) and the odor source and the local meteorological conditions are considerations in the potential for a project to frequently expose the public to objectionable odors. Although localized air quality impacts are focused on potential impacts to sensitive receptors, such as residences and schools, other land uses where people may congregate (e.g., workplaces) or uses with the intent to attract people (e.g., restaurants and visitor-serving accommodations) should also be considered in the evaluation of potential odor nuisance impacts.

Valley Fever. Coccidioidomycosis, more commonly known as "valley fever," is an infection caused by inhalation of the spores of the *Coccidioides immitis* fungus, which grows in the soils of the southwestern United States. The fungus is very prevalent in the soils of California's San Joaquin Valley, particularly in Kern County. Kern County is considered a highly endemic county (i.e., more than 20 cases annually of valley fever per 100,000 people) based on the incidence rates reported through 2016 (CDPH 2017). The ecologic factors that appear to be most conducive to survival and replication of the spores are high summer temperatures, mild winters, sparse rainfall, and alkaline, sandy soils.

San Diego County is not considered a highly endemic region for valley fever. The latest report from the California Department of Public Health indicates that the County has 12.7 cases per 100,000 people in 2022, which is well below the state average (CDPH 2024). Additionally, in 2021, the case rate in the zip code of the Project area was reported as between 5.0 and 7.6 cases per 100,000 people (County of San Diego 2021).

Local Air Quality

San Diego Air Basin Attainment Designation

An area is designated in attainment when it is in compliance with the National Ambient Air Quality Standards (NAAQS) and/or California Ambient Air Quality Standards (CAAQS). These standards are set by the EPA or CARB for the maximum level of a given air pollutant that can exist in the outdoor air without unacceptable effects on human health or the public welfare. The criteria pollutants of primary concern that are considered in this analysis are O_3, NO_2, CO, SO_2, PM_{10}, and $PM_{2.5}$. Although there are no ambient standards for VOCs or NO_x, they are important as precursors to O_3.

The portion of the SDAB where the Project area is located is designated by the EPA as an attainment area for the 1997 8-hour NAAQS for O_3 and as a marginal nonattainment area for the 2008 8-hour NAAQS for O_3.The SDAB is designated in attainment for all other criteria pollutants under the NAAQS with the exception of PM_{10}, which was determined to be unclassifiable. The SDAB is currently designated nonattainment for O_3 and particulate matter, PM_{10} and $PM_{2.5}$, under the CAAQS. It is designated attainment for the CAAQS for CO, NO_2, SO_2, lead, and sulfates.

Table 4.1-1, San Diego Air Basin Attainment Classification, summarizes the SDAB's federal and state attainment designations for each of the criteria pollutants.

Table 4.1-1
San Diego Air Basin Attainment Classification

Pollutant	Federal Designation	State Designation
O_3 (8-hour)	**Nonattainment**	**Nonattainment**
O_3 (1-hour)	Attainment[a]	**Nonattainment**
CO	Attainment	Attainment
PM_{10}	Unclassifiable[b]	**Nonattainment**

Table 4.1-1
San Diego Air Basin Attainment Classification

Pollutant	Federal Designation	State Designation
$PM_{2.5}$	Attainment	**Nonattainment**[c]
NO_2	Attainment	Attainment
SO_2	Attainment	Attainment
Lead	Attainment	Attainment
Sulfates	(No federal standard)	Attainment
Hydrogen sulfide	(No federal standard)	Unclassified
Visibility-reducing particles	(No federal standard)	Unclassified
Vinyl chloride	(No federal standard)	No designation

Source: SDAPCD 2022a.

Notes: O_3 = ozone; CO = carbon monoxide; PM_{10} = particulate matter less than 10 microns; $PM_{2.5}$ = particulate matter less than 2.5 microns; NO_2 = nitrogen dioxide; SO_2 = sulfur dioxide.

[a] The federal 1-hour standard of 0.12 parts per million (ppm) was in effect from 1979 through June 15, 2005. The revoked standard is referenced here because it was employed for such a long period and because this benchmark is addressed in State Implementation Plans.

[b] At the time of designation, if the available data does not support a designation of attainment or nonattainment, the area is designated as unclassifiable.

[c] The California Air Resources Board (CARB) has not reclassified the region to attainment yet due to (1) incomplete data, and (2) the use of non-California Approved Samplers (CAS). While data collected does meet the requirements for designation of attainment with federal $PM_{2.5}$ standards, the data completeness requirements for state $PM_{2.5}$ standards substantially exceed federal requirements and mandates and have historically not been feasible for most air districts to adhere to given local resources. SDAPCD has begun replacing most regional filter-based $PM_{2.5}$ monitors as they reach the end of their useful life with continuous $PM_{2.5}$ air monitors to ensure collected data meets stringent completeness requirements in the future. SDAPCD anticipates these new monitors will be approved as "CAS" monitors once CARB reviews the list of approved monitors, which has not been updated since 2013.

Air Quality Monitoring Data

The SDAPCD operates a network of ambient air monitoring stations throughout San Diego County, which measure ambient concentrations of pollutants and determine whether the ambient air quality meets the CAAQS and the NAAQS. The SDAPCD monitors air quality conditions at 11 locations throughout the basin. The San Diego – Kearny Villa Road monitoring station, located at 6125 Kearny Villa Road, is the most representative monitoring station to the Project for concentrations for all pollutants, except CO, SO_2, and PM_{10}. The monitoring station at 533 First Street in El Cajon is the most representative location where CO, SO_2, and PM_{10} concentrations are monitored. Ambient concentrations of pollutants from 2020 through 2022 and the number of days exceeding the ambient air quality standards are presented in Table 4.1-2, Local Ambient Air Quality Data. The state and federal 8-hour O_3 standard and state 1-hour O_3 standards were exceeded in 2020, 2021, and 2022. Additionally, the federal 24-hour $PM_{2.5}$ standard was exceeded in 2020. Air quality within the Project region had no exceedances occur during those years with both CAAQS and NAAQS for NO_2, CO, PM_{10}, and SO_2 during this monitoring period.

Table 4.1-2
Local Ambient Air Quality Data

Monitoring Station	Unit	Averaging Time	Agency/ Method	Ambient Air Quality Standard	Measured Concentration by Year			Exceedances by Year		
					2020	*2021*	*2022*	*2020*	*2021*	*2022*
Ozone (O_3)										
Kearny Villa Road Station	ppm	Maximum 1-hour concentration	State	0.09	0.123	0.095	0.095	2	1	1
	ppm	Maximum 8-hour concentration	State	0.070	0.102	0.072	0.083	12	2	2
			Federal	0.070	0.102	0.071	0.083	10	1	2
Nitrogen Dioxide (NO_2)										
Kearny Villa Road Station	ppm	Maximum 1-hour concentration	State	0.18	0.052	0.060	0.051	0	0	0
			Federal	0.100	0.052	0.060	0.051	0	0	0
	ppm	Annual concentration	State	0.030	0.007	0.007	0.008	0	0	0
			Federal	0.053	0.007	0.007	0.008	0	0	0
Carbon Monoxide (CO)										
El Cajon – First Street Station	ppm	Maximum 1-hour concentration	State	20	1.5	1.2	1.4	0	0	0
			Federal	35	1.5	1.2	1.4	0	0	0
	ppm	Maximum 8-hour concentration	State	9.0	1.4	1.1	1.1	0	0	0
			Federal	9	1.4	1.1	1.1	0	0	0
Sulfur Dioxide (SO_2)										
El Cajon – First Street Station	ppm	Maximum 1-hour concentration	Federal	0.075	0.0017	0.0016	0.0008	0	0	0
	ppm	Maximum 24-hour concentration	Federal	0.14	0.0004	0.0003	0.0003	0	0	0
	ppm	Annual concentration	Federal	0.030	0.00009	0.00006	0.00006	0	0	0

Table 4.1-2
Local Ambient Air Quality Data

Monitoring Station	Unit	Averaging Time	Agency/ Method	Ambient Air Quality Standard	Measured Concentration by Year			Exceedances by Year		
					2020	*2021*	*2022*	*2020*	*2021*	*2022*
Coarse Particulate Matter (PM_{10})										
El Cajon – First Street Station	$\mu g/m^3$	Maximum 24-hour concentration	State	50	55.0	40.0	44.0	ND	ND	ND
			Federal	150	55.0	40.0	44.0	0	0	0
Fine Particulate Matter ($PM_{2.5}$)[a]										
Kearny Villa Road Station	$\mu g/m^3$	Maximum 24-hour concentration	Federal	35	47.5	20.9	13.9	5.8 (2)	0.0 (0)	0.0 (0)
	$\mu g/m^3$	Annual concentration	State	12	ND	ND	ND	ND	ND	ND
			Federal	12.0	8.7	7.6	6.8	0.0 (0)	0.0 (0)	0.0 (0)

Sources: CARB 2024; EPA 2024.

Notes: ppm = parts per million; $\mu g/m^3$ = micrograms per cubic meter; ND = insufficient data available to determine the value.

Data taken from the California Air Resources Board's iADAM (http://www.arb.ca.gov/adam) and Environmental Protection Agency's AirData (http://www.epa.gov/airdata/) represent the highest concentrations experienced over a given year.

Exceedances of federal and state standards are only shown for O_3 and particulate matter. Daily exceedances for particulate matter are estimated days because PM_{10} and $PM_{2.5}$ are not monitored daily. All other criteria pollutants did not exceed federal or state standards during the years shown. There is no federal standard for 1-hourO_3, annual PM_{10}, or 24-hour SO_2, nor is there a state 24-hour standard for $PM_{2.5}$.

El Cajon First Street Monitoring Station is located at 533 First Street El Cajon, California 92019.

Kearny Villa Road Monitoring Station is located at 6125 Kearny Villa Road San Diego, California 92123.

[a] Measurements of PM_{10} and $PM_{2.5}$ are usually collected every 6 days and every 1 to 3 days, respectively. The number of days exceeding the standards is a mathematical estimate of the number of days concentrations would have been greater than the level of the standard had each day been monitored. The numbers in parentheses are the measured number of samples that exceeded the standard.

4.1.3 REGULATORY SETTING

Federal

Clean Air Act

The federal Clean Air Act (CAA), passed in 1970 and last amended in 1990, forms the basis for the national air pollution control effort. The EPA is responsible for implementing most aspects of the CAA, including the setting of NAAQS for major air pollutants, hazardous air pollutant (HAP) standards, approval of state attainment plans, motor vehicle emission standards, stationary source emission standards and permits, acid rain control measures, stratospheric O_3 protection, and enforcement provisions.

NAAQS are established by the EPA for "criteria pollutants" under the CAA, which are O_3, CO, NO_2, SO_2, particulate matter (PM_{10} and $PM_{2.5}$), and lead.

The NAAQS describe acceptable air quality conditions designed to protect the health and welfare of the citizens of the nation. The CAA requires the EPA to reassess the NAAQS at least every 5 years to determine whether adopted standards are adequate to protect public health based on current scientific evidence. States with areas that exceed the NAAQS must prepare a State Implementation Plan (SIP) that demonstrates how those areas will attain the standards within mandated time frames.

Federal General Conformity Rule

Federal projects are subject to either the Transportation Conformity Rule (40 CFR, Part 51, Subpart T), which applies to federal highway and transit projects, or the General Conformity Rule (40 CFR, Part 51, Subpart W), which applies to all other federal projects. The General Conformity Rule implements Section 176(c) of the federal CAA, which requires that a federal agency ensure conformity with an approved SIP for air emissions generated by an agency action. Conformity determinations for federal actions are required for each pollutant where the total of direct and indirect emissions in a nonattainment or maintenance area caused by a federal action equals or exceeds 100 tons per year for affected pollutants. Because the Project area is located within the SDAB, which is in nonattainment for O_3 and a maintenance area for CO, conformity determination requirements do apply. If a project's emissions would exceed the de minimis thresholds for CO, NO_x, or VOCs, the project would have a significant impact related to O_3.

Hazardous Air Pollutants

The 1977 federal CAA Amendments required the EPA to identify National Emission Standards for Hazardous Air Pollutants to protect public health and welfare. HAPs include certain VOCs, pesticides, herbicides, and radionuclides that present a tangible hazard, based on scientific studies of exposure

to humans and other mammals. Under the 1990 federal CAA Amendments, which expanded the control program for HAPs, 187 substances and chemical families were identified as HAPs.

State

California Clean Air Act

The California CAA was adopted in 1988 and establishes the state's air quality goals, planning mechanisms, regulatory strategies, and standards of progress. Under the California CAA, the task of air quality management and regulation has been legislatively granted to CARB, with subsidiary responsibilities assigned to air quality management districts and air pollution control districts at the regional and county levels. CARB is responsible for ensuring implementation of the California CAA, responding to the federal CAA, and regulating emissions from motor vehicles and consumer products. Pursuant to the authority granted to it, CARB has established the CAAQS, which are generally more restrictive than the NAAQS.

The NAAQS and CAAQS are presented in Table 4.1-3, Ambient Air Quality Standards.

Table 4.1-3
Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards[a]	National Standards[b]	
		Concentration[c]	*Primary*[c,d]	*Secondary*[c,e]
O_3	1 hour	0.09 ppm (180 μg/m^3)	N/A	Same as Primary Standard[f]
	8 hours	0.070 ppm (137 μg/m^3)	0.070 ppm (137 μg/m^3)[f]	
NO_2[g]	1 hour	0.18 ppm (339 μg/m^3)	0.100 ppm (188 μg/m^3)	Same as Primary Standard
	Annual arithmetic mean	0.030 ppm (57 μg/m^3)	0.053 ppm (100 μg/m^3)	
CO	1 hour	20 ppm (23 mg/m^3)	35 ppm (40 mg/m^3)	None
	8 hours	9.0 ppm (10 mg/m^3)	9 ppm (10 mg/m^3)	
SO_2[h]	1 hour	0.25 ppm (655 μg/m^3)	0.075 ppm (196 μg/m^3)	N/A
	3 hours	N/A	N/A	0.5 ppm (1,300 μg/m^3)
	24 hours	0.04 ppm (105 μg/m^3)	0.14 ppm (for certain areas)[g]	N/A
	Annual	N/A	0.030 ppm (for certain areas)[g]	N/A

Table 4.1-3
Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards[a]	National Standards[b]	
		Concentration[c]	*Primary*[c,d]	*Secondary*[c,e]
PM_{10}[i]	24 hours	50 μg/m^3	150 μg/m^3	Same as Primary Standard
	Annual arithmetic mean	20 μg/m^3	N/A	
$PM_{2.5}$[i]	24 hours	N/A	35 μg/m^3	Same as Primary Standard
	Annual arithmetic mean	12 μg/m^3	12.0 μg/m^3	15.0 μg/m^3
Lead[j,k]	30-day average	1.5 μg/m^3	N/A	N/A
	Calendar quarter	N/A	1.5 μg/m^3 (for certain areas)[k]	Same as Primary Standard
	Rolling 3-month average	N/A	0.15 μg/m^3	
Hydrogen sulfide	1 hour	0.03 ppm (42 μg/m^3)	N/A	N/A
Vinyl chloride[j]	24 hours	0.01 ppm (26 μg/m^3)	N/A	N/A
Sulfates	24 hours	25 μg/m^3	N/A	N/A
Visibility-reducing particles	8 hour (10:00 a.m. to 6:00 p.m. PST)	Insufficient amount to produce an extinction coefficient of 0.23 per kilometer due to the number of particles when the relative humidity is less than 70%	N/A	N/A

Source: CARB 2016.

Notes: O_3 = ozone; ppm = parts per million by volume; μg/m^3 = micrograms per cubic meter; N/A = not applicable; NO_2 = nitrogen dioxide; CO = carbon monoxide; mg/m^3= milligrams per cubic meter; SO_2 = sulfur dioxide; PM_{10} = particulate matter with an aerodynamic diameter less than or equal to 10 microns; $PM_{2.5}$ = particulate matter with an aerodynamic diameter less than or equal to 2.5 microns.

[a] California standards for O_3, CO, SO_2 (1-hour and 24-hour), NO_2, suspended particulate matter (PM_{10}, $PM_{2.5}$), and visibility-reducing particles are values that are not to be exceeded. All others are not to be equaled or exceeded. The California Ambient Air Quality Standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

[b] National standards (other than O_3, NO_2, SO_2, particulate matter, and those based on annual averages or annual arithmetic mean) are not to be exceeded more than once per year. The O_3 standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over 3 years, is equal to or less than the standard. For PM_{10}, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 μg/m^3 is equal to or less than 1. For $PM_{2.5}$, the 24-hour standard is attained when 98% of the daily concentrations, averaged over 3 years, are equal to or less than the standard.

[c] Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based on a reference temperature of 25° Celsius (°C) and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.

[d] National Primary Standards: The levels of air quality necessary, with an adequate margin of safety, to protect the public health.

[e] National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

[f] On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.

[g] To attain the national 1-hour standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 parts per billion (ppb). Note that the national 1-hour standard is in units of ppb. California standards are in units of ppm. To directly compare the national 1-hour standard to the California standards, the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.

[h] On June 2, 2010, a new 1-hour SO_2 standard was established, and the existing 24-hour and annual primary standards were revoked. To attain the national 1-hour standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO_2 national standards (24-hour and annual) remain in effect until 1 year after an area is designated for the 2010 standard, except that in areas designated nonattainment of the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.

[i] On December 14, 2012, the national annual $PM_{2.5}$ primary standard was lowered from 15 $\mu g/m^3$ to 12.0 $\mu g/m^3$. The existing national 24-hour $PM_{2.5}$ standards (primary and secondary) were retained at 35 $\mu g/m^3$, as was the annual secondary standard of 15 $\mu g/m^3$. The existing 24-hour PM_{10} standards (primary and secondary) of 150 $\mu g/m^3$ were also retained. The form of the annual primary and secondary standards is the annual mean averaged over 3 years.

[j] CARB has identified lead and vinyl chloride as toxic air contaminants with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

[k] The national standard for lead was revised on October 15, 2008, to a rolling 3-month average. The 1978 lead standard (1.5 $\mu g/m^3$ as a quarterly average) remains in effect until 1 year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.

Toxic Air Contaminants

The state Air Toxics Program was established in 1983 under Assembly Bill (AB) 1807 (Tanner). The California TAC list identifies more than 700 pollutants, of which carcinogenic and noncarcinogenic toxicity criteria have been established for a subset of these pollutants pursuant to the California Health and Safety Code. In accordance with AB 2728, the state list includes the (federal) HAPs. The Air Toxics "Hot Spots" Information and Assessment Act of 1987 (AB 2588) seeks to identify and evaluate risk from air toxics sources; however, AB 2588 does not regulate air toxics emissions. TAC emissions from individual facilities are quantified and prioritized. "High-priority" facilities are required to perform a health risk assessment and, if specific thresholds are exceeded, are required to communicate the results to the public in the form of notices and public meetings.

In 2000, CARB approved a comprehensive diesel risk reduction plan to reduce diesel emissions from both new and existing diesel-fueled vehicles and engines. The regulation was anticipated to result in an 80% decrease in statewide diesel health risk in 2020 compared with the diesel risk in 2000. Additional regulations apply to new trucks and diesel fuel, including the On-Road Heavy Duty Diesel Vehicle (In-Use) Regulation, the On-Road Heavy Duty (New) Vehicle Program, the In-Use Off-Road Diesel Vehicle Regulation, and the New Off-Road Compression-Ignition (Diesel) Engines and Equipment program. All of these regulations and programs have timetables by which manufacturers must comply and existing operators must upgrade their diesel powered equipment. Several Airborne Toxic Control Measures reduce diesel emissions, including In-Use Off-Road Diesel-Fueled Fleets (13 CCR 2449 et seq.) and In-Use On-Road Diesel-Fueled Vehicles (13 CCR 2025).

California Health and Safety Code Section 41700

Section 41700 of the Health and Safety Code states that a person shall not discharge from any source whatsoever quantities of air contaminants or other material that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or that endanger the comfort, repose, health, or safety of any of those persons or the public, or that cause, or have a natural tendency to cause, injury or damage to business or property. This section also applies to sources of objectionable odors.

Local

San Diego County Air Pollution Control District

While CARB is responsible for the regulation of mobile emission sources within the state, local air quality management districts and air pollution control districts are responsible for enforcing standards and regulating stationary sources. The Project area is located within the SDAB and is subject to the guidelines and regulations of the SDAPCD.

In San Diego County, O_3 and particulate matter are the pollutants of main concern, since exceedances of CAAQS for those pollutants are experienced here in most years. For this reason, the SDAB has been designated as a nonattainment area for the state PM_{10}, $PM_{2.5}$, and O_3 standards. The SDAB is also a federal O_3 attainment (maintenance) area for 1997 8-hour O_3 standard, an O_3 nonattainment area for the 2008 8-hour O_3 standard, and a CO maintenance area (western and central part of the SDAB only). The Project area is in the CO maintenance area.

In November 2020, the SDAPCD adopted the air quality management plan for attaining the federal 8-hour 75 parts per billion (ppb) and 70 ppb O_3 standards (2020 Attainment Plan), which is the air basin's input to the SIP and required to demonstrate how the SDACPD proposes to attain the federal O_3 standards. The plan anticipates attainment of the 75 ppb and 70 ppb NAAQS standards by 2026 and 2032, respectively. The 2020 Attainment Plan includes planning requirements for attaining the

O_3 NAAQS including on-road motor vehicle emissions budgets for transportation conformity, a VMT offset demonstration, Reasonably Available Control Measures, Reasonable Further Progress, an Attainment Demonstration, and contingency measures in the event of a failure to meet a milestone or to attain by the predicted attainment date (SDAPCD 2020b).

The SDAPCD and San Diego Association of Governments (SANDAG) are responsible for developing and implementing the clean air plan for attainment and maintenance of the ambient air quality standards in the SDAB. The Regional Air Quality Strategy (RAQS) for the SDAB was initially adopted in 1991 and is updated every 3 years, most recently in 2022 (SDAPCD 2022b). The RAQS plan demonstrates how the San Diego region will further reduce air pollution emissions to meet state health-based standards for ground-level O_3. The 2022 RAQS guides the SDAPCD in deploying tools, strategies, and resources to continue reducing pollutants that are precursors to ground-level O_3, including NO_x and VOC. The 2022 RAQS emphasizes O_3 control measures but also identifies complementary measures and strategies that can reduce emissions of greenhouse gases (GHGs) and particulate matter. It also includes new analyses exploring O_3 and its relationship to public health, mobile sources, under-resourced communities, and GHGs and climate change. Further, the 2022 RAQS identifies strategies to expand SDAPCD regional partnerships, identify more opportunities to engage the public and communities of concern, and integrate environmental justice and equity across all proposed measures and strategies. The CARB mobile source emission projections and SANDAG growth projections are based on population, vehicle trends, and land use plans developed by the County of San Diego (County) and the cities in the County as part of the development of their general plans (SANDAG 2017a, 2017b).

In regard to particulate matter emissions reduction efforts, in December 2005, SDAPCD prepared a report titled *Measures to Reduce Particulate Matter in San Diego County* to address implementation of Senate Bill (SB) 656 in San Diego County (SB 656 required additional controls to reduce ambient concentrations of PM_{10} and $PM_{2.5}$) (SDAPCD 2005). In the report, SDAPCD evaluated the implementation of source-control measures that would reduce particulate matter emissions associated with residential wood combustion; various construction activities, including earthmoving, demolition, and grading; bulk material storage and handling; carryout and trackout removal and cleanup methods; inactive disturbed land; disturbed open areas; unpaved parking lots/staging areas; unpaved roads; and windblown dust (SDAPCD 2005).

As stated earlier, the SDAPCD is responsible for planning, implementing, and enforcing federal and state ambient standards in the SDAB. The following rules and regulations apply to all sources in the jurisdiction of SDAPCD:

- **SDAPCD Regulation IV: Prohibitions; Rule 50: Visible Emissions.** Prohibits any activity causing air contaminant emissions darker than 20% opacity for more than an aggregate of 3 minutes in any consecutive 60-minute time period. In addition, Rule 50 prohibits any diesel

pile-driving hammer activity causing air contaminant emissions for a period or periods aggregating more than 4 minutes during the driving of a single pile (SDAPCD 1997).

- **SDAPCD Regulation IV: Prohibitions; Rule 51: Nuisance.** Prohibits the discharge, from any source, of such quantities of air contaminants or other materials that cause or have a tendency to cause injury, detriment, nuisance, or annoyance to people and/or the public, or damage to any business or property (SDAPCD 1976).
- **SDAPCD Regulation IV: Prohibitions; Rule 55: Fugitive Dust.** Regulates fugitive dust emissions from any commercial construction or demolition activity capable of generating fugitive dust emissions, including active operations, open storage piles, and inactive disturbed areas, as well as track-out and carry-out onto paved roads beyond a project site (SDAPCD 2009).
- **SDAPCD Regulation IV: Prohibitions; Rule 67.0.1: Architectural Coatings.** Requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce VOC emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories (SDAPCD 2015).

City of San Diego

The SDMC addresses air quality and odor impacts in Chapter 14, Article 2, Division 7, Section 142.0710, "Air Contaminant Regulations," which states: "Air contaminants including smoke, charred paper, dust, soot, grime, carbon, noxious acids, toxic fumes, gases, odors, and particulate matter, or any emissions that endanger human health, cause damage to vegetation or property, or cause soiling shall not be permitted to emanate beyond the boundaries of the premises upon which the use emitting the contaminants is located."

4.1.4 THRESHOLDS OF SIGNIFICANCE

The City's *California Environmental Quality Act (CEQA) Significance Determination Thresholds* (City of San Diego 2022) are based on CEQA Guidelines Appendix G and incorporate SDAPCD regulations. For purposes of this analysis, the Project would have a significant environmental impact if it would:

Issue 1 Conflict with or obstruct implementation of the applicable air quality plan

Issue 2 Violate any air quality standard or contribute substantially to an existing or projected air quality violation

Issue 3 Exceed 100 pounds per day of Particulate Matter (PM) (dust)

Issue 4 Expose sensitive receptors to substantial pollutant concentrations

Issue 5 Create objectionable odors affecting a substantial number of people

Issue 6 Substantially alter air movement in the area of the Project

4.1.5 APPROACH AND METHODOLOGY

The California Emissions Estimator Model (CalEEMod) 2022 Version 2022.1 was used to estimate emissions from construction of the Project (CAPCOA 2022). CalEEMod is a statewide computer model developed in cooperation with air districts throughout the state to quantify criteria air pollutant and GHG emissions associated with construction activities and operation of a variety of land use projects, including road construction and other linear projects. CalEEMod input parameters, including the land use type used to represent the Project and its size, construction schedule, and anticipated use of construction equipment, were based on information provided by the City or default model assumptions if project specifics were unavailable. Given that operations would be similar to existing conditions, and in some cases may actually be reduced as a result of the Project, operational criteria air pollutant emissions were not estimated and are discussed qualitatively.

Construction

Due to the programmatic scope of this analysis, specific Project locations and construction activities are not available. However, this analysis assumes a "maximum intensity" construction scenario to conservatively estimate air emissions at a Project-level. As mentioned above, construction emissions were estimated using CalEEMod, available online.

Information regarding a typical construction scenario, including anticipated phasing and phase duration, off-road equipment, worker trips, vendor truck trips (including water trucks and concrete trucks), and haul truck trips, was provided by City staff and described in Chapter 3, Project Description. The Project has a goal of undergrounding approximately 15 miles of overhead utility lines each year. Based on the trenching, boring, and conduit installation phase lasting approximately 24 months, it was assumed that approximately 100 feet of trenching and tunneling would be completed per day, and a maximum of four 3.75-mile projects could occur simultaneously throughout the City.

Construction of projects implemented under the Project would result in a temporary addition of pollutants to the local airshed caused by soil disturbance, fugitive dust emissions, and combustion pollutants from on-site construction equipment, as well as from off-site trucks hauling construction materials. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation, and, for dust, the prevailing weather conditions. Fugitive dust (PM_{10} and $PM_{2.5}$) emissions would primarily result from pavement saw-cutting, removal, and soil trenching activities. NO_x and CO emissions would primarily result from the use of construction equipment and motor vehicles.

The following typical construction-related activities would be implemented under the Project and are described here in order to support a conservative Project-level air quality analysis based on the maximum intensity Project scenario.

Trenching/Boring and Conduit Installation

Trenching or tunneling activities would involve open trenching techniques to create trenches approximately 2.5 feet wide and 5 feet deep to install duct banks that can accommodate round plastic conduit below the surface of the roadway. Trenching or tunneling activities would typically last approximately 24 months.

Cabling and Connection

After installation of the duct banks and hand holes, cables would be installed in the conduit. Each cable would be pulled through the conduit using a cable reel at one end and a pulling rig at the other end. The cabling phase would typically last approximately 16 months.

Cut-Overs

Once a new underground system is in place and energized and all properties have been prepared to receive underground service, all properties would be switched over from the overhead lines to the new underground systems. This phase would take approximately 2 months to complete.

Removal of Overhead Equipment and Poles

When all properties within a district have been switched over to the new underground system, the overhead systems would be de-energized and removed. Crews would dismantle the hardware on existing poles using cranes and aerial man-lifts. Old poles would be cut off at ground level and removed from the site using a truck-mounted crane and a line truck. The base of the pole would be removed, and the hole would then be backfilled. The surface would be restored to grade. The removal of overhead utilities would last up to 12 months.

Post-Undergrounding Improvements and Street Restoration

Once the new underground utility lines are in place, the City would construct public improvements, including the installation of curb ramps and new streetlights, tree planting, and restoration of damaged streets.

Table 4.1-4 provides the construction timeline and phasing assumptions to complete the construction of underground utility systems and the subsequent removal of overhead utility systems. Construction phasing and assumptions are intended to represent a schedule of anticipated activities for use in estimating the potential maximum intensity Project scenario.

Table 4.1-4
Utilities Undergrounding Program Construction Phasing Assumptions

Project Phase	Duration
Phase I: Trenching/Boring/Conduit	24 months
Phase II: Cabling and Connection	16 months
Phase III: Cut-Overs	2 months
Phase IV: Removal of Overhead Equipment and Poles	12 months
Phase V: Post-Undergrounding Improvements	7 months
Phase VI: Street Restoration	2 months

Source: Construction phasing and schedule provided in Chapter 3, Project Description.

The equipment mix summarized in Table 4.1-5 is meant to represent a reasonably conservative estimate of construction-related activities for any given project. For the purpose of this program-level analysis, it is assumed that most heavy construction equipment would be operating 5 days per week, with specific hours per day provided by the City per piece of equipment.

Table 4.1-5
Construction Scenario Assumptions

Construction Phase	Daily One-Way Vehicle Trips			Equipment		
	Worker Trips	*Vendor Truck Trips*	*Haul Truck Trips*	*Equipment Type*	*Quantity*	*Usage Hours*
Phase I: Trenching/ Boring/Conduit	40	12	6	Air Compressors	2	4
				Directional Drill (Ditch Witch)	1	6
				Concrete/ Industrial Saws	1	1
				Mini Excavator (305E2)	1	6
				Small Skid Steer (289D)	1	6
				Excavator (305CR)	1	6
				Loader/Backhoe	1	4
				Mini Roller	1	3
				Plate Compactor	1	3
Phase II: Cabling and Connection	24	8	0	Generator Sets	3	8
Phase III: Cut-Overs	16	0	0	Aerial Lift	3	8
	10	0	6	Air Compressors	2	6

Table 4.1-5
Construction Scenario Assumptions

Construction Phase	Daily One-Way Vehicle Trips			Equipment		
	Worker Trips	*Vendor Truck Trips*	*Haul Truck Trips*	*Equipment Type*	*Quantity*	*Usage Hours*
Phase IV: Removal of Overhead Equipment and Poles				Aerial Lift (Bucket Truck)	2	8
				Truck-Mounted Crane	2	5
Phase V: Post-Undergrounding Improvements	28	2	0	Bobcat w/Auger	1	8
				Concrete/ Industrial Saws	1	2
				Jackhammer	2	8
				Air Compressor	1	8
				Small Crane	1	2
				Concrete/ Industrial Saw	2	8
				Jackhammer	1	8
				Air Compressor	2	8
Phase VI: Street Restoration	16	4	4	Bobcat w/Grinder	1	5
				Front End Loader	1	5
				Slurry Seal Paver	1	5
				Street Sweeper	1	4
				Roller	1	5
				Road Marking Paint Applicator	1	4
				Backhoe	1	3
				Front End Loader	1	3
				Street Sweeper	1	2
				Road Marking Paint Applicator	1	2

Source: Construction equipment mix provided in Chapter 3, Project Description.

4.1.6 IMPACTS

Issue 1: Would the Project conflict with or obstruct the implementation of the applicable air quality plan?

Impact Threshold

According to the City's *CEQA Significance Determination Thresholds* (City of San Diego 2022), air quality impacts would be significant if the project would conflict with or obstruct implementation of the applicable air quality plan.

The SDAPCD is required, pursuant to the federal CAA, to reduce emissions of criteria pollutants for which the SDAB is in nonattainment. Strategies to achieve these emissions reductions are developed in the RAQS and SIP, prepared by the air pollution control district for the region.

The CARB mobile source emission projections and SANDAG growth projections that are used to develop the RAQS and SIP are based on population and vehicle trends and land use plans developed by the cities and by the County. As such, projects that propose development that is consistent with or propose less density than the growth anticipated by local community or general plans would be consistent with the RAQS. If a project proposes development that is greater than that anticipated in the local plan and SANDAG's growth projections upon which the RAQS is based, the project would be in conflict with the RAQS and SIP and may have a potentially significant impact on air quality. This situation would warrant further analysis to determine if the project and the surrounding projects exceed the growth projections used in the RAQS for the specific subregional area.

Analysis

As stated in Section 4.1.2, the SDAPCD and SANDAG are responsible for developing and implementing the clean air plans for attainment and maintenance of the ambient air quality standards in the SDAB, specifically, the SIP and RAQS.[1] The federal O_3 maintenance plan, which is part of the SIP, was adopted in 2020. The SIP includes a demonstration that current strategies and tactics will maintain acceptable air quality in the SDAB based on the NAAQS. The RAQS was initially adopted in 1991 and is updated on a triennial basis (most recently in 2022). The RAQS outlines SDAPCD's plans and control measures designed to attain the state air quality standards for O_3. The SIP and RAQS rely on information from CARB and SANDAG, including mobile and area source emissions, as well as information regarding projected growth in San Diego County and the cities within the County, to project future emissions and then determine from that the strategies necessary for the reduction of emissions through regulatory controls. CARB mobile source emission projections and SANDAG growth projections are based on population, vehicle trends, and land use plans developed by the County and the cities in the County as part of the development of their general plans.

The Project does not include a component that would increase local population growth. Rather, the Project would convert existing overhead utility lines to underground. The proposed replacement of

[1] For the purpose of this discussion, the relevant federal air quality plan is the O_3 maintenance plan (SDAPCD 2020b). The RAQS is the applicable plan for purposes of state air quality planning. Both plans reflect growth projections in the SDAB.

existing poles would not expand capacity or extend service compared to existing conditions; therefore, the Project would not contribute to growth of housing, population, or future emissions or other growth estimates that were used to develop the RAQS.

Implementation of the Project would result in operational activities less intense than present activities, and criteria air pollutant emissions would not increase as a result of converting the existing overhead distribution lines to an underground franchise position. As a result, the Project would not conflict with implementation of the RAQS or SIP. Impacts would be **less than significant**.

Issue 2: Would the Project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Issue 3: Would the Project exceed 100 pounds per day of Particulate Matter (PM) (dust)?

Impact Threshold

According to the City's *CEQA Significance Determination Thresholds* (City of San Diego 2022), air quality impacts would be significant if the project would:

- Violate any air quality standard or contribute substantially to an existing or projected air quality violation
- Result in 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 (including release emissions which exceed quantitative thresholds for ozone precursors)

Per the City's *CEQA Significance Determination Thresholds*, the SDAPCD Air Quality Significance Thresholds shown in Table 4.1-6 were used to determine the significance of Project-generated construction and operational criteria air pollutants, specifically, the Project's potential to violate any air quality standard or contribute substantially to an existing or projected air quality violation.

The air quality section of the *CEQA Significance Determination Thresholds* recognizes attainment status designations for the SDAB and its nonattainment status for both O_3 and particulate matter. As such, the document recognizes that all new projects should include measures, pursuant to CEQA, to reduce project-related emissions of O_3 precursors and particulate matter to ensure new development does not contribute to San Diego's nonattainment status for these pollutants.

As part of its air quality permitting process, SDAPCD has established thresholds in Rule 20.2 requiring the preparation of air quality impact assessments for permitted stationary sources (SDAPCD 2020b). The SDAPCD sets forth quantitative emissions thresholds below which a stationary source would not have a significant impact on ambient air quality. Project-related air quality impacts

estimated in this environmental analysis would be considered significant if any of the applicable significance thresholds presented in Table 4.1-6 are exceeded.

Table 4.1-6
Criteria Pollutant Significance Thresholds

Pollutant	Emission Rate		
	lbs/hr	*lbs/day*	*tons/yr*
Carbon monoxide (CO)	100	550	100
Oxides of nitrogen (NO_x)	25	250	40
Particulate matter, 10 microns (PM_{10})	N/A	100	15
Oxides of sulfur (SO_x)[a]	25	250	40
Particulate matter, 2.5 microns ($PM_{2.5}$)	N/A	67[b]	10
Volatile organic compounds (VOCs) reactive organic gases (ROGs)	N/A	137[c]	15

Source: City of San Diego 2022.
Notes: lbs/hour = pounds per hour; lbs/day = pounds per day; tons/year = tons per year; N/A = not applicable.
[a] The San Diego Air Basin has been in attainment of the SO_x standard due to sulfur-free natural gas for electricity generation and lack of heavy industrial/manufacturing uses in the region.
[b] $PM_{2.5}$ thresholds are consistent with the San Diego County Air Pollution District (SDAPCD) air quality impact analysis trigger levels (Regulation II, Rule 20.2, Table 20.2-1; SDAPCD 2020c).
[c] The VOC threshold is based on South Coast Air Quality Management District (SCAQMD) levels per SCAQMD SDAPCD (9/01) and the Monterey Bay Air Pollution Control District, which has a similar federal and state attainment status as San Diego (City of San Diego 2022).

Analysis

Construction Impacts

Table 4.1-7 shows the estimated maximum daily unmitigated construction emissions associated with the maximum intensity Project scenario. Complete details of the emissions calculations are provided in Appendix B.

Table 4.1-7
Estimated Maximum Daily Construction Emissions for the Utilities Undergrounding Program – Unmitigated

Year	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	Pounds per Day					
Maximum Intensity Project Scenario						
2027	1.24	10.81	14.83	0.03	1.16	0.45
2028	3.91	33.99	46.92	0.08	2.48	1.29
2029	3.14	27.35	37.34	0.07	1.75	0.98
Maximum (one 3.75-mile project)	*3.91*	*33.99*	*46.92*	*0.08*	*2.48*	*1.29*
Maximum (four 3.75-mile projects)	*15.62*	*135.96*	*187.67*	*0.33*	*9.91*	*5.18*

Table 4.1-7
Estimated Maximum Daily Construction Emissions for the Utilities Undergrounding Program – Unmitigated

Year	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	Pounds per Day					
Maximum Intensity Project Scenario						
SDAPCD Threshold	*137*	*250*	*550*	*250*	*100*	*67*
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Source: See Appendix B for complete results.
Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; SDAPCD = San Diego County Air Pollution Control District; CalEEMod = California Emissions Estimator Model.
The values shown are the maximum summer or winter daily emissions results from CalEEMod.

As shown in Table 4.1-7, daily construction emissions for the maximum intensity 3.75-mile project scenario and the maximum annual four 3.75-mile-project scenario would not exceed the City's significance thresholds for any criteria air pollutant. Thus, construction impacts would be **less than significant**.

Operational Impacts

Implementation of the Project would result in operational activities less intense than present activities, and criteria air pollutant emissions would not increase as a result of converting the existing overhead distribution lines to an underground franchise position. Thus, operational impacts would be **less than significant**.

Cumulative Impacts

The SDAB has been designated as a federal nonattainment area for O_3 and a state nonattainment area for O_3, PM_{10}, and $PM_{2.5}$. The poor air quality in the SDAB is the result of cumulative emissions from motor vehicles, off-road equipment, commercial and industrial facilities, and other emission sources. Projects that emit these pollutants or their precursors (i.e., VOCs and NO_x for O_3) potentially contribute to poor air quality. In analyzing cumulative impacts from a project, the analysis must specifically evaluate the project's contribution to the cumulative increase in pollutants for which the SDAB is designated as nonattainment for the CAAQS and NAAQS. If the project does not exceed thresholds and is determined to have less-than-significant project-specific impacts, it may still contribute to a significant cumulative impact on air quality if the emissions from the project, in combination with the emissions from other proposed or reasonably foreseeable future projects, are in excess of established thresholds. However, a project would only be considered to have a significant cumulative impact if the project's contribution accounts for a significant proportion of the cumulative total emissions (i.e., it represents a "cumulatively considerable contribution" to the cumulative air quality impact).

Regarding short-term construction impacts, the SDAPCD thresholds of significance are used to determine whether the Project may have a short-term cumulative impact. As shown in Table 4.1-7, the Project would not exceed any criteria air pollutant during construction.

Additionally, for the SDAB, the RAQS serves as the long-term regional air quality planning document for the purpose of assessing cumulative operational emissions in the basin to ensure the SDAB continues to make progress toward NAAQS- and CAAQS-attainment status. As such, cumulative projects located in the San Diego region would have the potential to result in a cumulative impact to air quality if, in combination, they would conflict with or obstruct implementation of the RAQS. Similarly, individual projects that are inconsistent with the regional planning documents upon which the RAQS is based would have the potential to result in cumulative operational impacts if they represent development and population increases beyond regional projections.

Regarding long-term cumulative operational emissions in relation to consistency with local air quality plans, the SIP and RAQS serve as the primary air quality planning documents for the state and SDAB, respectively. The SIP and RAQS rely on SANDAG growth projections based on population, vehicle trends, and land use plans developed by the cities and the County as part of the development of their general plans. Therefore, projects that propose development that is consistent with the growth anticipated by local plans would be consistent with the SIP and RAQS and would not be considered to result in cumulatively considerable impacts from operational emissions. As stated previously, the Project would not result in significant regional growth that is not accounted for within the RAQS. Thus, impacts would be **less than significant**.

Health Effects of Criteria Air Pollutants

While the general health effects from exposure to criteria air pollutants are known, there is no methodology for determining more precisely the adverse health impacts from project construction activities conducted under the Project. Criteria air pollutant thresholds are set by the EPA and the CARB under the CAA to be protective of human health, and local and regional agencies rely on these thresholds and apply them at the local and regional level. Local and regional agencies have not conducted a detailed breakdown of the results of the EPA or CARB decision-making process or performed their own assessments of potential health impacts from criteria air pollutant emissions to establish localized thresholds of significance based on potential health impacts from a utility undergrounding project.

While the studies relied on by the EPA and CARB to set ambient air quality standards link poor air quality to adverse health effects, there is no way to accurately determine the precise adverse health impacts associated with a specific number of additional molecules of a given criteria air pollutant. This is because adverse health impacts are related to a number of factors, including genetics and environmental factors, other than air pollution. Studies related to asthma provide an example of the difficulty related to determining the precise health impacts related to a specific project's increase in

a particular criteria air pollutant. According to the National Institute of Environmental Health Sciences (NIEHS), outdoor pollution strongly impacts cases of asthma. The NIEHS-funded research studied air pollution in 10 Southern California cities and found that children living within 150 meters of a freeway were more likely to be diagnosed with asthma than children who lived farther away. The researchers also found that children living in homes near higher levels of NO_2 were more likely to develop asthma symptoms. While NO_2 is one of many pollutants emitted from motor vehicles, asthma also can be triggered by indoor allergens (i.e., dust mites, cockroaches, dogs, cats, rodents, molds, and fungi) and genetic predisposition. The link between asthma and poor air quality is well researched; however, the precise impact of poor air quality in any specific case of asthma is unclear (IEHS 2017).

In a recent Supreme Court case, two air districts filed briefs attesting to the difficulty of correlating a project's criteria air pollutant emissions to specific health impacts. The South Coast Air Quality Management District (SCAQMD), which "has among the most sophisticated air quality modeling and health impact evaluation capability of any of the air districts in the State," noted that it may be "difficult to quantify health impacts" for criteria pollutants (SCAQMD 2014). SCAQMD used O_3, which is formed from the chemical reaction of NO_x and VOCs in the presence of sunlight, as an example of why it is impracticable to determine specific health outcomes from criteria pollutants for all but very large, regional-scale projects. First, forming O_3 "takes time and the influence of meteorological conditions for these reactions to occur, so ozone may be formed at a distance downwind from the sources" (SCAQMD 2014). Second, "it takes a large amount of additional precursor emissions (NO_x and VOCs) to cause a modeled increase in ambient ozone levels over an entire region," with a 2012 study showing that "reducing NO_x by 432 tons per day (157,680 tons per year) and reducing VOC by 187 tons per day (68,255 tons per year) would reduce ozone levels at the SCAQMD's monitor site with the highest levels by only 9 parts per billion" (SCAQMD 2014). SCAQMD thus concludes that it "does not currently know of a way to accurately quantify ozone-related health impacts caused by NO_x or VOC emissions from relatively small projects" (SCAQMD 2014).

The San Joaquin Valley Air Pollution Control District (SJVAPCD) also concluded that, while it is possible to perform a health impact analysis for TACs, which was done for the Project and discussed below, "it is not feasible to conduct a similar analysis for criteria air pollutants because currently available computer modeling tools are not equipped for this task" (SJVAPCD 2014). Like the SCAQMD, the SJVAPCD cites the O_3 and particulate matter formation process as the difficulty in correlating the emission of criteria pollutants to health impacts, stating that "[b]ecause of the complexity of ozone formation, a specific tonnage amount of NO_x or VOCs emitted in a particular area does not equate to a particular concentration of ozone in that area" (SJVAPCD 2014). Similarly, the tonnage of particulate matter emitted "does not always equate to the local PM concentration because it can be transported long distances by wind," and "[s]econdary PM, like ozone, is formed via complex chemical reactions in the atmosphere between precursor chemicals such as SO_x and NO_x," meaning that "the tonnage of PM-forming precursor emissions in an area does not necessarily

result in an equivalent concentration of secondary PM in that area" (SJVAPCD 2014). The discrepancy between the amount of precursor pollutants and the concentration of O_3 or particulate matter formed makes it difficult to determine potential health impacts, which are related to the concentration of O_3 and particulate matter experienced by the receptor rather than levels of NO_x, SO_x, and VOCs produced by a source (SJVAPCD 2014). According to the SJVAPCD, "even once a model is developed to accurately ascertain local increases in concentrations of photochemical pollutants like ozone and some particulates, it remains impossible, using today's models, to correlate that increase in concentration to a specific health impact [because] such models are designed to determine regional, population-wide health impacts, and simply are not accurate when applied at the local level" (SJVAPCD 2014).

Because it is impracticable to accurately isolate the exact cause of a human disease, as for asthma, discussed above, the City has determined that existing scientific tools cannot accurately estimate health impacts of a particular project's air emissions without undue speculation.

Because estimated emissions resulting from implementation of the Project would not exceed the SDAPCD screening-level thresholds for any criteria air pollutant during construction (see Table 4.1-6), impacts related to health effects would be **less than significant**.

Issue 4: Would the Project expose sensitive receptors to substantial pollutant concentrations?

Impact Threshold

According to the City's *CEQA Significance Determination Thresholds* (City of San Diego 2022), air quality impacts would be significant if the project would:

- Expose sensitive receptors to substantial pollutant concentrations including air toxics such as diesel particulates.
- Release substantial quantities of air contaminants beyond the boundaries of the premises upon which the stationary source emitting the contaminants is located.[2]

The City's *CEQA Significance Determination Thresholds* (City of San Diego 2022) indicate that a sensitive receptor is "a person in the population who is particularly susceptible to health effects due to exposure to an air contaminant than is the population at large." The City recommends considering "sensitive receptors in locations such as day care centers, schools, retirement homes, and hospitals or medical patients in residential homes close to major roadways or stationary sources, which could

[2] SDMC See SDMC Section 142.0710 for a list of relevant contaminants.

be impacted by air pollutants" (City of San Diego 2022). Sensitive receptors (and the facilities that house them) in proximity to localized CO sources, TACs, or odors are of particular concern.

For localized CO impacts, the City's *CEQA Significance Determination Thresholds* (City of San Diego 2022) recommends that a quantitative analysis of CO hotspots be performed if a proposed development causes a six-lane or four-lane roadway to deteriorate to level of service (LOS) E or worse, causes a six-lane roadway to drop to LOS F, or if a proposed development is within 400 feet of a sensitive receptor and the LOS is D or worse. Projects contributing to adverse traffic impacts may result in the formation of a CO hotspot. Additional analysis of CO hotspot impacts would be conducted if a project would result in a significant impact or contribute to an adverse traffic impact at a signalized intersection that would potentially subject sensitive receptors to CO hotspots.

According to the SDAPCD's *Supplemental Guidelines for Submission of Air Toxics "Hot Spots" Program Health Risk Assessments* (SDAPCD 2022b), a project is deemed to have a significant risk if the health risk assessment shows that the off-site cancer risk exceeds 10 in 1 million or the noncancer chronic health hazard index exceeds 1.

Analysis

Carbon Monoxide Hotspots

Traffic-congested roadways and intersections have the potential to generate localized high levels of CO. Localized areas where ambient concentrations exceed federal and/or state standards for CO are termed CO "hotspots." CO transport is extremely limited and disperses rapidly with distance from the source. Typically, high CO concentrations are associated with severely congested intersections operating at an unacceptable LOS (LOS E or worse). The potential for CO hotspots was evaluated based on the results of the traffic report. The City's *Significance Determination Thresholds* (City of San Diego 2022) CO hotspot screening guidance was followed to determine if the Project would require a site-specific hotspot analysis.

Undergrounding project activities conducted under the Project would be temporary and would not be a source of daily, long-term mobile-source emissions. Accordingly, proposed activities would not generate traffic that would contribute to potential adverse traffic impacts that may result in the formation of CO hotspots. In addition, due to continued improvement in vehicular emissions at a rate faster than the rate of vehicle growth and/or congestion, the potential for CO hotspots in the SDAB is steadily decreasing. Maximum background CO levels in the County, as shown in Table 4.1-2, are less than 15% of the 1-hour and 8-hour NAAQS and CAAQS and would be expected to improve further due to reductions in motor vehicle emissions. Based on these considerations, impacts to air quality with regard to potential CO hotspots from project activities conducted under the Project would be **less than significant**.

Toxic Air Contaminants

In addition to impacts from criteria pollutants, Project impacts may include emissions of pollutants identified by the state and federal government as TACs or HAPs. State law has established the framework for California's TAC identification and control project, which is generally more stringent than the federal project, and is aimed at TACs that are a problem in California. The state has formally identified more than 200 substances as TACs, including the federal HAPs, and is adopting appropriate control measures for sources of these TACs.

The greatest potential for TAC emissions during construction would be diesel particulate emissions from heavy equipment operations and heavy-duty trucks, and the associated health impacts to sensitive receptors. The closest sensitive receptors are residences located directly adjacent to areas where the Project activities would be implemented.

Health effects from carcinogenic air toxics are usually described in terms of cancer risk. The SDAPCD recommends an incremental cancer risk threshold of 10 in 1 million. "Incremental cancer risk" is the likelihood that a person continuously exposed to concentrations of TACs resulting from a project over a 70-year lifetime will contract cancer based on the use of standard risk-assessment methodology. Construction activities conducted under the Project would not require the extensive ongoing use of heavy-duty construction equipment, which is subject to a CARB airborne toxic control measure for in-use diesel construction equipment to reduce diesel particulate emissions. Furthermore, construction would not involve extensive ongoing use of diesel trucks, which are also subject to an airborne toxic control measure. Construction activities for each project conducted under the Project would occur in multiple phases and would typically be completed over a 24-month period. Furthermore, the construction emissions would be temporary and dispersed along the proposed 3.75-mile alignment. Following completion of construction activities, Project-related TAC emissions would cease.

CARB has published the *Air Quality and Land Use Handbook: A Community Health Perspective* (CARB 2005), which identifies certain types of facilities or sources that may emit substantial quantities of TACs and, therefore, could conflict with sensitive land uses, such as schools and schoolyards, parks and playgrounds, daycare centers, nursing homes, hospitals, and residential communities. The Project would neither include sensitive land uses, generate substantial short-term TAC concentrations, nor include long-term TAC sources on site that would impact potential sensitive land use receptors. Accordingly, the project activities conducted under the Project would not generate substantial TAC emissions that would conflict with surrounding sensitive receptors, and impacts would be **less than significant**.

Valley Fever Exposure

Valley fever is not highly endemic to the County, and within the County, the incidence rate in the Project area is below the statewide average. Construction of the Project areas would comply with SDAPCD Rule 55, limiting fugitive dust generated during construction and subsequently reducing disturbance of potential *Coccidioides immitis* fungal spores.[3] To comply with SDAPCD Rule 55, Project construction would include watering the site two times per day. Based on the low incidence rate of Coccidioidomycosis in the Project area and in greater San Diego County, as well as the Project's implementation of dust control strategies, it is not anticipated that earth-moving activities during proposed construction activities would result in exposure of nearby sensitive receptors to valley fever. Therefore, impacts from valley fever exposure to sensitive receptors would be **less than significant**.

Issue 5: Would the Project create objectionable odors affecting a substantial number of people?

Impact Threshold

According to the City's *CEQA Significance Determination Thresholds* (City of San Diego 2022), air quality impacts would be significant if the Project would create objectionable odors affecting a substantial number of people.

Per the City's guidance, determining the significance of potential odor impacts should be based on what is known about the quantity of the odor compound(s) that would result from the Project's proposed use(s), the types of neighboring uses potentially affected, the distance(s) between the Project's point source(s) and the neighboring uses such as sensitive receptors, and the resultant concentration(s) at receptors.

For a project proposing placement of sensitive receptors near an existing odor source, a significant odor impact will be identified if the project area is closer to the odor source than any existing sensitive receptor where there has been more than one confirmed or three confirmed complaints per year (averaged over a 3-week period) about the odor source. For projects proposing placement of sensitive receptors near a source of odors where there are currently no nearby existing receptors, the determination of significance should be based on the distance and frequency at which odor complaints from the public have occurred in the vicinity of a similar odor source at another location.

Analysis

Construction conducted under the Project would result in the emission of diesel fumes and other odors at the site of construction activities, and the level of emissions would vary by specific location.

[3] The inhalation of the spores of the *Coccidioides immitis* fungus can result in a contraction of the fungal infection Coccidioidomycosis.

Furthermore, construction activities would be localized and temporary. Sensitive receptors located in the vicinity of the construction site may be affected; however, odors are highest near the source and would quickly dissipate. Although odor impacts are unlikely, activities associated with implementation of the Project would be required to comply with the SDAPCD odor policies, including Rule 51 (Public Nuisance).

Any odors associated with construction activities associated with the Project would be temporary and would cease upon completion; therefore, odor impacts would be **less than significant.**

Issue 6: Would the Project substantially alter air movement in the area of the Project?

Impact Threshold

According to the City's *CEQA Significance Determination Thresholds* (City of San Diego 2022), air quality impacts would be significant if the project would result in substantial alteration of air movement in the area of the project.

Analysis

A project that places high structures in proximity to one another can result in tunneling of air movement in an area that was previously unobstructed. The Project does not include a component that would involve placement of tall structures in proximity to one another. Rather, the Project would convert existing overhead utility lines to underground. The proposed replacement of existing poles would not result in a substantial alteration of air movement compared to existing conditions; therefore, impacts would be **less than significant**.

4.1.7 SIGNIFICANCE OF IMPACTS

Impacts would be **less than significant** for Issues 1, 2, 3, 4, 5, and 6.

4.1.8 MITIGATION, MONITORING, AND REPORTING

No mitigation is required.

4.1.9 SIGNIFICANCE AFTER MITIGATION

Because impacts related to air quality and odor would be less than significant, mitigation is not required, and impacts would remain **less than significant**.

4.2 BIOLOGICAL RESOURCES

4.2.1 INTRODUCTION

This section describes the existing biological resources setting of the City of San Diego (City) Utilities Undergrounding Program (Project), identifies the applicable regulatory framework, evaluates potential impacts associated with biological resources that would result from the Project, identifies mitigation measures, if necessary, to reduce the level of impact associated with implementation of the Project, and identifies the level of significance after mitigation. Information in this section is from applicable environmental plans, including the *City of San Diego General Plan*, San Diego Municipal Code (SDMC), and Community Plans.

The Project study area consists of over 800 districts identified in the Utilities Undergrounding Program Master Plan, as well as the 500-foot buffer area surrounding each of the utilities in each district, totaling 68,024.77 acres. In this section, each future district that is planned under the Project is referred to as an "undergrounding project." Also identified in this section are the associated regulatory requirements, an evaluation of the existing conditions, and definitions of biological Categories and Subcategories that each pole and trench location (herein referred to as a "utility") has been assigned based on the existing conditions. This section also identifies a mitigation framework for impacts that could potentially occur through implementation of the Project, and it identifies the level of significance after mitigation measures have been implemented.

Information in this section is primarily based on the review of aerial imagery of the Project study area, data available from current biological literature and publicly available geographic information system (GIS) databases, and Dudek staff's institutional knowledge of the biological characteristics of the City. The information and data used to develop this section is included as Appendix C-1, Biological Resources Mapbook, to this Program Environmental Impact Report (PEIR).

4.2.2 EXISTING CONDITIONS

4.2.2.1 Regional Overview

The City contains a variety of vegetation communities throughout its boundaries that result from the influences of the regional climate, topography, and soil composition in the area. These diverse biological environments also provide unique habitats for the large number of native plant and wildlife species that occur here and are a major part of what makes the City and County of San Diego (County) as a whole, a hot spot for biodiversity and species endangerments.

4.2.2.2 Sensitive Resources

Sensitive biological resources are generally defined as follows: (1) species that have been given special recognition by federal, state, or local agencies and organizations due to limited, declining, or threatened population sizes; (2) habitat types recognized by local and regional agencies as sensitive; (3) habitat areas or plant communities that are unique, are of relatively limited distribution, or are of particular value to wildlife; and (4) wildlife corridors and habitat linkages. Sources used for determination of general flora and fauna species, including sensitive biological resources, are as follows:

- **Plants–**U.S. Fish and Wildlife Service (USFWS) (USFWS 2024), California Department of Fish and Wildlife (CDFW) (CDFW 2024a, 2024b), California Native Plant Society (CNPS 2024), and *City of San Diego MSCP Subarea Plan* (City of San Diego 1997)
- **Wildlife–**USFWS (2024a), CDFW (2024b, 2024c), and (City of San Diego 1997)
- **Plant communities–***City of San Diego MSCP Subarea Plan (*City of San Diego 1997) and SDMC, Land Development Code (LDC)—Biology Guidelines (SDBG) (City of San Diego 2018)

4.2.2.3 Existing Conditions

The Project area is located on the Del Mar, Escondido, Imperial Beach, La Jolla, La Mesa, Otay Mesa, Point Loma, Poway, and National City, California, U.S. Geological Survey 7.5-minute topographic quadrangles. The regional landform features are typical of the coastal plain area. The coastal plain slopes gently upwards to the eastern foothills and has eroded into separate mesas. The coastal plain has been incised by numerous side canyons flowing into major creeks and rivers that generally flow westward towards the coast. In general, development in the City is concentrated on flat mesas and valleys interspersed with natural and urbanized canyon areas. The major drainage systems identified within the City include San Dieguito River, Los Peñasquitos Canyon Creek, Rose Creek, San Diego River, Alvarado Creek, Chollas Creek, Nestor Creek, Otay River, and Tijuana River.

Physical Characteristics

A general physical description of each of the Multiple Species Conservation Program (MSCP) Subarea Plan planning areas that contain the undergrounding projects in the Project are included below.

Northern Area

The City's MSCP Subarea Plan Northern Planning Area is located south of State Route (SR) 78, west of Poway, and north of Miramar, and the western edge borders the Pacific Ocean (City of San Diego 1997). The Northern Planning Area is approximately 57,143 acres and encompasses one of the few intact natural open space areas in coastal San Diego County that is linked to larger expanses of habitat to the east, including Los Peñasquitos Canyon regional corridor linking coastal habitats to

inland habitats on Blank Mountain and in Poway. Additionally, the Northern Planning Area encompasses developed and undeveloped land stretching from the Black Mountain Ranch area of the North City Future Urbanizing Area (NCFUA) south to Lopez Canyon in Los Peñasquitos Canyon Preserve in Mira Mesa, and from the coast to Interstate (I) 15. The majority of the undeveloped private land is disturbed habitat, much of it having been farmed or grazed for decades or longer.

The City's Multi-Habitat Planning Area (MHPA) is composed of regional linkages leading to biological core areas within existing reserves and parks, including Black Mountain Park to the north and San Dieguito River Valley to the north and west, and approximately 17,909 acres of the Northern Planning Area are within the MHPA. Core biological resources areas with high to moderate habitat values in the southwestern portion of the Northern Planning Area include Torrey Pines State Park, Crest Canyon, Los Peñasquitos Lagoon, and Los Peñasquitos Canyon Preserve (Appendix C-1).

There are 40 undergrounding projects within the MSCP Subarea Plan Northern Planning Area.

Urban Area

The City's MSCP Subarea Plan Urban Planning Area is located south of SR-56, west of La Mesa, and north of National City, and the western edge borders the Pacific Ocean (City of San Diego 1997). The Urban Planning Area is approximately 96,392 total acres and is primarily concentrated in existing urbanized locations. These urban areas consist of canyons with native habitats in relative proximity to other MHPA areas providing habitat, and approximately 7,592 acres of the Urban Planning Area intersect the MHPA boundary. The areas within the MHPA include existing designated open space, such as Mission Bay, Tecolote Canyon, and Marian Bear Memorial Park, which provide habitat for native species or provide shelter and forage for migrating species.

There are 718 undergrounding projects within the MSCP Subarea Plan Urban Planning Area.

Eastern Area

The City's MSCP Subarea Plan Eastern Planning Area is located south of Scripps Ranch, east of Tierrasanta, west of El Cajon, and north of I-8 (City of San Diego 1997). The Eastern Planning Area is approximately 8,708 acres and includes the remaining undeveloped lands in the eastern portion of the City. The Eastern Planning Area includes East Elliott and Mission Trail Regional Park, and approximately 7,634 acres intersect the MHPA boundary. Approximately 80% of the Mission Trails/East Elliott/Santee core area is preserved within this planning area (excluding Miramar). The biological core area provides habitat for biological resources and wildlife movement through the area and further north to Miramar.

There are five undergrounding projects within the MSCP Subarea Plan Eastern Planning Area.

Southern Area

The City's MSCP Subarea Plan Southern Planning Area is located south of Chula Vista, east of Imperial Beach, and north of the United States–Mexico International border (City of San Diego 1997). The Southern Planning Area is approximately 20,178 acres, 6,905 acres of which intersect the MHPA, and it includes a portion of the Otay Lakes/River Valley core area. Otay Mesa areas within the MHPA consist of a network of open, undisturbed canyons. Additionally, Otay River Valley within the Southern Planning Area consists of moderately narrow and well-defined floodplains bounded on both sides by urban development. The Otay River Valley supports habitat for biological resources and provides an important linkage from the Otay Mountain and Lakes area to the San Diego Bay.

There are 48 undergrounding projects within the MSCP Subarea Plan Southern Planning Area.

Cornerstone Lands

The City's MSCP Subarea Plan Cornerstone Lands Planning Areas consist of four large areas of land, including land around Hodges Reservoir (including a portion of San Pasqual Valley), lands surrounding portions of Upper and Lower Otay Lakes, lands surrounding the San Vicente Reservoir, and lands owned by the City in Marron Valley. Collectively, the Cornerstone Lands total 10,400 acres and are referred to as the Cornerstone Lands due to their vital role for creating a viable habitat preserve system. The Cornerstone Lands are entirely within the MHPA. The Cornerstone Lands include valuable grassland, wetland, riparian, shrub, and other habitat types, including natural areas around Hodges Reservoir and the riparian habitat along the San Dieguito River.

There are 10 undergrounding projects within the MSCP Subarea Cornerstone Lands Planning Area, all of which are located in the Hodges Cornerstone Lands.

Multi-Habitat Planning Area

The City MHPA is a hard-line preserve developed by the City in cooperation with the wildlife agencies, property owners, developers, and environmental groups. The MHPA identifies biological core resource areas and corridors targeted for conservation, in which only limited development may occur (City of San Diego 1997). The MHPA is considered an urban preserve that is constrained by existing or approved development and consists of habitat linkages connecting several large core areas of habitat. The criteria used to define core and linkage areas involves maintaining ecosystem function and processes, including large animal movement. Each core area is connected to other core areas or to habitat areas outside of the MSCP either through common boundaries or through linkages. Core areas have multiple connections to help ensure that the balance in the ecosystem will be maintained (City of San Diego 1997). Critical habitat linkages between core areas are conserved in a functional manner with a minimum of 75% of the habitat within identified linkages conserved (City of San Diego 1997). Urban habitat areas within the MHPA include existing designated open space

such as Mission Bay, Tecolote Canyon, Marian Bear Memorial Park, Rose Canyon, San Diego River, the southern slopes along Mission Valley, Carroll and Rattlesnake Canyons, Florida Canyon, Chollas Creek, and a variety of smaller canyon systems. The southern area includes Otay Mesa, Otay River Valley, Tijuana Estuary, and Tijuana River Valley. The eastern area includes East Elliott and Mission Trails Regional Park.

From the undergrounding projects within the MSCP Subarea Plan planning areas described above, 244 undergrounding projects have at least some overlap with the MHPA boundary. However, the exact number of undergrounding projects adjacent to or within the MHPA boundary is subject to change as districts come forward for project-specific analysis due to changes in the MHPA boundary over time.

Biological Resources

The Project study area encompasses a total of 68,024.77 acres, and a total of 54 vegetation communities and/or land cover types have been identified as mapped either within the Project's individual project alignments (i.e., urban/developed land mapped along existing roadways) or within a 500-foot buffer surrounding project alignment locations within the limits of the City (study area) (City of San Diego 1997) based on the San Diego Geographic Information Source (SanGIS) vegetation data layer. All vegetation communities, including sensitive communities (Tier I–IIIB and Wetlands), occurring in the study area are identified in Table 4.2-1 and shown in Appendix C-1, as well as described below.

A formal jurisdictional delineation was not conducted within the Project study area, and therefore, unless otherwise demonstrated through project-level technical analyses to be conducted at the time of construction, all hydrophytic-vegetation communities and streambed channels identified in databases reviewed for the Project are considered either wetlands or non-wetland waters under the jurisdiction of the U.S. Army Corps of Engineers (USACE), San Diego Regional Water Quality Control Board (RWQCB), CDFW, and, if in the coastal zone (COZ), California Coastal Commission (CCC).

Based on publicly available mapping data, a total of 1,817.87 acres of wetlands and non-wetland waters were determined to be present in the Project's study area (Table 4.2-2; Appendix C-1; City of San Diego 1997).

Table 4.2-1
Upland Vegetation Communities and Land Cover Types in the Project Study Area

Oberbauer et al. (2008) Vegetation Community, (Holland Code)	SDBG Vegetation Community	MSCP Subarea Plan Planning Area (Acres)					Total Acres
		Northern Area	*Urban Area*	*Eastern Area*	*Southern Area*	*Cornerstone Lands*	
Tier I[1]							
Coast Live Oak Woodland (71160)	Oak Woodlands	1.02	0.00	0.00	0.00	1.96	**2.98**
Dense Coast Live Oak Woodland (71162)	Oak Woodlands	0.00	29.71	0.00	0.00	34.23	**63.94**
Maritime Succulent Scrub (32400)	Maritime Succulent Scrub	97.27	64.79	0.00	10.86	0.00	**172.93**
Oak Woodland (71100)	Oak Woodlands	0.00	0.00	0.00	0.00	0.14	**0.14**
Scrub Oak Chaparral (37900)	Scrub Oak Chaparral	0.00	0.50	0.00	0.00	0.00	**0.50**
Southern Coastal Bluff Scrub (31200)	Coastal Bluff Scrub	8.20	0.08	0.00	0.00	0.00	**8.28**
Southern Maritime Chaparral (37C30)	Maritime Chaparral	47.38	19.60	0.00	0.00	0.00	**66.98**
Valley and Foothill Grassland (42000)	Native Grassland	309.78	615.29	160.09	273.43	187.32	**1,545.91**
Valley Needlegrass Grassland (42110)	Native Grassland	18.15	2.18	0.00	0.00	0.78	**21.11**

Table 4.2-1
Upland Vegetation Communities and Land Cover Types in the Project Study Area

Oberbauer et al. (2008) Vegetation Community, (Holland Code)	SDBG Vegetation Community	MSCP Subarea Plan Planning Area (Acres)					Total Acres
		Northern Area	*Urban Area*	*Eastern Area*	*Southern Area*	*Cornerstone Lands*	
	Tier I Subtotal[2]	*481.80*	*732.15*	*160.09*	*284.29*	*224.43*	***1,882.76***
				Tier II[1]			
Coastal Scrub (32000)	Coastal Sage Scrub	0.00	0.00	0.00	0.00	0.03	**0.03**
Coastal Sage-Chaparral Scrub (37G00)	Coastal Sage Scrub/ Chaparral	8.11	0.00	0.00	0.00	0.00	**8.11**
Diegan Coastal Sage Scrub (32500)	Coastal Sage Scrub	570.67	3,125.92	90.10	452.67	556.85	**4,796.21**
	Tier II Subtotal[2]	*578.78*	*3,125.92*	*90.10*	*452.67*	*556.88*	***4,804.35***
				Tier IIIA[1]			
Chamise Chaparral (37200)	Chamise Chaparral	19.20	12.65	0.00	7.94	0.00	**39.79**
Chaparral (37000)	Chamise Chaparral	359.93	520.16	0.56	0.00	40.03	**920.67**
Southern Mixed Chaparral (37120)	Mixed Chaparral	126.99	3.88	0.00	34.69	0.83	**166.39**
	Tier IIIA Subtotal[2]	*506.12*	*536.68*	*0.56*	*42.63*	*40.86*	***1,126.85***
				Tier IIIB[1]			
Non-Native Grassland (42200)	Non-Native Grassland	373.15	7.64	0.00	1.30	44.49	**426.57**
	Tier IIIB Subtotal[2]	*373.15*	*7.64*	*0.00*	*1.30*	*44.49*	***426.57***
				Tier IV[1]			
Disturbed Habitat (11300)	Disturbed Land	267.79	1,608.69	42.46	1,193.39	228.22	**3,340.55**

Table 4.2-1
Upland Vegetation Communities and Land Cover Types in the Project Study Area

Oberbauer et al. (2008) Vegetation Community, (Holland Code)	SDBG Vegetation Community	MSCP Subarea Plan Planning Area (Acres)					Total Acres
		Northern Area	*Urban Area*	*Eastern Area*	*Southern Area*	*Cornerstone Lands*	
Eucalyptus Woodland (11100)	Eucalyptus Woodland	63.49	76.63	0.00	1.25	7.55	**148.93**
Extensive Agriculture – Field/Pasture, Row Crops (18300)	Agriculture	141.56	5.77	0.00	1,410.76	798.74	**2,356.83**
Field/Pasture (18310)	Agriculture	0.00	0.00	0.00	0.00	4.10	**4.10**
Intensive Agriculture – Dairies, Nurseries, Chicken Ranches (18200)	Agriculture	87.07	27.14	0.00	377.44	253.73	**745.37**
Non-Native Vegetation (11000)	Ornamental Plantings	0.00	0.00	0.00	14.55	0.00	**14.55**
Orchards and Vineyards (18100)	Agriculture	0.00	0.00	0.00	0.00	349.64	**349.64**
Row Crops (18320)	Agriculture	0.00	0.00	0.00	0.00	525.88	**525.88**
Urban/ Developed (12000)	Disturbed Land	1,524.07	45,329.20	13.61	3,321.58	292.15	**50,480.61**
Tier IV Subtotal[2]		*2,083.98*	*47,047.44*	*56.07*	*6,318.96*	*2,460.01*	***57,966.46***
Upland Total[2]		**4,023.83**	**51,449.83**	**306.81**	**7,099.85**	**3,326.67**	**66,206.99**

Notes: SDBG = City of San Diego Municipal Code, Land Development Code—Biology Guidelines; MSCP = Multiple Species Conservation Program.

[1] City Subarea Plan "Tiers" and wetland identification are from the SDBG (City of San Diego 2018).

[2] Totals may not sum due to rounding.

Table 4.2-2
Wetland and Non-Wetland Waters in the Project Study Area

Oberbauer et al. (2008) Vegetation Community	SDBG Vegetation Community	MSCP Subarea Plan Planning Area (Acres)					Total Acres
		Northern Area	*Urban Area*	*Eastern Area*	*Southern Area*	*Cornerstone Lands*	
Wetlands							
Arundo donax Dominant/ Southern Willow Scrub (63321)	Disturbed Wetland (Invasive Dominated)	0.00	0.00	0.00	2.36	0.00	**2.36**
Cismontane Alkali Marsh (52310)	Freshwater Marsh	0.00	1.80	0.00	0.00	29.43	**31.24**
Coastal and Valley Freshwater Marsh (52410)	Freshwater Marsh	22.14	13.43	0.00	0.00	18.07	**53.64**
Disturbed Wetland (11200)	Disturbed Wetland	6.20	12.39	0.00	4.01	36.18	**58.78**
Freshwater Marsh (52400)	Freshwater Marsh	0.21	0.00	0.00	6.19	0.00	**6.40**
Mule Fat Scrub (63310)	Riparian Scrub	1.00	0.00	0.00	5.85	0.50	**7.35**
Riparian and Bottomland Habitat (60000)	Riparian Scrub	0.00	11.18	0.00	0.00	0.00	**11.18**
Riparian Woodlands (62000)	Riparian Forest or Woodland	0.00	0.00	0.55	0.00	0.00	**0.55**
Saltpan/Mudflats (13300)	Salt Panne	1.78	0.00	0.00	0.00	0.00	**1.78**
Southern Coast Live Oak Riparian Forest (61310)	Riparian Forest or Woodland	7.63	69.44	0.00	0.00	11.57	**88.64**
Southern Coastal Salt Marsh (52120)	Coastal Salt Marsh	84.75	42.86	0.00	2.04	0.00	**129.65**
Southern Cottonwood-Willow Riparian Forest (61330)	Riparian Forest or Woodland	0.00	51.56	0.00	0.00	10.79	**62.34**
Southern Riparian Forest (61300)	Riparian Forest or Woodland	6.97	26.12	13.27	0.00	43.77	**90.13**

Table 4.2-2
Wetland and Non-Wetland Waters in the Project Study Area

Oberbauer et al. (2008) Vegetation Community	SDBG Vegetation Community	MSCP Subarea Plan Planning Area (Acres)					Total Acres
		Northern Area	*Urban Area*	*Eastern Area*	*Southern Area*	*Cornerstone Lands*	
Southern Riparian Scrub (63300)	Riparian Scrub	31.16	215.12	20.12	228.19	117.25	**611.83**
Southern Sycamore-Alder Riparian Woodland (62400)	Riparian Forest or Woodland	60.06	81.84	4.90	0.03	0.00	**146.83**
Southern Willow Scrub (63320)	Riparian Scrub	0.36	0.00	0.00	41.74	59.40	**101.51**
Tamarisk Scrub (63810)	Disturbed Wetland (Invasive Dominated)	0.45	0.00	0.00	0.65	8.07	**9.17**
	Wetlands Subtotal	*222.69*	*525.74*	*38.84*	*291.06*	*335.03*	***1,413.36***
Non-Wetland Waters							
Beach (13400)	Marine Habitats	0.00	59.13	0.00	0.00	0.00	**59.13**
Deep Bay (13121)	Marine Habitats	0.00	5.52	0.00	0.00	0.00	**5.52**
Estuarine (13130)	Marine Habitats	0.00	19.56	0.00	0.00	0.00	**19.56**
Freshwater (13140)	Natural Flood Channel	6.81	67.02	3.08	5.90	16.66	**99.47**
Freshwater Seep (45400)	Freshwater Marsh	1.44	0.32	0.00	0.00	0.00	**1.76**
Intermediate Bay (13122)	Marine Habitats	0.00	11.29	0.00	0.00	0.00	**11.29**
Intertidal (13112)	Marine Habitats	0.00	30.73	0.00	0.00	0.00	**30.73**
Non-Vegetated Channel, Floodway, Lakeshore Fringe (13200)	Natural Flood Channel	0.44	3.36	2.98	0.40	93.45	**100.63**
Open Water (13100)	Natural Flood Channel	0.00	0.00	0.00	3.41	0.00	**3.41**
Shallow Bay (13123)	Marine Habitats	0.00	72.44	0.00	0.00	0.00	**72.44**

Table 4.2-2
Wetland and Non-Wetland Waters in the Project Study Area

Oberbauer et al. (2008) Vegetation Community	SDBG Vegetation Community	MSCP Subarea Plan Planning Area (Acres)					Total Acres
		Northern Area	*Urban Area*	*Eastern Area*	*Southern Area*	*Cornerstone Lands*	
Subtidal (13111)	Marine Habitats	0.00	0.58	0.00	0.00	0.00	**0.59**
Non-Wetland Waters Subtotal		*8.69*	*269.94*	*6.06*	*9.71*	*110.11*	***404.51***
Wetland Total[1]		**231.38**	**795.68**	**44.90**	**300.77**	**445.14**	**1,817.87**

Notes: SDBG = City of San Diego Municipal Code, Land Development Code—Biology Guidelines; MSCP = Multiple Species Conservation Program.

1 Totals may not sum due to rounding.

2 City Wetland and Non-Wetland Waters habitat within the Project is assumed to be under the jurisdiction of the U.S. Army Corps of Engineers, Regional Water Quality Control Board, California Department of Fish and Wildlife, and California Coastal Commission (when it occurs in the Costal Overlay Zone).

Upland Vegetation Communities and Land Cover Types

Tier I Habitats – Rare Uplands

Tier I habitats consist of habitats that are considered rare by the SDBG (City of San Diego 2018). These habitats have naturally limited distribution patterns and have experienced dramatic reductions in land area coverage compared with historic ranges. These habitats are further threatened by ongoing encroachment from development and anthropogenic pressures.

Coastal Bluff Scrub

Coastal bluff scrub is low, continuous mat or scattered scrub exposed to varying, moisture-laden winds with high salt content (Oberbauer et al. 2008). The shrub layer is up to 6 feet tall and includes dwarf shrubs, herbaceous perennials, annuals, and succulents. Coastal bluff scrub is considered a Tier I sensitive vegetation community according to the SDBG (City of San Diego 2018). Coastal bluff scrub occurs in two MSCP Subarea Plan planning areas.

Maritime Chaparral

Maritime chaparral is low, open chaparral dominated by ceanothus (*Ceanothus* spp.) and manzanita (*Arctostaphylos* spp.). (Oberbauer et al. 2008). Maritime chaparral occurs on weathered sands within the coastal fog belt. Maritime chaparral is considered a Tier I sensitive vegetation community

according to the SDBG (City of San Diego 2018). Maritime chaparral occurs in two MSCP Subarea Plan planning areas.

Maritime Succulent Scrub

Maritime succulent scrub is low, open scrub dominated by drought-deciduous scrubs and stem and leaf succulents (Oberbauer et al. 2008). The ground is usually bare between shrubs and occurs on rocky or sandy soils. Maritime succulent scrub is considered a Tier I sensitive vegetation community according to the SDBG (City of San Diego 2018). Maritime succulent scrub occurs in three MSCP Subarea Plan planning areas.

Native Grassland

Native grassland is characterized by a sparse to dense cover of perennial grasses typically up to 2 feet tall, with many annual wildflowers also present in years with favorable rainfall. Characteristic plant species typically include native grass species such as needle grass (*Stipa* sp.), wild oat (*Avena* spp.), bromes (*Bromus* spp.), and goldfields (*Lasthenia* spp.) (Oberbauer et al. 2008). Native grassland is considered a Tier I sensitive vegetation community according to the SDBG (City of San Diego 2018). Native grassland occurs in all five MSCP Subarea Plan planning areas.

Oak Woodlands

Oak woodland is open to dense woodland dominated by *Quercus* spp. (Oberbauer et al. 2008). The shrub layer is shrubby to poorly developed understory and may include toyon (*Heteromeles arbutifolia*), gooseberry (*Ribes* spp.), or laurel sumac (*Malosma laurina*). The herb component is continuous, dominated by a variety of introduced species (Oberbauer et al. 2008). Oak woodland is considered a Tier I sensitive vegetation community according to the SDBG (City of San Diego 2018). Oak woodland occurs in three MSCP Subarea Plan planning areas.

Scrub Oak Chaparral

Scrub oak chaparral is a dense evergreen chaparral that can reach 20 feet tall and is found on north-facing or otherwise mesic slopes (Oberbauer et al. 2008). On site, scrub oak chaparral is dominated by scrub oak. Other shrub species present include desertbroom (*Baccharis sarothroides*), dusky willow (*Salix melanopsis*), and thick leaf yerba santa *(Eriodictyon crassifolium)*. According to the SDBG, it is considered a Tier I sensitive vegetation community (City of San Diego 2018). Scrub oak chaparral occurs in one MSCP Subarea Plan planning area.

Tier II Habitats – Uncommon Uplands

Coastal Sage Scrub

Coastal sage scrub is a native vegetation community. According to Oberbauer et al. (2008), coastal sage scrub is composed of a variety of soft, low, aromatic shrubs, characteristically dominated by drought-deciduous species—such as California sagebrush (*Artemisia californica*), California buckwheat (*Eriogonum fasciculatum*), and sages (*Salvia* spp.)—with scattered evergreen shrubs, including lemonade berry (*Rhus integrifolia*) and laurel sumac. According to the SDBG, Diegan coastal sage scrub is considered a Tier II sensitive vegetation community (City of San Diego 2018). Diegan coastal sage scrub (including the disturbed variety) is a common vegetation community occurring in all five MSCP Subarea Plan planning areas.

Coastal Sage Scrub/Chaparral

Coastal sage scrub/chaparral, also described as coastal sage–chaparral transition (Oberbauer et al. 2008), is a mix of sclerophyllous, woody chaparral species and drought-deciduous, malacophyllous sage scrub species (Oberbauer et al. 2008). Dominant species include chamise (*Adenostoma fasciculatum*) and California sagebrush. Coastal sage scrub/chaparral is primarily a post-fire successional community (Oberbauer et al. 2008). Generally, laurel sumac, black sage (*Salvia mellifera*), and lemonade berry are more common in coastal sage scrub, while *Ceanothus* spp. and mission manzanita (*Xylococcus bicolor*) are more common in chaparrals. This vegetation community typically occurs at the edges of Diegan coastal sage scrub and chaparral, where species from each vegetation community intertwine.

According to the SDBG, coastal sage scrub/chaparral is considered a Tier II sensitive vegetation community (City of San Diego 2018). Coastal sage scrub–chaparral transition (including the disturbed variety) occurs in one MSCP Subarea Plan planning area.

Tier IIIA – Common Uplands

Chamise Chaparral

Chamise chaparral is a plant community overwhelmingly dominated by chamise (Oberbauer et al. 2008). Typically, between 1 and 3 meters (3.3 and 9.8 feet) in height, stands of chamise are adapted to repeated fires because the species is capable of stump-sprouting following wildfire. Associated species may include manzanita, ceanothus, California buckwheat, deerweed (*Acmispon glaber*), California scrub oak (*Quercus berberidifolia*), lemonade berry, sages, ashy spike-moss (*Selaginella cinerascens*), and yucca (*Yucca* spp.). However, associated species do not comprise a significant portion of the overall cover, and mature stands contain very little herbaceous understory or litter. According to the SDBG, chamise chaparral is considered a Tier IIIA sensitive vegetation community

(City of San Diego 2018). Chamise chaparral (including the disturbed variety) occurs in all five MSCP Subarea Plan planning areas.

Mixed Chaparral

Mixed chaparral is a community of woody shrubs from 5 to 10 feet tall that often forms dense, impenetrable stands (Oberbauer et al. 2008). It develops primarily on mesic north-facing slopes and in canyons and is characterized by crown- or stump-sprouting species that regenerate following fire. This association typically contains chamise, mission manzanita, wild lilac (*Ceanothus* spp.), California scrub oak, and laurel sumac. Due to its high-density cover, there is little or no understory in this community, except for in openings. Mixed chaparral is a common vegetation community occurring in four MSCP Subarea Plan planning areas.

Tier IIIB – Common Uplands

Non-Native Grassland

Non-native grassland consists of dense to sparse cover of annual grasses with flowering culms between 0.5 to 3 feet in height (Oberbauer et al. 2008). In San Diego County, the presence of wild oat (*Avena fatua*), bromes, stork's bill (*Erodium* spp.), and mustard (*Brassica* spp.) are common indicators. In some areas, depending on past disturbance and annual rainfall, annual forbs may be the dominant species; however, it is presumed that grasses will dominate. According to the SDBG, non-native grassland is considered a Tier IIIB sensitive vegetation community (City of San Diego 2018). Non-native grassland occurs in four MSCP Subarea Plan planning areas.

Tier IV – Other Uplands

Agriculture

Agriculture includes lands that support an active agricultural operation (Oberbauer et al. 2008). Agriculture includes a variety of active agricultural operations, including orchards, vineyards, dairies, nurseries, and irrigated fields and pastures. Agricultural areas are maintained, open areas composed of annual and/or perennial crops that can be naturally or artificially seeded and irrigated. Agriculture is considered a Tier IV sensitive vegetation community, according to the SDBG (City of San Diego 2018) and occurs in four MSCP Subarea Plan planning areas.

Disturbed Land

Disturbed land, also described as disturbed habitat (Oberbauer et al. 2008), is a land cover type characterized by a predominance of non-native species, often introduced and established through human action. Oberbauer et al. (2008) describes disturbed land as areas that have been physically disturbed (by previous legal human activity) and are no longer recognizable as a native or

naturalized vegetation association but that continue to retain a soil substrate. Typically, vegetation, if present, is nearly exclusively composed of non-native plant species such as ornamentals or ruderal exotic species (i.e., weeds). Disturbed land is considered a Tier IV sensitive vegetation community according to the SDBG (City of San Diego 2018). Disturbed land is a common vegetation community occurring in all five MSCP Subarea Plan planning areas.

Eucalyptus Woodland

According to Oberbauer et al. (2008), this "naturalized" vegetation community is fairly widespread in Southern California and is considered a woodland habitat. It typically consists of monotypic stands of introduced Australian eucalyptus (*Eucalyptus* spp.) trees. The understory is either depauperate or absent due to high leaf litter, which restricts growth in understory as a result of high levels of allelochemicals. Although eucalyptus woodlands are of limited value to most native plants and animals, they frequently provide nesting and perching sites for several raptor species. Eucalyptus woodland is considered a Tier IV vegetation community according to the SDBG (City of San Diego 2018). Eucalyptus woodland is a common vegetation community occurring in four MSCP Subarea Plan planning areas.

Ornamental Plantings

Ornamental plantings, also described as non-native vegetation (Oberbauer et al. 2008), include trees, shrubs, and annual species that are not native to California. Ornamental plantings in the Project area largely consist of ornamental plantings along roadways or as part of fuel modification adjacent to homes that are not typically artificially irrigated and receive water from precipitation or runoff. Ornamental plantings are considered a Tier IV sensitive vegetation community according to the SDBG (City of San Diego 2018). Ornamental plantings are a common vegetation community occurring in one MSCP Subarea Plan planning area.

Wetland and Non-Wetland Waters

Wetlands

Coastal Salt Marsh

Coastal salt marsh is a wetland habitat that develops at regularly flooded sites within intertidal zones between land and open saltwater (Oberbauer et al. 2008). It is typically dominated by *Frankenia* ssp., *Suaeda* ssp., and *Heliotropium* ssp. Coastal salt marsh is considered a wetlands community according to the SDBG (City of San Diego 2018). Coastal salt marsh is a common vegetation community occurring in three MSCP Subarea Plan planning areas.

Disturbed Wetland

Disturbed wetlands are areas permanently or periodically inundated by water that have been substantially modified by human activity. Disturbed wetland is often unvegetated but may include some scattered native or non-native vegetation. Some characteristic non-native species that may be associated with disturbed wetlands include giant reed (*Arundo donax*), tamarisk (*Tamarix* spp.), eucalyptus, palms (*Phoenix* spp., *Washingtonia* spp.), pampas grass (*Cortaderia* spp.), and Bermudagrass (*Cynodon dactylon*).

Native wetland species, such as willows (*Salix* spp.) and cattails (*Typha* spp.), also may be present at low cover. Disturbed wetlands include portions of wetlands with obvious artificial structures, such as barricades, riprap, piers, or gates. Therefore, Arizona crossings, detention basins, culverts, and ditches would be considered disturbed wetlands. Disturbed wetlands occur throughout the County (Oberbauer et al. 2008). Disturbed wetland is considered a wetlands community according to the SDBG (City of San Diego 2018). Disturbed wetland is a common vegetation community occurring in four MSCP Subarea Plan planning areas.

Disturbed Wetland (Invasive Dominated)

Disturbed wetland (invasive dominated) is composed of monotypic or nearly monotypic stands of giant reed that are fairly widespread in Southern California. Typically, it occurs on moist soils and in streambeds and may be related directly to soil disturbance or the introduction of propagates by grading or flooding. Mapped occurrences may include surrounding native trees. Giant reed often occupies jurisdictional wetlands. Disturbed wetland (invasive dominated) is considered a wetlands community according to the SDBG (City of San Diego 2018). Disturbed wetland (invasive dominated) occurs in one MSCP Subarea Plan planning area.

Freshwater Marsh

Freshwater marsh is a wetland habitat that develops at permanently flooded sites by freshwater lacking a significant current (Oberbauer et al. 2008). Because it is permanently flooded by fresh water, there is an accumulation of deep, peaty soils. It typically is dominated by species such as cattails, sedge (*Carex* spp.), yellow nutsedge (*Cyperus esculentus*), and bulrushes (*Scirpus* spp.). Freshwater marsh is considered a wetlands community according to the SDBG (City of San Diego 2018). Freshwater marsh (including the disturbed variety) is a common vegetation community occurring in four MSCP Subarea Plan planning areas.

Riparian Forest or Woodland

Riparian forest is a wetland habitat that develops along streams and rivers (Oberbauer et al. 2008). Riparian forests are dominated by riparian vegetation, including coast live oak (*Quercus agrifolia*),

arroyo willow (*Salix lasiolepis*), California sycamore (*Platanus racemosa*), and cottonwood (*Populus* spp.), as well as a variety of other wetland plants. Riparian forest is considered a wetlands community according to the SDBG (City of San Diego 2018). Riparian forest (including the disturbed variety) occurs in all five MSCP Subarea Plan planning areas.

Riparian Scrub

Riparian scrub is a wetland habitat dominated by small riparian trees and shrubs and lacks taller riparian trees (Oberbauer et al. 2008). Riparian scrub occurs mostly in major river systems where flood scour occurs (Oberbauer et al. 2008). Characteristic species include arroyo willow, desertbroom, and mulefat (*Baccharis salicifolia*), as well as other wetland shrubs. Riparian scrub is considered a wetlands community according to the SDBG (City of San Diego 2018) and occurs in all five MSCP Subarea Plan planning areas.

Salt Panne

Salt panne is characterized as coastal wetlands that form when mud is deposited by the tides or rivers (Oberbauer et al. 2008). Salt panne are expanses of ground covered in salt or other minerals formed from evaporated water. Salt panne communities typically do not support significant stands of vegetation. Salt panne is considered a wetlands community according to the SDBG (City of San Diego 2018). Salt panne is a common vegetation community occurring in one MSCP Subarea Plan planning area.

Non-Wetland Waters

Marine Habitats

Marine habitats extend from the upper limit of the unvegetated shore to the ocean. Marine habitats occur along the Pacific Ocean coast and includes tidal transition areas. Marine habitat is considered a wetlands community according to the SDBG (City of San Diego 2018). Marine habitats occurs in two MSCP Subarea Plan planning areas.

Natural Flood Channel

Natural flood channel, also described as non-vegetated channel or floodway (Oberbauer et al. 2008), is the sandy, gravelly, or rocky fringe of waterways or flood channels that are earthen-bottom, and unvegetated on a relatively permanent basis. Vegetation may be present but is usually less than 10% total cover and grows on the outer edge of the channel. Natural flood channel is considered a wetlands community according to the SDBG (City of San Diego 2018). Natural flood channel is a common land cover type occurring in all five MSCP Subarea Plan planning areas.

Sensitive Plants

San Diego County is considered a global biodiversity hot spot and has one of the highest floristic diversities of any county in the continental United States. San Diego is the largest city in the County, and it also contains a greater diversity of flora than any other city in the County. There are a total of 685 sensitive plant records within the Project study area (CDFW 2024b; USFWS 2024) and include 29 MSCP Covered Species, 13 Narrow Endemic species, and 15 species with a federally endangered/state endangered or federally threatened/state threatened status. Of the 685 records, 462 records are occurrences/counts of the 29 MSCP Covered Species. Counts of sensitive plant species recorded within each MSCP Subarea Plan planning area in the Project study area are included in Table 4.2-3 and are geographically shown in Appendix C-1; species and statuses are listed in Appendix C-2.

Table 4.2-3
Sensitive Plant Records Within the Project Study Area

MSCP Subarea Plan Planning Area	MSCP Covered Species (record count)	Narrow Endemic Species (record count)	FE/SE or FT/ST Species (record count)	Total of All Sensitive Plant Species (record count)[1]
Northern Area	58	8	15 (14%)	104
Urban Area	159	32	41 (16%)	263
Eastern Area	17	9	3 (18%)	17
Southern Area	92	45	47 (32%)	149
Cornerstone Lands	3	1	2 (33%)	6
N/A[2]	133	43	69 (47%)	146
Total	**462**	**138**	**177**	**685**

Notes: MSCP = Multiple Species Conservation Program; FE = federally endangered; SE = state endangered; FT = federally threatened; ST = state threatened; N/A = not applicable.

1 This total represents MSCP Covered, Narrow Endemic, FE/SE, FT/ST species as well as other non-MSCP covered, sensitive, California Rare Plant Rank species; therefore, count in this column is not the sum of all previous columns.

2 This row represents special-status plant records within the study area but outside of MSCP Subarea Plan boundaries (e.g., within Marine Corps Air Station Miramar).

Sensitive Wildlife

The City contains a variety of urban, agricultural, native, and non-native habitats and land covers that are utilized by locally common and sensitive wildlife species. Undeveloped canyonlands and open space areas, including the MHPA, provide critical movement corridors for these species throughout the City and County. The following section details the sensitive wildlife species that occur within the Project study area that thus have potential to occur in the Project's districts. These species are described in a regional context, and the potential for these species to occur within specific

Districts may differ from this general description. The Project study area supports habitat for upland and riparian wildlife species.

Chaparral, coastal scrub, woodland, riparian, and non-native habitats (e.g., eucalyptus and non-native grassland) within the study area provide foraging and nesting habitat for migratory and resident bird species and other wildlife species. Chaparral, coastal scrub, and woodlands within the Project study area provide cover and foraging opportunities for wildlife species, including reptiles, invertebrates, and mammals. There are 1,294 total sensitive wildlife records within the Project study area (CDFW 2024b; USFWS 2024), which include 858 bird records, 22 mammal records, 302 invertebrate records, 49 reptile records, and 63 amphibian records. Of the 1,294 records, 1,158 are MSCP Covered Species records. Counts of sensitive wildlife species recorded within each MSCP Subarea Plan planning area in the Project study area are included in Table 4.2-4, are geographically shown in Appendix C-1, and are listed in Appendix C-2.

Table 4.2-4
Sensitive Wildlife Records Within the Project Study Area

MSCP Subarea Plan Planning Area	MSCP Covered Species (record count)	FE/SE or FT/ST Species (record count)	Total Sensitive Wildlife Species (record count)[1]
Northern Area	124	126 (89%)	141
Urban Area	501	521 (94%)	557
Eastern Area	33	33 (97%)	34
Southern Area	378	392 (95%)	412
Cornerstone Lands	80	82 (85%)	96
N/A[2]	42	43 (80%)	54
Total	**1,158**	**1,197**	**1,294**

Notes: MSCP = Multiple Species Conservation Program; FE = federally endangered; SE = state endangered; FT = federally threatened; ST = state threatened; N/A = not applicable.

[1] This total represents MSCP Covered, Narrow Endemic, FE/SE, FT/ST species as well as other non-MSCP covered, sensitive species; therefore, count in this column is not the sum of all previous columns.

[2] This row represents special-status wildlife records within the study area but outside of MSCP Subarea Plan boundaries.

Wildlife Corridors and Habitat Linkages

Wildlife corridors are linear features that connect large patches of natural open space and provide avenues for the immigration and emigration of animals. Wildlife corridors contribute to population viability through the following:

1. Ensuring the continual exchange of genes between populations, which helps maintain genetic diversity

2. Providing access to adjacent habitat areas, representing additional territory for foraging and mating
3. Allowing for a greater carrying capacity
4. Providing routes for colonization of habitat lands following local population extinctions or habitat recovery from ecological catastrophes (e.g., fires)

Habitat linkages are patches of native habitat that function to join two larger patches of habitat. They serve as connections between habitat patches and help reduce the adverse effects of habitat fragmentation. Although individual animals may not move through a habitat linkage, the linkage does represent a potential route for gene flow and long-term dispersal. Habitat linkages may serve as both habitat and avenues of gene flow for small animals such as reptiles and amphibians. Habitat linkages may be represented by continuous patches of habitat or by nearby habitat "islands" that function as "stepping stones" for dispersal.

The MSCP defines core and linkage areas as those maintaining ecosystem function and processes, including large animal movement. Each core area is connected to other core areas or to habitat areas outside of the MSCP either through common boundaries or through habitat linkages. Core areas have multiple connections to help ensure that the balance in the ecosystem will be maintained.

Approximately 8,435 acres of the Project study area are within the City's MHPA and, therefore, potentially provide connectivity through natural creeks and tributaries, as well as larger corridors, such as canyonlands and designated open space (Appendix C-1).

Wetlands

The City's LDC Environmentally Sensitive Lands (ESL) Regulations and SDBG (City of San Diego 2018) provide direction for differentiating wetlands from uplands (terrestrial areas) and also make the distinction between naturally occurring wetland areas from artificial wetlands created by human activities. The SDBG state the following:

> Except for areas created for the purposes of wetland habitat or resulting from human actions to create open waters or from the alteration of natural stream courses, it is not the intent of the City to regulate artificially created wetlands in historically non-wetland areas unless they have been delineated as wetlands by the Army Corps of Engineers and/or the California Department of Fish and Wildlife. For the purposes of the ESL, artificially created lakes such as Lake Hodges, artificially channeled floodways such as the Carmel Valley Restoration and Enhancement Project (CVREP) and previously dredged tidal areas such as Mission Bay should be considered wetlands under ESL [regulations].

Naturally occurring wetland vegetation communities that consist of hydrophytic plant species (plants adapted for life in anaerobic soils) are typically characteristic of City and CCC wetland areas (City of San Diego 2018). Many references are available to help identify and classify wetland vegetation communities: Holland (1986), Cowardin et al. (1979), Keeler-Wolf and Sawyer (2009), and Zedler (1987). The *Corps of Engineers Wetland Delineation Manual* (USACE 1987) provides technical information on hydrophytic species.

The City contains a vast expanse of canyon-bottomlands as well as ephemeral and intermittent drainage systems where flows are substantial enough to etch the landscape and create hydrologic indicators, but not sufficient to support hydrophytic vegetation characteristic of wetland habitat. These drainage features would not be considered wetlands according to the definition in the SDBG unless hydrophytic vegetation were established within the hydrologic channel or streambed. However, these features may be considered "waters of the United States" or "waters of the state," which are regulated by USACE, RWQCB, and/or CDFW. Areas that are lacking wetland habitat, hydric soils, and/or wetland hydrology as a result of unauthorized filling of a previously established wetland area would still be considered a "wetland" according to the SDBG and would be regulated as such by the City's ESL guidelines. In addition, the removal of the fill and restoration of the wetlands may be included as a condition of any approvals issued for the project.

4.2.3 REGULATORY SETTING

Federal

Federal Endangered Species Act

Under the federal Endangered Species Act (ESA) of 1973, the Secretary of the Interior and the Secretary of Commerce jointly have the authority to list a species as threatened or endangered (16 USC 1533[c]). Pursuant to the requirements of the ESA, an agency reviewing a proposed project within its jurisdiction must determine whether any federally listed threatened or endangered species may be present in the planning area and determine whether the proposed project would have a potentially significant impact on such species. In addition, the agency is required to determine whether the project is likely to jeopardize the continued existence of any species proposed to be listed under the ESA or result in the destruction or adverse modification of critical habitat proposed to be designated for such species (16 USC 1536[3][4]). USFWS and the National Oceanic and Atmospheric Administration National Marine Fisheries Service are responsible for implementation of the federal ESA.

This legislation is intended to provide a means to conserve the ecosystems upon which endangered and threatened species depend and provide programs for the conservation of those species, thus preventing extinction of plants and wildlife. Under provisions of Section 9(a)(1)(B) of the federal ESA, it is unlawful to take any listed species. "Take" is defined in Section 3(19) of the federal ESA as,

"harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct."

The federal ESA allows for the issuance of incidental take permits for listed species under Section 7, which is generally available for projects that also require other federal agency permits or other approvals, and under Section 10, which provides for the approval of habitat conservation plans on private property without any other federal agency involvement. Upon development of a habitat conservation plan, USFWS can issue incidental take permits for listed species.

USFWS also publishes a list of candidate species. Species on this list receive special attention from federal agencies during environmental review, although they are not protected otherwise under the federal ESA. The candidate species are those for which USFWS has sufficient biological information to support a proposal to list as endangered or threatened.

Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA) (16 USC 703 et seq.) is a federal statute that implements treaties with several countries on the conservation and protection of migratory birds. The number of bird species covered by the MBTA is extensive; the species are listed in Title 50 of the Code of Federal Regulations (CFR), Part 10.13. The regulatory definition of "migratory bird" is broad and includes any mutation or hybrid of a listed species, and also includes any part, egg, or nest of such birds (50 CFR 10.12). Migratory birds are not necessarily federally listed endangered or threatened birds under the ESA.

The MBTA prohibits any action for which the purpose is the take of any migratory bird or any part, nest, or eggs of any such bird. Under the MBTA, "take" is defined as pursue, hunt, shoot, wound, kill trap, capture, or collect, or any attempt to carry out these activities (16 USC 703 et seq.). In December 2017, Department of Interior Principal Deputy Solicitor Jorjani issued a memorandum (M-37050) that interprets the MBTA to only prohibit intentional take. Similarly, the Ninth Circuit Court of Appeals, like the Fifth Circuit and the Eighth Circuit, has held that the MBTA applies only to intended takes. See *Seattle Audubon Soc'y v. Evans*, 952 F.2d 297, 303 (9th Cir. 1991). Unintentional or accidental take is not prohibited. Additionally, Executive Order 13186, Responsibilities of Federal Agencies to Protect Migratory Birds, requires that any project with federal involvement address impacts of federal actions on migratory birds with the purpose of promoting conservation of migratory bird populations (66 FR 3853–3856). Executive Order 13186 requires federal agencies to work with USFWS to develop a memorandum of understanding to promote the conservation of migratory bird populations. USFWS reviews actions that might affect these species.

Local implementation of the MBTA typically involves a qualified biologist conducting a nesting bird survey prior to construction activities between February 1 and September 15. Such surveys are required in all construction areas, including residential, commercial, and industrial land uses where

ornamental trees, shrubs, and ground cover may provide suitable nesting habitat for protected species. A nest avoidance buffer, as determined by the qualified biologist, shall be established and protected from direct and indirect disturbance until breeding activities have been completed.

Federal Wetland Regulation

Federal wetland regulation applicable to the Project is guided by the Clean Water Act (CWA). The purpose of the CWA is to restore and maintain the chemical, physical, and biological integrity of all waters of the United States. Permitting for projects that propose dredge and fill activities in waters of the United States (including wetlands) is overseen by USACE under Section 404 of the CWA. Projects are typically permitted on an individual basis or are covered under one of several approved general or nationwide permits. In addition, under Section 401 of the CWA, an applicant for a federal permit for an activity that may result in a discharge to a water body must obtain certification from the state that the proposed activity will comply with state water quality standards and water quality objectives. Section 401 provides RWQCB with regulatory authority to certify or deny the proposed activity. A Section 401 certification must be obtained from RWQCB prior to issuance of a Section 404 Permit by USACE.

U.S. Army Corps of Engineers

Pursuant to Section 404 of the CWA, USACE regulates the discharge of dredged and/or fill material into "waters of the United States." The term "wetlands" (a subset of waters) is defined in 33 CFR 328.3(c) as "those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas." In the absence of wetlands, the limits of USACE jurisdiction in non-tidal waters, such as intermittent streams, extend to the "ordinary high-water mark," which is defined in 33 CFR 328.3(c).

State

California Environmental Quality Act

The California Environmental Quality Act (CEQA) requires identification of a project's potentially significant impacts on biological resources and feasible mitigation measures and alternatives that could avoid or reduce significant impacts. CEQA Guidelines Section 15380(b)(1) defines endangered animals or plants as species or subspecies whose "survival and reproduction in the wild are in immediate jeopardy from one or more causes, including loss of habitat, change in habitat, overexploitation, predation, competition, disease, or other factors." A rare animal or plant is defined in CEQA Guidelines Section 15380(b)(2) as a species that, although not presently threatened with extinction, exists "in such small numbers throughout all or a significant portion of its range that it

may become endangered if its environment worsens; or … [t]he species is likely to become endangered within the foreseeable future throughout all or a significant portion of its range and may be considered 'threatened' as that term is used in the Federal Endangered Species Act." Additionally, an animal or plant may be presumed to be endangered, rare, or threatened if it meets the criteria for listing, as defined further in CEQA Guidelines Section 15380(c). CEQA also requires identification of a project's potentially significant impacts on riparian habitats (such as wetlands, bays, estuaries, and marshes) and other sensitive natural communities, including habitats occupied by endangered, rare, and threatened species.

California Endangered Species Act

The California Endangered Species Act (CESA) establishes state policy to conserve, protect, restore, and enhance threatened or endangered species and their habitats. Under the CESA, CDFW is responsible for maintaining a list of threatened species and endangered species (California Fish and Game Code, Section 2070). CDFW administers CESA (California Fish and Game Code, Section 2050 et seq.), which prohibits the take of plant and animal species designated by the Fish and Game Commission as endangered or threatened in the State of California. Under CESA Section 86, "take" is defined as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill." CESA Section 2053 stipulates that state agencies may not approve projects that will "jeopardize the continued existence of any endangered species or threatened species or result in the destruction or adverse modification of habitat essential to the continued existence of those species, if there are reasonable and prudent alternatives available consistent with conserving the species or its habitat which would prevent jeopardy."

CESA Sections 2080 through 2085 address the taking of threatened, endangered, or candidate species by stating, "No person shall import into this state, export out of this state, or take, possess, purchase, or sell within this state, any species, or any part or product thereof, that the Commission determines to be an endangered species or a threatened species, or attempt any of those acts, except as otherwise provided in this chapter, the Native Plant Protection Act (California Fish and Game Code, Sections 1900–1913), or the California Desert Native Plants Act (Food and Agricultural Code, Section 80001)."

CDFW also maintains a list of candidate species, which are species that CDFW has formally noticed as under review for addition to the threatened or endangered species list. CDFW also maintains lists of Species of Special Concern, which serve as watch lists. Pursuant to the requirements of the CESA, an agency reviewing a proposed project within its jurisdiction must determine whether any state-listed endangered or threatened species may be present in the area and determine whether the proposed project would have a potentially significant impact on such species. CDFW encourages informal consultation on any proposed project that may impact a candidate species.

California Coastal Act

The CCC was established by voter initiative in 1972 and was made permanent by the California legislature through the adoption of the California Coastal Act (CCA) of 1976 (Public Resources Code Section 30000 et seq.). The CCC, in partnership with coastal cities and counties, plans and regulates the use of land and water in the COZ. Under the CCA, cities and counties are responsible for preparing Local Coastal Programs to obtain authority to issue Coastal Development Permits (CDPs) for projects within their jurisdiction. Local Coastal Programs consist of land use plans, zoning ordinances, zoning maps, and other implementing actions that conform to the policies of the CCA. Until an agency has a fully certified Local Coastal Program, the CCC is responsible for issuing CDPs.

The CCA provides the standard of review for the portions of a project within the COZ and requires findings of project consistency with specific policies related to public access and recreation, habitat protection, visual resources, and water quality, among others, for issuance of a CDP. Section 30007.5 of the CCA requires the CCC to resolve conflicts between CCA policies in a manner that on balance is most protective of coastal resources.

Under the CCA, Section 30107.5, environmentally sensitive habitat areas are "any area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which could be easily disturbed or degraded by human activities and developments." In addition, the CCC regulates impacts to coastal wetlands defined in Section 30121 of the CCA as, "lands within the coastal zone which may be covered periodically or permanently with shallow water and include saltwater marshes, freshwater marshes, open or closed brackish water marshes, swamps, mudflats, and fens." The CCA requires that most development avoid and buffer coastal wetland resources in accordance with Section 30233, including limiting the filling of wetlands to certain allowable uses.

The Project includes 158 undergrounding projects that would occur within the COZ. Should it be determined that a CDP would be necessary for construction of undergrounding projects, the CDP approval process will be determined following verification of City versus CCC jurisdiction (i.e., deferred certification areas) for each utility undergrounding alignment location. Following City issuance of a CDP for the Project, that CDP may have potential to be appealed to CCC because multiple utility alignments occur within appealable zones.

California Coastal Commission Wetlands Regulation

The CCC exercises jurisdiction over wetlands and waters in the COZ under the CCA. The COZ varies in width from a few hundred feet to several miles, and the CCC can take jurisdiction over actions far inland if they are deemed to have significant effect on coastal waters. State wetland buffers within the COZ are required to be 100 feet. Outside the COZ, buffers are determined based upon resource functions and values.

California Fish and Game Code

Under the California Fish and Game Code, CDFW provides protection from take for a variety of species, including fully protected species. "Fully protected" is a legal protective designation administered by CDFW intended to conserve wildlife species that risk extinction within California. Lists have been created for birds, mammals, fish, amphibians, and reptiles.

According to Sections 3511 and 4700 of the California Fish and Game Code, which regulate birds and mammals, respectively, a fully protected species may not be taken or possessed without a permit from the California Fish and Game Commission, and incidental takes of these species are not authorized.

According to Section 3503, it is "unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto." Section 3503.5 states that it is "unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this code or any regulation adopted pursuant thereto." Finally, Section 3513 states that it is "unlawful to take or possess any migratory nongame bird as designated in the Migratory Bird Treaty Act or any part of such migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the Migratory Bird Treaty Act."

For the purposes of these state regulations, CDFW currently defines an active nest as one that is under construction or in use and includes existing nests that are being modified. For example, if a hawk is adding to or maintaining an existing stick nest in a transmission tower, then it would be considered active and covered under these Fish and Game Code sections.

California Department of Fish and Wildlife Wetland Regulation

CDFW exercises jurisdiction over waters of the state under Sections 1600–1616 of the California Fish and Game Code based on the definition of regulated activity provided in Section 1602 of the California Fish and Game Code and the definition of a stream provided in Title 14, Section 1.72 of the California Code of Regulations (CCR).

Section 1602 of the California Fish and Game Code states that "[a]n entity shall not substantially divert or obstruct the natural flow of, or substantially change or use any material from the bed, channel, or bank of, any river, stream, or lake, or deposit or dispose of debris, waste, or other material containing crumbled, flaked, or ground pavement where it may pass into any river, stream, or lake" without notifying CDFW. Title 14, Section 1.72 of the CCR defines a stream a: "a body of water that flows at least periodically or intermittently through a bed or channel having banks and supports fish or other aquatic life. This includes watercourses having a surface or subsurface flow

that supports or has supported riparian vegetation." This definition includes a broad range of vegetation communities, including some that do not contain wetland species but are in a riparian landscape position. CDFW jurisdiction typically extends to the outer limit of riparian vegetation or to the top of bank of an unvegetated stream channel.

Under Section 1603 of the California Fish and Game Code, upon notification, CDFW "shall determine whether the activity may substantially adversely affect an existing fish and wildlife resource." If such a determination is made, CDFW shall reach an agreement with the notifying entity (a Streambed Alteration Agreement) that includes measures to protect the resources CDFW has determined the activity may substantially adversely affect.

State and Regional Water Quality Control Board Wetland Regulation

The intent of the Porter–Cologne Water Quality Control Act is to protect water quality and the beneficial uses of water, and it applies to both surface water and groundwater. Under this law, the State Water Resources Control Board develops statewide water quality plans, and RWQCBs develop basin plans that identify beneficial uses, water quality objectives, and implementation plans. RWQCBs have the primary responsibility to implement the provisions of both statewide and basin plans. Waters regulated under the Porter–Cologne Water Quality Control Act include isolated waters that are no longer regulated by USACE. Developments with impact to jurisdictional waters must demonstrate compliance with the goals of the act by developing Stormwater Pollution Prevention Plans, Standard Urban Storm Water Mitigation Plans, and other measures to obtain a CWA Section 401 certification.

Local

Multiple Species Conservation Program

The City is a participant in the San Diego MSCP, a comprehensive, regional long-term habitat conservation program designed to provide permit issuance authority for take of Covered Species to the local regulatory agencies. The MSCP addresses habitat and species conservation within approximately 900 square miles in the southwestern portion of the County (County of San Diego 1998). It serves as an approved habitat conservation plan pursuant to an approved Natural Community Conservation Plan in accordance with the state Natural Community Conservation Planning Act (County of San Diego 1998).

The MSCP establishes a preserve system designed to conserve large blocks of interconnected habitat having high biological value that are delineated in MHPAs. The City MHPA is a hard-line preserve developed by the City in cooperation with the wildlife agencies, property owners, developers, and environmental groups. The MHPA identifies biological core resource areas and

corridors targeted for conservation, in which only limited development may occur (City of San Diego 1997).

The MSCP identifies 85 plants and animals to be covered under the MSCP plan (Covered Species). Many of these Covered Species are subject to one or more protective designations under state and/or federal law, and some are endemic to San Diego. The MSCP seeks to provide adequate habitat in the preserve to maintain ecosystem functions and persistence of extant populations of the 85 Covered Species while also allowing participating landowners take of Covered Species on lands located outside of the preserve. The purpose of the MSCP is to address species conservation on a regional level and thereby avoid project-by-project biological mitigation, which tends to fragment habitat.

Within the City, the MSCP is implemented through the MSCP Subarea Plan (City of San Diego 1997), which applies within 8,435 acres of the Project. Additionally, portions of the Project are located within and adjacent to MHPAs (City of San Diego 1997).

City of San Diego Multiple Species Conservation Program Subarea Plan

The MSCP Subarea Plan (City of San Diego 1997) encompasses 206,124 acres within the MSCP Subregional Plan area. The Project's study area is located within the northern, urban, southern, and eastern areas of the MSCP Subarea Plan. In addition, the Project occurs on lands that are excluded from the MSCP Subarea Plan, consisting of the Marine Corps Air Station Miramar located east of I-805, west of I-15, and north of California SR-52. The northern area includes the majority of the Los Peñasquitos Lagoon/Canyon, Del Mar Mesa core, and developed and undeveloped land from Black Mountain Ranch to Lopez Canyon and the NCFUA. Urban habitat areas within the MHPA include existing designated open space such as Mission Bay, Tecolote Canyon, Marian Bear Memorial Park, Rose Canyon, San Diego River, the southern slopes along Mission Valley, Carroll and Rattlesnake Canyons, Florida Canyon, Chollas Creek, and a variety of smaller canyon systems. The southern area includes Otay Mesa, Otay River Valley, and Tijuana Estuary and Tijuana River Valley. The eastern area includes East Elliott and Mission Trails Regional Park.

The MSCP Subarea Plan is characterized by urban land uses with approximately three-quarters either built out or retained as open space/park system. The City MHPA is a hard-line preserve developed by the City in cooperation with the wildlife agencies, property owners, developers, and environmental groups. The MHPA identifies biological core resource areas and corridors targeted for conservation, in which only limited development may occur (City of San Diego 1997). The MHPA is considered an urban preserve that is constrained by existing or approved development and consists of habitat linkages connecting several large core areas of habitat. The criteria used to define core and linkage areas involves maintaining ecosystem function and processes, including large animal movement. Each core area is connected to other core areas or to habitat areas outside of the

MSCP either through common boundaries or through linkages. Core areas have multiple connections to help ensure that the balance in the ecosystem will be maintained (City of San Diego 1997). Critical habitat linkages between core areas are conserved in a functional manner with a minimum of 75% of the habitat within identified linkages conserved (City of San Diego 1997). SDBG Section 114 describes specific development regulations pertaining to sensitive biological resources, including wetlands. The City's definition of wetlands is broader than the definition applied by USACE. Guidelines that supplement the development regulation requirements described in this section are provided in the SDBG (City of San Diego 2018).

The SDMC also ranks upland habitat values by rarity and sensitivity. The most sensitive habitats are Tier I, and the least sensitive are Tier IV. The varying mitigation ratios and requirements that mitigation be either in-tier or in-kind are based on the sensitivity of the habitat being affected.

The "Whitebook"

The City of San Diego published *The "Whitebook" Standard Specifications for Public Works Construction* (City of San Diego 2021), which includes many standard practices that result in minimization of impacts to biological resources, including materials suitability, safe construction methods, tree protection, landscape standards, and stormwater protection measures.

Stormwater Standards

A Water Pollution Control Plan (WPCP) would be implemented in conformance with San Diego RWQCB standards, to control runoff and potential discharge of pollutants during and following construction activities. Implementation of these standard stormwater best management practices (BMPs) are expected to substantially control adverse edge effects (e.g., erosion, sedimentation, habitat conversion) during and following construction that occurs both adjacent to and downstream from sensitive biological resources (including the MHPA). Components of the WPCP include the following:

- During construction activities, material stockpiles shall be placed in stockpile areas such that they cause minimal interference with any on-site drainage patterns. This will protect sensitive vegetation from being inundated with sediment-laden runoff.
- Any use or storage of potentially toxic or hazardous substances shall be limited to staging areas at least 50 feet away from any jurisdictional resources. Additional measures shall also be used to prevent the drainage of such materials into the MHPA. No trash, oil, parking, or other construction-related material/activities shall be allowed outside any approved staging or construction limits.
- Indirect impacts from fugitive dust shall be avoided and minimized through watering and other appropriate BMP measures (e.g., utilizing approved haul routes).

- The undercarriage, tires, and any other intervening portions of equipment used will be thoroughly inspected and cleaned prior to and following each utility undergrounding event to remove any invasive plant species seeds, rhizomes, or other propagules, thus limiting the probability of their spread to and from work areas.

Landscape Standards

If vegetation stabilization is identified as being required to provide erosion control, a Revegetation Plan will be prepared prior to implementation of construction and will include the following, in accordance with the SDBG (City of San Diego 2018) and the SDMC, LDC—Landscape Standards (City of San Diego 2016). Habitat revegetation will feature native species that are typical of the area, and erosion control features will include silt fence and straw fiber rolls, where appropriate. The revegetation areas will be monitored and maintained for 25 months to ensure adequate establishment and sustainability of the plantings/seedlings.

Revegetation Plan(s) and Specifications

1. A Revegetation Plan shall be prepared on D-sheets and submitted to the City's Development Services Department (may be completed by Mitigation, Monitoring, and Coordination staff) for review and approval. The plan shall consist of revegetation, planting, irrigation, and erosion control details, including all required graphics, notes, details, specifications, letters, and reports as outlined below.
2. The Revegetation Plan shall be prepared in accordance with the LDC Chapter 14, Article 2, Division 4, the LDC Landscape Standards submittal requirements, and Attachment "B" (General Outline for Revegetation/Restoration Plans) of the SDBG (City of San Diego 2018). The Principal Qualified Biologist (PQB) shall identify and adequately document all pertinent information concerning the revegetation goals and requirements, such as but not limited to, plant/seed palettes, timing of installation, plant installation specifications, method of watering, protection of adjacent habitat, erosion and sediment control, performance/success criteria, inspection schedule by City staff, document submittals, reporting schedule, etc. The plan shall also include comprehensive graphics and notes addressing the ongoing maintenance requirements (after final acceptance by the City). For areas where a water source is not available, irrigation can be completed by a water truck or hand watering. Additionally, it is recommended that planting/seeding occur in the fall or early winter, to the maximum extent practical, in order to minimize the number of water truck or hand watering visits needed.
3. The Revegetation Installation Contractor (RIC), Revegetation Maintenance Contractor (RMC) and PQB, where applicable, shall be responsible for ensuring that for all grading and contouring, clearing, grubbing, installation of plant materials, and any necessary

maintenance activities or remedial actions required during installation and the 120-day plant establishment period are done per approved LCD. The following procedures at a minimum, but not limited to, shall be performed:

a. The RMC shall be responsible for the maintenance of the upland mitigation area for a minimum period of 120 days.

b. At the end of the 120-day period, the PQB shall review the revegetation area to assess the completion of the short-term plant establishment period and submit a report for approval by Mitigation Monitoring Coordination (MMC). If the 120-day plant establishment period success criteria has not been met, an extension may be warranted at the discretion of the PQB.

c. MMC would provide approval in writing to begin the 25-month maintenance and monitoring program.

d. Existing indigenous/native species shall not be pruned, thinned, or cleared in the revegetation area.

e. The revegetation site shall not be fertilized.

f. The RIC is responsible for reseeding (if applicable) if weeds are not removed, within 1 week of written recommendation by the PQB.

g. Weed control measures shall include the following: (1) hand removal, (2) cutting, with power equipment, and (3) chemical control. Hand removal of weeds is the most desirable method of control and would be used wherever possible.

h. Damaged areas shall be repaired immediately by the RIC/RMC. Insect infestations, plant diseases, herbivory, and other pest problems would be closely monitored throughout the 25-month maintenance period. Protective mechanisms such as metal wire netting shall be used, as necessary. Diseased and infected plants shall be immediately disposed of off site in a legally acceptable manner at the discretion of the PQB or Qualified Biological Monitor (City approved). Where possible, biological controls would be used instead of pesticides and herbicides.

City of San Diego Land Development Code Environmentally Sensitive Lands Regulation

The extent of City wetland jurisdiction is determined based on the wetland definitions provided in the ESL regulations. The SDBG (City of San Diego 2018) and MSCP Subarea Plan require that impacts to wetlands, including vernal pools, be avoided and that a sufficient wetland buffer be maintained, as appropriate, to protect resource functions/values. For vernal pools, this includes avoidance of the watershed necessary for the continued viability of the ponding area. Where wetland impacts are unavoidable (determined case-by-case), they would be minimized to the maximum extent practicable and fully mitigated per the SDBG.

Outside the COZ, impacts to wetlands are allowed for Essential Public Projects provided that a deviation finding can be made. The definition of an Essential Public Project provided in LDC Section 143.0510(d)(1)(B)(ii) includes linear infrastructure, consistent with the Project. Additionally, the Project will service the community at large by providing more reliable energy, reducing fire risk associated with aboveground power infrastructure, and reducing maintenance, among other benefits.

A deviation from the ESL regulations may be warranted when an Essential Public Project serving basic infrastructure needs of the community or the region must be implemented and no feasible alternative exists that will comply with the policies and regulation of the ESL. Deviations from wetland requirements in ESL would be considered under the "Essential Public Projects" option when a proposed project(s) meets the required criteria.

Table 4.2-5 provides a summary of how deviation requirements under the "Essential Public Projects" option of the LDC may be met for proposed projects, when additional construction details are developed.

Table 4.2-5
Summary of Compliance with Wetland Deviation Requirements Under Land Development Code Essential Public Project Option for Impacts Outside the Coastal Overlay Zone

Requirement	Example Findings
Project meets Essential Public Project definition as defined in Land Development Code (LDC) Section 143.0150(d)(1) and the San Diego Biology Guidelines (SDBG)	Project consists of linear infrastructure that provides a public benefit through increased energy reliability, improved aesthetics, and reduced fire risk
No Project Alternative does not meet project objectives	The No Project Alternative would not provide the public benefits described above
Wetlands Avoidance Alternative does not meet project objectives	Alternative alignments and alternative construction methods (e.g., jack-and-bore, tunneling) must be shown to be infeasible
Wetland Impact Minimization Alternatives do not meet project objectives	Alternative alignments and alternative construction methods (e.g., jack-and-bore, tunneling) must be shown to be infeasible
Wetland impacts are minimized to the maximum extent practicable	Construction footprint must be shown to be the minimum necessary size to safely implement the project
All impacts are mitigated in accordance with SDBG Table 2a	Mitigation shall be provided in accordance with the SDBG, including identifying the location of any off-site mitigation or credit purchase

Table 4.2-5
Summary of Compliance with Wetland Deviation Requirements Under Land Development Code Essential Public Project Option for Impacts Outside the Coastal Overlay Zone

Requirement	Example Findings
Project does not have a significant adverse impact to the Multiple Species Conservation Program or the Vernal Pool Habitat Conservation Plan	The project, with mitigation, must be shown to not reduce the functions and services of habitats within the Multi-Habitat Planning Area

The SDBG require that impacts to wetlands be allowed only for uses identified in LDC Section 143.0130(d), which includes incidental public service projects, provided that the impacts are unavoidable and the least environmentally damaging feasible alternative and adequate mitigation is provided. An analysis similar to that described above for impacts to wetlands outside the COZ would need to be provided when project construction details are developed.

City of San Diego Public Tree Protection Policy

In 1995, the City recognized the value of developing additional regulations for the community forest when it adopted Resolution No. R-286098, creating the Tree Advisory Board. In 2002, the Tree Advisory Board, now referred to as the Community Forest Advisory Board, began working with City staff to draft an ordinance or policy that would protect community trees, specifically ones that have historical value, by allowing for the designation of these trees as heritage and landmark trees. The purpose of the Public Tree Protection Policy is to provide special policies to protect designated tree resources located in the public rights-of-way, on City-owned open space, and in parks or other publicly owned lands, wherever practical. In addition, the policy will apply to private land restricted by dedicated open space easements. The Public Tree Protection Policy provides a tree protection designation under four categories: landmark trees, heritage trees, parkway resource trees, and preservation grove (City of San Diego 2005).

City of San Diego Vernal Pool Habitat Conservation Plan

The *Final City of San Diego Vernal Pool Habitat Conservation Plan* (VPHCP) area (City of San Diego 2017) encompasses 206,124 acres within the MSCP Subregional Plan area in the southwestern portion of the County. However, the Final VPHCP is a separate conservation plan for vernal pools and species not covered under the MSCP. The five plant and two crustacean species covered by the Final VPHCP are as follows:

- Otay Mesa mint (*Pogogyne nudiuscula*)
- San Diego mesa mint (*Pogogyne abramsii*)

- Spreading navarretia (*Navarretia fossalis*)
- San Diego button-celery (*Eryngium aristulatum* var. *parishii*)
- California Orcutt grass (*Orcuttia californica*)
- Riverside fairy shrimp (*Streptocephalus woottoni*)
- San Diego fairy shrimp (*Branchinecta sandiegonensis*)

The Project study area is covered under the Final VPHCP since it is a public infrastructure program and will be permitted through the City. The covered projects under the Final VPHCP are identified in the MHPA with a hard-line preserve boundary that distinguishes between take-authorized development area and the associated conservation area.

The purpose of the Final VPHCP is to (1) preserve a network of vernal pool habitat in a matrix of open space; (2) protect the biodiversity of these unique wetlands; and (3) define a formal strategy for their long-term conservation, management, and monitoring (City of San Diego 2017). The Final VPHCP considers a seasonally flooded depression to be a vernal pool if it includes one or more indicator species (USACE 1997; Bauder and McMillan 1998) listed in Appendix A of the Final VPHCP (City of San Diego 2017). Projects covered under the Final VPHCP have areas delineated for both development and preservation and/or mitigation. The MHPA hard-line preserve boundaries for covered projects are established after evaluation of habitat and species surveys conducted, evaluation by wildlife agencies, and consideration of how the proposed vernal pool conservation best contributes to the overall Final VPHCP planning effort (City of San Diego 2017).

4.2.4 THRESHOLDS OF SIGNIFICANCE

The City's *CEQA Significance Determination Thresholds* (City of San Diego 2022) and CEQA Guidelines Appendix G contain significance guidelines related to biological resources. The following thresholds are adapted from the City's Significance Thresholds and provide guidance to determine potential significance for biological resources. The Project would have a significant impact to biological resources if it would:

Issue 1: **Result in a substantial adverse impact, either directly or through habitat modifications on any species identified as a candidate, sensitive, or special-status species in the MSCP or other local or regional plans, policies, or regulations, or by CDFW or U.S. Fish and Wildlife Service (USFWS)**

Issue 2: **Result in a substantial adverse impact on any Tier I Habitats, Tier II Habitats, Tier IIIA Habitats, or Tier IIIB Habitats as identified in the SDBG or other**

sensitive natural community identified in local or regional plans, policies, regulations, or by CDFW or USFWS

Issue 3: **Result in a substantial adverse impact on wetlands (including, but not limited to, marsh, vernal pool, riparian, etc.) through direct removal, filling, hydrological interruption, or other means**

Issue 4: **Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP Plan, or impede the use of native wildlife nursery sites**

Issue 5: **Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan, either within the MSCP plan area or in the surrounding region**

Issue 6: **Introduce land use within an area adjacent to the MHPA that would result in adverse edge effects**

Issue 7: **Conflict with any local policies or ordinances protecting biological resources**

Issue 8: **Result in the introduction of invasive species of plants into a natural open space area**

4.2.5 APPROACH AND METHODOLOGY

4.2.5.1 Literature Review

A desktop, programmatic evaluation of biological resources was completed for all individual utilities within undergrounding projects under the Project in order to address potential direct and indirect impacts on biological resources from the proposed Project activities. The resources used to complete this evaluation are listed below:

- CDFW California Natural Diversity Database (CDFW 2024b)
- California Native Plant Society's Rare Plant Inventory (CNPS 2024)
- MSCP Subarea Plan (City of San Diego 1997)
- SDBG (City of San Diego 2018)
- USFWS Species occurrence data (USFWS 2024)
- SanGIS database (SanGIS 2024)

4.2.5.2 Resource Sensitivity Categories

All individual pole and trench locations (i.e., individual utilities) within undergrounding projects identified under the Project were analyzed through a desktop review of existing databases (listed above) for potential impacts to biological resources. This analysis evaluated the "adjacency features" and "location characteristics" of each individual utility. Adjacency features are characteristics of the area surrounding a particular utility that provide information on the types of biological resources present (e.g., adjacency to nearest MHPA boundary, adjacency to recorded sensitive species occurrence[s]) and potential for indirect effects from removal or undergrounding activities conducted at the utility on those resources (Table 4.2-6). Previous projects (e.g. Citywide Pipeline MND PTS 255100) have used 100-feet to assess for adjacency to the MHPA, this PEIR is using a more conservative distance of 200-feet. Location characteristics are those features of a particular utility's actual location (e.g., within the COZ, within riparian habitat) that provide information on the potential for direct impacts on biological resources from Project activities conducted at that particular utility location (Table 4.2-7). All districts will be evaluated for conformance to the MHPA Land Use Adjacency Guidelines at the time of district creation. Should the project be found to be adjacent to the MHPA it will conform with **MM-BIO-3**, as discussed further below.

Table 4.2-6
Adjacency Features

Adjacency Feature Description	Code
None	AF-1
Within 100 feet of riparian habitat	AF-2
Within 200 feet of MHPA	AF-3
Within 100 feet of a species occurrence record(s) for Riverside or San Diego fairy shrimp	AF-4
Within 100 feet of non-MSCP Covered plant species	AF-5
Between 100 and 500 feet from riparian habitat	AF-6
Between 200 and 500 feet of MHPA boundary	AF-7
Within 500 feet from MSCP Covered species occurrence(s)	AF-8
Within 500 feet from MSCP Covered species occurrence(s) with no state/federal listing status	AF-9
Within 500 feet of non-MSCP Covered sensitive species occurrence(s)	AF-10
Within 500 feet of a least Bell's vireo or southwestern willow flycatcher occurrence	AF-11
Within 100 feet of vernal pool watershed	AF-12

Notes: MHPA = Multi-Habitat Planning Area; MSCP = Multiple Species Conservation Program.

Table 4.2-7
Location Characteristics

Location Characteristic Description	Code
Within the coastal zone	LC-1
Within the MHPA	LC-2
Within sensitive native upland vegetation community	LC-3
Within previously developed or disturbed land	LC-4
Within riparian habitat	LC-5
Within vernal pool buffer or watershed	LC-6

Note: MHPA = Multi-Habitat Planning Area.

Following a desktop analysis of the adjacency features and location characteristics associated with each undergrounding project alignment, the utilities were then assigned to one of three overall Resource Sensitivity Categories based on the adjacency features and locations characteristics, which informs the level of additional CEQA analysis expected to be required for work to be authorized, subject to additional review at District creation. Within each Category, all individual utilities were also assigned to a Subcategory using a GIS data intersection. Each Subcategory is defined by its unique combination of adjacency features and location characteristics. Additional details are provided below and the specific characteristic combinations for each Category and Subcategory are shown in Table 4.2-8; each utility location is displayed in Appendix C-1 by Category. The categorization of each utility is subject to change depending on project-specific analysis prepared as the districts come forward. A desktop analysis will be completed for all districts to verify if any portions of the district require further analysis (e.g., surveys and report), based on the categorization below.

Category 1

Category 1 projects are those that, through review of existing GIS data, have been determined not to have potential to impact sensitive biological resources (see additional analysis below). Therefore, the proposed impacts associated with these projects would not be considered significant, and no mitigation would be required. There are three Subcategories for both poles and trenches within Category 1 with generally increasing potential sensitivity from 1.1 through 1.3. The Subcategories, adjacency features, and location characteristics associated with each of the Category 1 projects are shown in Table 4.2-8.

In all cases, existing mapping indicates that Category 1 poles/trenches occur in existing disturbed/developed land covers; are more than 200-feet from the MHPA; more than 100-feet from riparian habitat, vernal pool watersheds or species occurrences; and more than 500-feet from least Bell's vireo or southern willow flycatcher occurrences. Subcategory 1.2 poles/trenches meet the criteria above, but are within 500 feet of riparian habitat or the MHPA. Subcategory 1.3 poles/trenches similarly may be within 500 feet of riparian habitat or the MHPA and may be

between 200 and 500 feet of special status species occurrences. As discussed in more detail in Section 4.2.6, given that these Category 1 utilities are located in existing disturbed/developed land covers, the potential for significant direct or indirect effects on these species is considered to be very low. If subsequent desktop review determines there is a moderate or high potential for direct or indirect effects on habitats, newly added MHPA, jurisdictional aquatic resources, or special status species, such areas may be re-categorized as Category 2 or 3.

Category 2

Category 2 projects are those that, through review of existing GIS data, occur in existing disturbed/developed land covers but are located adjacent to mapped habitat or species occurrences indicating that these projects are unlikely to have significant direct impacts to biological resources, but have the potential for significant indirect impacts, particularly to sensitive wildlife species and/or the MHPA through adjacency. Within Category 2, there are 4 Subcategories for poles and trenches with generally increasing potential sensitivity from 2.1 through 2.4. The Subcategories, adjacency features, and location characteristics associated with each of the Category 2 projects are shown in Table 4.2-8. In all cases, existing mapping indicates that Category 2 poles/trenches occur in existing disturbed/developed land covers (LC-4) and not within any mapped sensitive upland or wetland habitats (LC-3 or LC-5); nor are any of these poles/trenches located within the MHPA (LC-2).

If future desktop analysis confirms that potential significant impacts could occur, based on the location of poles/trenches within the District then additional impact analyses; including at a minimum, drafting of a biological letter report would be required along with potential focused surveys for sensitive wildlife and/or plants. If future desktop analysis indicates that the poles/trenches qualify as Category 1 then no additional studies would be needed.

Category 3

Category 3 projects are those that, through review of existing GIS data, have been determined to occur within sensitive upland or riparian/wetland habitat or within the MHPA and therefore have potentially significant direct and indirect impacts to sensitive biological resources. Within Category 3, there are 5 Subcategories for poles and trenches with generally increasing potential sensitivity from 3.1 through 3.5. The Subcategories, adjacency features, and location characteristics associated with each of the Category 3 projects are shown in Table 4.2-8.

If future desktop analysis confirms that potential significant impacts could occur, based on the location of poles/trenches within the District then additional impact analyses; including at a minimum, drafting of a biological letter report would be required along with potential focused surveys for sensitive wildlife and/or plants. If future desktop analysis indicates that the poles/trenches qualify as Category 1 and no additional studies would be needed.

Table 4.2-8[1]
Pole and Trench Utility Adjacency Features and Location Characteristics

Sub-category	Adjacency Features												Location Characteristics						Total Poles (count)	Total Trenches (count)
	AF-1	*AF-2*	*AF-3*	*AF-4*	*AF-5*	*AF-6*	*AF-7*	*AF-8*	*AF-9*	*AF-10*	*AF-11*	*AF-12*	*LC-1*	*LC-2*	*LC-3*	*LC-4*	*LC-5*	LC-6		
Category 1																				
1.1	o	NP	NP	NP	NP	NP	NP	NP	NP	NP	NP	NP	o	NP	NP	x	NP	NP	*35,007*	*34,420*
1.2	NP	NP	NP	NP	NP	o	o	NP	NP	NP	NP	NP	o	NP	NP	x	NP	NP	*4,205*	*2,885*
1.3	NP	NP	NP	NP	NP	o	o	o	o	o	NP	NP	o	NP	NP	x	NP	NP	*983*	*672*
Subtotal of Poles/Trenches in Category 1:																			*40,195*	*37,977*
Category 2																				
2.1	NP	NP	x	NP	NP	o	NP	NP	NP	NP	NP	NP	o	NP	NP	x	NP	NP	*1,840*	*861*
2.2	NP	NP	NP	NP	NP	o	o	o	o	o	NP	NP	o	NP	NP	x	NP	NP	*90*	*1,552*
2.3	NP	NP	o	NP	NP	o	o	o	o	o	o	NP	o	NP	NP	x	NP	NP	*497*	*1,438*
2.4	NP	o	o	o	o	o	o	o	o	o	o	NP	o	NP	NP	x	NP	NP	*259*	*238*
Subtotal of Poles/Trenches in Category 2:																			*2,686*	*4,089*
Category 3																				
3.1	NP	NP	NP	NP	NP	o	o	o	o	o	NP	NP	o	NP	o	o	o	NP	*381*	*445*
3.2	NP	NP	x	NP	NP	o	NP	o	o	o	NP	NP	o	NP	o	o	o	NP	*250*	*308*
3.3	NP	o	o	NP	o	o	o	o	o	o	NP	o	o	NP	o	o	o	o	*151*	*109*
3.4	NP	o	x	NP	o	o	NP	o	o	o	NP	NP	o	x	o	o	o	NP	*975*	*1,107*
3.5	NP	o	x	o	o	o	NP	o	o	o	o	o	o	x	o	o	o	o	*25*	*40*
Subtotal of Poles/Trenches in Category 3:																			*1,782*	*2,009*
Total Utilities in Project:																			**44,663**	**44,075**

Notes: NP = not present.
"x" represents an adjacency feature or location characteristic that is associated with all pole and trench utilities in a particular Subcategory row.
"o" represents an adjacency feature or location characteristic that may or may not be associated with the pole and trench utilities in a particular Subcategory row.
"NP" indicates that an adjacency feature or location characteristic is not present with any of the pole and trench utilities in the Subcategory row.
[1] These numbers are subject to change upon project-specific analysis as the districts come forward.

4.2.5.3 Direct Impacts

A direct impact is a physical change in the environment, which is caused by, and immediately related to, the project. Trenching, pole removal, utility line installation, staging, and access activities associated with construction of undergrounding projects under the Project could result in direct impacts, including the following:

- Trampling of vegetation during foot access to pole locations in undeveloped areas
- Grading and trenching to install underground utility lines (within developed areas only)
- Human incursion into sensitive habitats
- Abandonment of nests

Lands containing Tier I, II, IIIA, and IIIB habitats (Table 3 from the SDBG) and all wetlands (Tables 2A and 2B from the SDBG) are considered sensitive and declining habitats. All access within these habitats would occur by foot, and no vegetation would be removed as part of the Project; therefore, significant direct impacts are not expected to occur. Although impacts are not anticipated to occur, the following thresholds for impact significance are listed for reference should impacts to these habitats as part of undergrounding projects are determined through construction design to be unavoidable (City of San Diego 2018):

a. Total project upland impacts less than 0.1 acres are not considered significant and would not require mitigation.

b. Total project impacts to non-native grasslands totaling less than 1.0 acre that are completely surrounded by existing urban developments are not considered significant and do not require mitigation (however, this threshold is determined cumulatively for all non-native grassland impacts; see PEIR Chapter 5, Cumulative Impacts).

c. Total project wetland impacts (i.e., within a project) less than 0.01 acres are not considered significant and do not require mitigation. This does NOT apply to vernal pools, road pools supporting listed fairy shrimp, or wetlands within the COZ.

d. Mitigation is not required for impacts to non-native grassland habitat when impacted for the purpose of wetland or other native habitat creation.

e. Habitat mitigation is not required for impacts to manufactured slopes or areas that have been planted with native species for the purpose of erosion control. In order to qualify for this exception, substantiation of previous permits and mitigation must be provided during project review. This does not apply to noise or wildlife avoidance mitigation requirements, as described in Appendix I of the SDBG.

f. Removal/control of non-native plants is not considered to constitute a significant habitat impact for which compensatory habitat acquisition, preservation, or creation for the area impacted is required. However, mitigation for indirect impacts such as erosion control or off-site infestation by non-native species may still be required.

Direct impacts are proposed to occur within lands designated as Tier IV. These Tier IV land covers are not considered to have significant habitat value, and any impacts would not be considered significant. Additionally, lands considered "artificially created wetlands in historically non-wetland areas" (e.g., constructed basins, concrete diversion ditches) would not be considered wetlands, unless they have been delineated as wetlands by USACE and/or CDFW in accordance with the SDBG; therefore, impacts to these areas would not be significant (City of San Diego 2018).

Should unplanned impacts occur to Tier I-IIIB or City wetland habitats, those would be potentially significant and require mitigation. Unavoidable impacts to City wetland habitats would require analysis of alternatives. These findings of avoidance, minimization, and mitigation shall be documented in a biological letter or biological technical reports for review and approval by the City Planning Department.

Any short-term Project impacts that result in the removal of non-native, invasive species where native habitat is revegetated in place are not considered significant and would not require mitigation in accordance with Appendix I of the SDBG, which states, "Removal/control of non-native plants is not considered to constitute a significant habitat impact for which compensatory habitat acquisition, preservation, or creation for the area impacted is required. Mitigation for indirect impacts such as erosion control or off-site infestation by non-native species may be needed" (City of San Diego 2018). Mitigation for indirect impacts related to erosion control is not anticipated to be required based on implementation of various landscape and stormwater standards required under the City's LDC which reduce impacts to less than significant.

Impacts to individual sensitive plant species may occur from foot access to pole locations in undeveloped areas. Aside from impacts to sensitive habitat, these impacts may also be considered significant based on the rarity and extent of the species impacted. In general, conformance with the MSCP Subarea Plan, including provisions to provide habitat mitigation at required ratios should sensitive habitat be unintentionally impacted, would reduce impacts to sensitive plant species to a level that is less than significant. The exception to this are impacts to Narrow Endemic Covered Species and non-Covered Species that are state-listed or federally listed and/or have a California Rare Plant Rank (CRPR) of 1B.1, 1B.2, 2B.1, or 2B.2.

For impacts to Narrow Endemic Covered Species or state-listed or federally listed species, species-specific mitigation is required on a case-by-case basis to reduce impacts to a level that is less than significant. As stated in the SDBG, "It is expected that the majority of CEQA sensitive species not

covered by the MSCP will be adequately mitigated through the habitat based mitigation" (City of San Diego 2018). As such, prior to the start of work for Category 2 or Category 3 projects, an analysis of sensitive species that have a moderate or high potential to occur within or adjacent to individual utilities must be conducted, based on life history and distribution of each species. The results of this analysis and on-site surveys will determine whether the foot access routes can be aligned to avoid these species.

In addition to determinations made in the SDBG for MSCP Covered Species, including Narrow Endemics, non-Covered plant species with a CRPR of 1B.1 or 1B.2, or state- or federally listed species would potentially require species-specific mitigation, if impacts are unavoidable. Plants with a CRPR of 2B.1 or 2B.2 are defined as "fairly threatened in California, but more common elsewhere" (CDFW 2024a). Wildlife with CDFW Species of Special Concern and no other listing status are defined as "experiencing, or formerly experienced, serious (noncyclical) population declines or range retractions (not reversed) that, if continued or resumed, could qualify it for State threatened or endangered status [OR having] naturally small populations exhibiting high susceptibility to risk from any factor(s), that if realized, could lead to declines that would qualify it for State threatened or endangered status" (CDFW 2024d). Dudek has reviewed these CRPR 2B.1 and 2B.2 species and confirmed that habitat mitigation measures (e.g., habitat restoration or land conservation) would reduce impacts to a level that is less than significant because habitat-based mitigation is likely to support habitat for these species.

Impacts to plant species ranked CRPR 4 would not be considered significant because any populations identified on site would not represent a significant percentage of the population in terms of the ability for the species to persist (i.e., CRPR 4 species are not considered "rare" from a statewide perspective). Similarly, impacts to wildlife species that are only Watch List status per CDFW are not considered significant because any populations identified on site would not represent a significant percentage of the population in terms of the ability for the species to persist.

4.2.5.4 Indirect Impacts

Indirect impacts are reasonably foreseeable effects caused by Project implementation on remaining or adjacent biological resources outside the direct construction area, such as downstream effects or increased human presence. Indirect impacts include short-term effects immediately related to utility undergrounding activities and long-term or chronic effects occurring after work is complete. Indirect impacts that would result in loss of area or function of wetlands, Tier I–III uplands, or sensitive species may be considered significant.

For typical development, the City applies a 100-foot-wide avoidance buffer surrounding wetland resources to ensure the value and function of the wetland is maintained. Impacts to these wetland buffers could occur from Project utility undergrounding activities associated with Category 2 and 3

projects (not Category 1) and would be assessed for significance of impacts on a case-by-case basis, both within and outside of the COZ. To the extent feasible, undergrounding projects will be designed to minimize the extent of activities adjacent to wetlands, including the number of access routes, the size of staging areas, and implementation of water pollution BMPs, and are expected to have minimal effect on the functions of wetland buffers since trenching work would only occur in previously developed areas. Additionally, outside the COZ, the width of the wetland buffer may be reduced on a project-by-project basis if the Project Biologist determines that the reduced width will still serve to protect the "functions and values of wetland areas including absorption and slowing of flood waters for flood and erosion control, sediment filtration, water purification, ground water recharge, and the need for upland transitional habitat" and "wildlife habitat (spawning, nesting, rearing, and foraging), food chain productivity, water quality, ground water recharge, and areas for the protection from storm and floodwaters," in accordance with the SDBG (City of San Diego 2018), which will be the case for all project activities conducted within previously developed land.

Direct and indirect impacts to breeding birds, protected under the Migratory Bird Treaty Act, would be avoided through conformance with existing regulations. However, significant indirect impacts to special-status breeding birds may occur if Project activities produce noise or other types of disturbance in proximity to active nests or agency-designated breeding areas, potentially resulting in abandonment of nests or other breeding failure. The SDBG provide required active nest buffers and breeding season dates for Covered Species, including raptors. Project compliance with these requirements are outlined in Section 4.2.8, Mitigation, Monitoring, and Reporting, below.

4.2.6 IMPACTS

Issue 1: Would the proposal have a substantial adverse impact, either directly or through habitat modifications on any species identified as a candidate, sensitive, or special-status species in the MSCP or other local or regional plans, policies, or regulations, or by CDFW or USFWS?

Direct Impacts

All trenching and infrastructure installation is proposed to occur on previously developed lands (e.g., streets, sidewalks); therefore, no direct impacts to species or their habitat from removal of vegetation communities are anticipated.

As described previously in Section 4.2.5, Approach and Methodology, potential direct impacts to sensitive vegetation communities and plant species from trampling during foot-access would be limited to utility locations classified as Category 3 and would only occur temporarily when crews accessed pole locations in open space areas. Impacts associated with Category 1 and 2 projects would not be considered significant since these direct impacts have been determined to be limited

to Tier IV habitats (e.g., disturbed land, previously developed land, invasive-dominated habitats) and/or would not significantly directly affect sensitive plants or wildlife.

Indirect Impacts

Potentially significant short-term indirect impacts include potential for additional vegetation disturbance from human activities, noise generated from equipment, increased human presence, adverse edge effects adjacent to preserves, potential increases in the spread of invasive plant and/or pest species, adverse impacts due to stormwater runoff pollution, and impacts to sensitive plants due to inadvertent exceedance of authorized work limits. Category 1 projects have limited potential to result in indirect impacts to sensitive biological resources because they are not located within or adjacent to habitat areas supporting special-status species and therefore short-term indirect impacts for these projects would be less than significant. Indirect impacts for Category 2 and 3 project would be potentially significant, absent mitigation.

Implementation of mitigation measures (see Section 4.2.8 below), including biological monitoring, as outlined in **Mitigation Measure (MM) BIO-1 (Biological Resource Protection During Construction)**, methods for successful removal of invasive species as outlined in **MM-BIO-2 (Handling of Non-Native Invasive Plant Species),** consistency with the MSCP/MHPA for those Districts determined to be adjacent to the MHPA, as outlined in **MM-BIO-3 (MSCP/MHPA – Land Use Adjacency Guidelines)**, **MM-BIO-4 (Species-Specific Sensitive Plant Mitigation), and MM-BIO-5 (Avoidance of Listed Species Take),** would reduce short-term indirect impacts to special-status plant and wildlife species to less than significant.

Long-term indirect impacts are not expected. In fact, because the Project would underground existing aboveground infrastructure and reduce associated maintenance activities that could function as a deterrent to wildlife movement, it is expected that the Project would result in a reduction of indirect impacts from existing conditions.

Quantification of potentially significant direct and indirect impacts to sensitive species resulting from utility undergrounding activities proposed under the Project at Category 2 and 3 projects may require evaluation of site-specific factors to ensure that the mitigation measures described in Sections 4.2.7 and 4.2.8 are adequately observed at the time of project implementation, as appropriate. Potential project-level impacts related to modifications of habitat suitable for sensitive species would be **potentially significant** absent implementation of **MM-BIO-1** through **MM-BIO-5**.

Issue 2: Would the proposal result in a substantial adverse impact on any Tier I Habitats, Tier II Habitats, Tier IIIA Habitats, or Tier IIIB Habitats as identified in the SDBG .or other sensitive natural community identified in local or regional plans, policies, regulations, or by CDFW or USFWS?

Proposed utility undergrounding activities with potential to impact Tier I, II, IIIA, or IIIB habitats include trampling of vegetation during foot access, potential spread of invasive plant species, and vegetation trimming for utility pole removal. Proposed quantification of potential project-level impacts resulting from construction activities at Category 2 or 3 utilities may require an on-site evaluation by a qualified biologist in order to determine the location of Tier I, II, or III habitat boundaries, the potential for proposed activities to affect these habitats, and the mitigation measures that would be required, if any. Should any unavoidable Project-level impacts to these sensitive vegetation communities (i.e., Tier I–III, which could also support sensitive wildlife) occur, they would be **potentially significant** absent **MM-BIO-1**, **MM-BIO-2**, **MM-BIO-3**, **MM-BIO-6a (Compensatory Wetlands Mitigation)**, and **MM-BIO-6b (Compensatory Uplands Mitigation).** Proposed direct impacts from utility undergrounding activities at Category 1 and 2 projects would not be considered significant since these impacts would primarily be limited to Tier IV habitats (e.g., disturbed land, previously developed land, invasive-dominated habitats) and/or would not substantially affect Tier I–III habitats.

Issue 3: Would the proposal result in a substantial adverse impact on wetlands (including, but not limited to, marsh, vernal pool, riparian, etc.) through direct removal, filling, hydrological interruption, or other means?

Project activities could be conducted at Category 3 projects that occur within wetland or riparian habitat. Work at these utility locations would require an on-site evaluation by a qualified biologist in order to determine the quantity and location of any wetlands (including non-wetland waters) and ensure avoidance. Should any unavoidable impacts occur to wetlands within Category 3 utilities, including areas under the jurisdiction of USACE, RWQCB, and CDFW, those would be **potentially significant** absent **MM-BIO-1, MM-BIO-2, MM-BIO-3, MM-BIO-6a, MM-BIO-7 (Vernal Pool Avoidance, Minimization, and Mitigation)**, and compliance with the stormwater standards outlined in Section 4.2.3, Regulatory Setting. Proposed impacts from construction activities at Category 1 and 2 projects would not have potential to substantially impact wetlands.

Issue 4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP Plan, or impede the use of native wildlife nursery sites?

Some areas where individual pole removal activities are proposed could function as wildlife corridors; however, due to the short-term duration of pole removal activities, significant long-term impacts to native resident, migratory fish, wildlife corridors, or habitat connectivity are not expected to occur. While there would be an initial disruption of wildlife use of these corridors during these temporary construction activities, following completion of construction, aboveground obstructions to wildlife movement (i.e., poles) will have been removed. The Project would not divert or place any permanent structures in any waterway or streambed.

Additionally, although some individual undergrounding projects (Category 2 and 3) would be located within and adjacent to the MHPA and temporary disruption of animal movement within existing corridors could occur from construction activities, it is expected that the Project would ultimately result in a net long-term benefit to these resources through the removal of aboveground utilities because, as is stated above, removal of the aboveground utility infrastructure in these preserve areas would make them more suitable for wildlife movement and habitat linkage compared to existing conditions.

As such, impacts related to the movement of any native resident or migratory fish, wildlife species, or an established native resident or migratory wildlife corridors would be **less than significant**. Furthermore, implementation of **MM-BIO-3** would ensure compliance with the MSCP/MHPA Land Use Adjacency Guidelines for Category 2 or 3 projects determined to be within or adjacent to the MHPA.

Issue 5: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan, either within the MSCP plan area or in the surrounding region?

The City's permit to take Covered Species under the MSCP is based on the concept that 90% of lands within the MHPA will be preserved. Although encroachment into the MHPA is proposed as part of the Project, the overall Project would be considered an Essential Public Project (City of San Diego 2018) and an allowed use within the MHPA. Therefore, the Project would not require a boundary adjustment or result in significant impacts by requiring changes to the MHPA boundaries.

The City's MSCP Subarea Plan and VPHCP list Essential Public Projects as conditionally compatible with the biological objectives of the MSCP and VPHCP and as allowed uses within the City's MHPA. Conditions of compatibility include compliance with applicable sections of the Subarea Plan, including Section 1.4.2 (General Planning Policies and Design Guidelines), Section 1.4.3 (Land Use

Adjacency Guidelines), and Section 1.5 (Framework Management Plan), and of the VPHCP, including Section 4.1.5 (Essential Public Projects) and Section 5.2 (Avoidance and Minimization Measures). A matrix documenting Project compliance with the MSCP, including the sections listed above, is provided in Section 4.5, Land Use of this PEIR (see Table 4.5-2). The Project is a linear infrastructure project and is therefore considered an Essential Public Project under both the MSCP and VPHCP. Based on land use consistency documented in Table 4.5-2, the overall Project complies with the City's MSCP Subarea Plan, VPHCP, SDMC, and SDBG (City of San Diego 2018).

However, there is potential for individual Category 3 (located within the MHPA) undergrounding projects to come forward that would conflict with the MSCP and therefore result in a **potential significant impact**, absent implementation of **MM-BIO-1** through **MM-BIO-7**. Implementation of sensitive resource project measures, MSCP/MHPA Land Use Adjacency Guidelines, compensatory mitigation (including preparation of a wetland deviation for any project within the MHPA that could impact vernal pools), and avoidance and minimization measures as outlined in **MM-BIO-1** through **MM-BIO-7** would ensure that all undergrounding projects comply with the MSCP and reduce the potential impact to **less than significant**.

Issue 6: Would the project introduce land use within an area adjacent to the MHPA that would result in adverse edge effects?

As previously stated in the response to Issue 5, because there are undergrounding projects and utilities within the Project that would occur within and adjacent to the MHPA (certain Category 2 and 3 utilities), the Project is required to document compliance with the MSCP Land Use Adjacency Guidelines (**MM-BIO-3**) and Section 5.2 of the VPHCP (**MM-BIO-7**). As demonstrated in Section 4.5, Table 4.5-2, the overall Project would not conflict with the City's MSCP due to its status as an Essential Public Project. Implementation of the Project will continue to improve long-term land use within the Project area by eliminating aboveground structures; therefore, long-term edge effects are less than significant.

There is the potential, however, for construction activities to result in short-term adverse edge effects to the MHPA at certain Category 2 and 3 projects, which would be **potentially significant** absent mitigation (Category 1 projects are not within or adjacent to the MHPA boundary; therefore, no adverse edge effects would occur at these locations). Implementation of **MM-BIO-1** through **MM-BIO-3** and adherence to the stormwater standards outlined in Section 4.2.3 would limit the potential for significant impacts from adverse edge effects at Category 2 and 3 projects to a level that is **less than significant** through incorporation of WPCP measures, proper biological monitoring measures, methods for successful removal of invasive species, and the implementation of MSCP Land Use Adjacency Guidelines.

Issue 7: Would the project conflict with any local policies or ordinances protecting biological resources?

As mentioned above, the Project is considered an Essential Public Project according to the SDBG, since it will install linear public infrastructure belowground along existing utility alignments. Based on the SDBG, the Project impacts to the MHPA (outside of the COZ), including impacts to wetlands, may be considered an Essential Public Project only if an individual utility is shown to be "located on the least sensitive portions of the site" (City of San Diego 2018). Chapter 7, Alternatives, of this PEIR provides an alternatives analysis, and it is expected that findings prepared to certify the PEIR will be adequate to find that impacts to the MHPA, including wetlands, conform with the Essential Public Project option under the SDBG.

Similarly, the proposed "development" within COZ typically requires an Economically Viable Use Determination. However, this determination is not applicable to a public linear infrastructure project, such as the undergrounding projects that would be proposed under the Project, due to the need for undergrounding to benefit the public and regional native wildlife species and their habitats and not to create an economic use of the property. Any impacts to wetlands within the COZ would be temporary and require restoration, which is an allowable impact for incidental public services activities under Section 143.0141(b), assuming the project is the least environmentally damaging feasible alternative. Therefore, the economic use determination is not provided as part of the Project. Section 4.5 of this PEIR includes an analysis of consistency with the adopted Local Coastal Plans where districts are located. It is expected that this analysis of consistency will be sufficient to demonstrate that impacts to the MHPA, including wetlands, within the COZ are consistent with the allowed use determination provided in the SDBG.

Issue 8: Would the project result in the introduction of invasive species of plants into a natural open space area?

There is a potential for construction activities for Category 2 and 3 projects to result in the introduction of invasive species plants into a natural open space area, which would be **potentially significant** absent mitigation. Implementation of **MM-BIO-1** and **MM-BIO-2** ensure that the project site is properly delineated, construction activities are monitored to prevent the spread of invasive plant species, and invasive species removals occur using proper techniques to avoid introduction of invasive plant species into a natural open space area. With implementation of these measures, the potential for the project to result in the introduction of invasive plant species into a natural open space area is **less than significant.**

4.2.7 SIGNIFICANCE OF IMPACTS

Direct impacts to sensitive vegetation communities (i.e., Tier I–III and Wetlands) and jurisdictional aquatic resources, including resources that may support sensitive species within proposed

Category 3 project locations, would be **less than significant** for proposed Project activities, which would be limited to foot access only in these habitats. However, while unlikely, it is possible that Project activities could result in unavoidable impacts to sensitive vegetation communities if the limits of work are inadvertently exceeded or temporary equipment access is required. These impacts would be **potentially significant**, absent mitigation (**MM-BIO-1**, **MM-BIO-2**, **MM-BIO-3, MM-BIO-6a, and MM-BIO-6b**)**.**

Direct impacts from Project activities to certain sensitive plant species may not be adequately mitigated through habitat-based mitigation, described above. Any impacts to MSCP Narrow Endemic Covered Species or non-Covered Species that are state-listed or federally listed and/or have a CRPR of 1B.1 or 1B.2 that cannot be avoided would be **potentially significant**, absent species-specific mitigation (**MM-BIO-4**).

Direct impacts from Project activities to active nests protected under the Migratory Bird Treaty Act, which may occur at all Category project locations, would be reduced to **less than significant** through conformance with regulatory requirements (see Section 4.2.3 – last paragraph under Migratory Bird Treaty Act). Direct impacts to listed wildlife species or vernal pool and associated species (expected at some Category 3 locations only) would be **potentially significant**, absent **MM-BIO-1**, **MM-BIO-5**, and **MM-BIO-7**, due to the potential for disturbance to adversely affect avian breeding, habitat occupied by western snowy plover (*Charadrius nivosus nivosus*), cactus wren (*Campylorhynchus brunneicapillus*), tricolored blackbird (*Agelaius tricolor*), burrowing owl (*Athene cunicularia*), white-tailed kite *(Elanus leucurus)*, California black rail *(Laterallus jamaicensis coturniculus)*, California least tern (*Sternula antillarum browni*), least Bell's vireo (*Vireo bellii pusillus*), southwestern willow flycatcher (*Empidonax traillii extimus*), light-footed Ridgway's rail (*Rallus obsoletus*), Crotch's bumble bee (*Bombus crotchii*), occupied vernal pools, or active raptor nests.

Short-term indirect impacts at Category 2 and 3 project locations, including short-term edge effects, would be **potentially significant,** absent mitigation measures listed in Section 4.2.8 below, including biological monitoring **(MM-BIO-1**), methods for successful removal of invasive species (**MM-BIO-2)**, conformance with the City's MSCP Land Use Adjacency Guidelines (**MM-BIO-3**), implementation of sensitive plant species protection **(MM-BIO-4)**, and implementation of WPCP measures, as outlined in the City's stormwater standards outlined in Section 4.2.3, which together would reduce short-term indirect impacts to sensitive vegetation communities, sensitive plants, and sensitive wildlife to **less than significant**.

If Project activities are conducted within or adjacent to portions of the MHPA occupied by coastal California gnatcatcher (*Polioptila californica californica*) during the breeding season (Category 2 and 3 project locations only), potential noise impacts during Project activities would be **potentially significant**, absent mitigation **(MM-BIO-1** and **MM-BIO-5)**.

Long-term indirect impacts associated with the spread of invasive plant or pest species would be **potentially significant,** absent implementation of **MM-BIO-2** at Category 2 and 3 project locations.

No long-term interference of fish and wildlife movement would result from implementation of the Project, since all construction activities would underground existing utilities and would not have long-term impacts to any stream, floodplain, or waterbody. Short-term impacts to fish and wildlife movement would be **less than significant** due to the short-term nature of undergrounding activities, urbanized location of most pole and trench locations, and availability of adjacent habitat areas for wildlife movement during undergrounding activities.

Although the Project is an allowed use within the MHPA, certain Category 2 and 3 projects may result in conflicts with the MSCP or VPHCP, resulting in a **potentially significant** impact, absent implementation of **MM-BIO-3** and **MM-BIO-7.**

4.2.8 MITIGATION, MONITORING, AND REPORTING

MM-BIO-1 Biological Resource Protection During Construction.

The following measures will be included in the construction plans for each undergrounding project in the Project that would affect Category 2 or 3 projects (these measures do not apply to Category 1 projects):

A. Biologist Verification – At least 3 days prior to the start of Project undergrounding activities within a district, the Project Biologist shall submit a letter to the City of San Diego (City) Mitigation Monitoring Coordination (MMC) section stating that a Project Biologist (Qualified Biologist), as defined in the City of San Diego's Biological Guidelines (2018), has been retained to implement the project's biological monitoring program. The letter shall include the names and contact information of all persons involved in the biological monitoring of the project.

B. Pre-Construction Meeting – The Qualified Biologist shall attend the pre-construction meeting, discuss the project's biological monitoring program, and arrange to perform any follow-up mitigation measures and reporting including site-specific monitoring, restoration or revegetation, and additional fauna/flora surveys/salvage.

C. Biological Documents – The Qualified Biologist shall submit all required documentation to the MMC verifying that any special mitigation reports, including, but not limited to, maps, plans, surveys, survey timelines, or buffers, are completed or scheduled per City Biology Guidelines, Multiple Species Conservation Program (MSCP), Environmentally Sensitive Lands (ESL) Ordinance, project permit conditions; California Environmental Quality Act (CEQA); endangered species acts (ESAs); and/or other local, state, or federal requirements.

Prior to the start of construction on any Project utility within or immediately adjacent to the Multi-Habitat Planning Area (MHPA), the Environmental Designee (ED)/MMC shall verify that all MHPA boundaries and limits of work have been delineated on all construction documents.

D. BCME – The Qualified Biologist shall present a Biological Construction Mitigation/Monitoring Exhibit (BCME), which includes the biological documents in C above. In addition, the BCME shall include the limits of work, proposed monitoring schedule, restoration/revegetation plans, plant salvage/relocation requirements (e.g., coastal cactus wren plant salvage, burrowing owl exclusions), avian or other wildlife surveys/survey schedules (including general avian nesting and U.S. Fish and Wildlife Service [USFWS] protocol), timing of surveys, wetland buffers, avian construction avoidance areas/noise buffers/ barriers, other impact avoidance areas, and any subsequent requirements determined by the Qualified Biologist and the City Assistant Deputy Director (ADD)/MMC. The BCME shall include a site plan, a written and graphic depiction of the project's biological mitigation/monitoring program, and a schedule. The BCME shall be approved by the MMC and referenced in the construction documents. Where the potential for impacts to biological resources is limited in Category 2 projects (i.e., initial field assessment indicates potential for impact to sensitive biological resources is low), the monitoring program may be limited to pre- and post-construction verification inspections with concurrence from the Project Biologist and MMC/ED. For utilities located in highly sensitive resource areas (Category 3), full-time biological monitors would be required. The BCME shall be approved by the MMC prior to the start of construction.

E. Avian Protection Requirements – To avoid any direct impacts to any species identified as a listed, candidate, sensitive, or special-status species in the MSCP, removal of habitat that supports active nests in the proposed area of disturbance shall occur outside of the breeding season for these species (February 1 to September 15). If removal of habitat in the proposed area of disturbance must occur during the breeding season, the Qualified Biologist shall conduct a pre-construction survey to determine the presence or absence of nesting birds on the proposed area of disturbance. The pre-construction survey shall be conducted within 10 calendar days prior to the start of construction activities (including removal of vegetation). The applicant shall submit the results of the pre-construction survey to the City MMC for review and approval prior to initiating any construction activities. If nesting birds are detected, a letter report in conformance with the City's Biology Guidelines (i.e., appropriate follow-up surveys, monitoring schedules, construction and noise barriers/buffers, etc.) shall be prepared and include proposed measures to be implemented to ensure that take of birds or eggs or disturbance of breeding activities is avoided. The report or mitigation plan shall be submitted to the City for review and approval and implemented to the satisfaction of the City. The City's MMC Section and Biologist shall verify and approve that all measures identified in the report are in place prior to and/or during construction.

F. Resource Delineation – Prior to construction activities, the Qualified Biologist shall supervise the placement of orange construction fencing or equivalent along the limits of disturbance adjacent to sensitive biological habitats and verify compliance with any other project conditions as shown on the BCME to ensure crews remain in the approved work areas. These demarcations will not be required for utility locations with existing structures, such as chain-link fencing, along the limits or utilities that are adjacent to urban and non-sensitive habitat areas. This phase shall include flagging plant specimens and delimiting buffers to protect sensitive biological resources (e.g., habitats/flora and fauna species, including nesting birds) during construction. Appropriate care shall be taken to minimize attraction of nest predators to the site.

G. Pre-Construction Meeting/Education – Prior to the start of any activity where the construction plans for the proposed utility undergrounding work indicates that significant impacts to biological resources may occur, a pre-construction meeting shall be held on site with the following in attendance: the City's Project Manager (PM; or equivalent personnel), an MMC representative, the Project Contractor (PC) (if applicable), and the Qualified Monitoring Biologist (QMB). At this meeting, the QMB shall identify and discuss the mitigation measures that apply to the utility undergrounding activities and the sensitive nature of the adjacent habitat with the crew and PC.

   At the pre-construction meeting, the QMB shall submit to the MMC and City PM a copy of the BCME that identifies areas to be protected, fenced, and monitored. This data shall include all planned locations and design of noise attenuation walls or other devices, if applicable.

   Prior to commencement of utility undergrounding activities, the QMB shall also meet with the PC and the construction crew and conduct an on-site educational session regarding the need to avoid impacts outside of the approved work area and to protect sensitive flora and fauna that may occur at the specific utility location (e.g., explain the avian and wetland buffers and the flag system for removal of invasive species or retention of sensitive plants and clarify acceptable access routes/methods and staging areas).

H. Monitoring – All construction (including access/staging areas) shall be restricted to areas previously identified, proposed for development/staging, or previously disturbed as shown on "Exhibit A" and/or the BCME. The Qualified Biologist shall monitor construction activities as needed to ensure that construction activities do not encroach into biologically sensitive areas, or cause other similar damage, and that the work plan has been amended to accommodate any sensitive species located during the pre-construction surveys. In addition, the Qualified Biologist shall document field activity via the Consultant Site Visit Record (CSVR). The CSVR shall be emailed to the MMC on the first day of monitoring, the first week

of each month, the last day of monitoring, and immediately in the case of any undocumented condition or discovery.

If no deviations from the approved construction plan occur during work, no additional documentation is required. If deviations from the approved construction plan do occur, such as unanticipated impacts to sensitive vegetation communities or unanticipated discharge of pollutants, a Final Monitoring Report shall be prepared within 3 months following the completion of mitigation monitoring efforts detailing construction and monitoring that occurred and any remedial or compensatory measures taken.

I. Subsequent Resource Identification – The Qualified Biologist shall note/act to prevent any new disturbances to habitat, flora, and/or fauna on site (e.g., flag plant specimens for avoidance during access). If active nests or other previously unknown sensitive resources are detected, all project activities that directly impact the resource shall be delayed until species-specific local, state, or federal regulations have been determined and applied by the Qualified Biologist.

In the event that impacts exceed previously allowed amounts, additional impacts shall be mitigated in accordance with City Biology Guidelines, ESL and MSCP, State CEQA, and other applicable local, state, and federal laws. The Qualified Biologist shall submit a final BCME/report to the satisfaction of the City ADD/MMC within 30 days of construction completion.

MM-BIO-2 Handling of Non-Native Invasive Plant Species.

The following measure will be included in the construction plans for each undergrounding project in the Project that would affect Category 2 or 3 projects (this measure does not apply to Category 1 projects):

Where a project involves potential disturbance of non-native invasive plant species (as identified by the California Invasive Plant Council), these plants shall be entirely removed where feasible, and the removal shall be monitored by the Qualified Monitoring Biologist (QMB) to ensure that dispersal of propagules (e.g., seeds, stems) are avoided or minimized. Where removal of plant roots is not feasible (e.g., where erosive flows are predicted), aboveground plant material shall be fully removed and monitored by the QMB. Where aboveground plant material cannot be removed (e.g., due to limited access), herbicides shall be applied by a Licensed Pest Control Advisor, using chemicals permitted as safe within aquatic environments.

MM-BIO-3 MSCP/MHPA – Land Use Adjacency Guidelines.

The City of San Diego (City) shall accurately represent each project's design under the Project on construction plans in conformance with the associated Project, and the City's Multiple Species Conservation Program (MSCP) Land Use Adjacency Guidelines. The construction plans and

subsequent review documents for districts that are considered adjacent to the Multi-Habitat Planning Area (MHPA) shall include the following:

Drainage

All new and proposed parking lots and developed areas in and adjacent to the preserve must not drain directly into the MHPA. All developed and paved areas must prevent the release of toxins, chemicals, petroleum products, exotic plant materials, and other elements that may adversely affect the adjacent MHPA. Instead, runoff shall flow into sedimentation basins, grassy swales, or mechanical trapping devices prior to draining into the MHPA.

Stormwater systems shall be maintained approximately once a year, or as often as needed, to ensure proper functioning. Maintenance shall include dredging out sediments if needed, removing exotic plant materials, and adding chemical-neutralizing compounds (e.g., clay compounds) when necessary and appropriate.

Toxins

Land uses, such as recreation and agriculture, that use chemicals or generate by-products such as manure, that are potentially toxic or impactive to wildlife, sensitive species, habitat, or water quality shall incorporate measures to reduce impacts caused by the application and/or drainage of such materials into the MHPA.

Such measures shall include drainage/detention basins, swales, or holding areas with non-invasive grasses or wetland-type native vegetation to filter out the toxic materials.

Regular maintenance shall be provided.

Lighting

Lighting of all developed areas adjacent to the MHPA shall be directed away from the MHPA. Where necessary, development shall provide adequate shielding with non-invasive plant materials (preferably native), berming, and/or other methods to protect the MHPA and sensitive species from night lighting. Please see San Diego Municipal Code (SDMC) Section 142.0740 for further information if needed.

If lighting is required for nighttime construction, any nighttime lighting would be subject to City Outdoor Lighting Regulations per San Diego Land Development Code (LDC) Section 142.0740, to the maximum extent practicable, and shall be low pressure sodium illumination (or similar) and directed away from conserved habitat and the tops of adjacent trees with potentially nesting raptors, using appropriate placement and shielding.

Landscaping

No invasive non-native plant species shall be introduced into areas adjacent to the MHPA. The landscape plan shall be revised to remove invasive plant species, such as *Cortaderia selloana*, from the planting palette.

Grading/Land Development

Manufactured slopes associated with site development shall be included within the development footprint for projects within or adjacent to the MHPA.

Barriers

Development adjacent to the MHPA shall provide barriers where appropriate (e.g., non-invasive vegetation, rocks/boulders, fences, walls, and/or signage) along the MHPA boundaries to direct public access to appropriate locations and reduce domestic animal predation.

Brush Management

All Zone 1 brush management areas must be included within the development footprint and outside the MHPA. Brush management Zone 2 may be permitted within the MHPA (considered impact neutral) but cannot be used as mitigation.

The amount of woody vegetation clearing shall not exceed 50% of the vegetation existing when the initial clearing is done. Vegetation clearing shall be done consistent with SDMC Section 142.0412 and shall avoid/minimize impacts to covered species to the maximum extent possible. For all new development, regardless of the ownership, the brush management in the Zone 2 area will be the responsibility of a homeowners association or other private party.

Noise

Due to the site's location adjacent to (could also be within) the MHPA, construction noise will need to be avoided, if possible, during the breeding season of the coastal California gnatcatcher (March 1–August 15), least Bell's vireo (March 1–September 15), and southwestern willow flycatcher (May 1–August 30). If construction is proposed during the breeding season for the species, U.S. Fish and Wildlife Service protocol surveys will be required in order to determine species presence/absence.

If the species is/are not identified within the MHPA, no additional measures will be required. If present, measures to minimize noise impacts will be required and shall include noise attenuation measures (e.g. temporary noise walls/berms). If a survey is not conducted and construction is proposed during the species' breeding season, presence would be assumed, and noise attenuation measures (e.g. temporary wall/berm) would be required. Noise levels from construction activities

during the bird breeding season shall not exceed 60 A-weighted decibels (dBA) hourly equivalent sound level (L_{eq}) at the edge of the occupied MHPA, or 3 dBA above the ambient noise level if noise levels already exceed 60 dBA hourly L_{eq}.

MM-BIO-4 Species-Specific Sensitive Plant Mitigation.

Surveys shall be conducted to determine presence/absence for species previously observed or identified as having high or moderate potential based on the presence of suitable habitat within or directly adjacent to Category 2 or 3 projects, prior to construction implementation. For species that can only be reliably detected during specific blooming periods, surveys may need to be conducted during those periods to determine presence/absence. If Multiple Species Conservation Program (MSCP) Narrow Endemic plant species, non-MSCP covered federally and/or state-listed plant species, or non-MSCP covered California Rare Plant Rank (CRPR) 1B.1 or 1B.2 (see table below) species are mapped within the proposed utility undergrounding, access, or staging areas, one of two equally suitable options shall be implemented:

Option 1: Construction undergrounding, access, and/or staging areas shall be modified to avoid or minimize direct impacts to mapped sensitive plant species.

Option 2: An approved Conceptual Restoration Plan shall be implemented or mitigation credits that provide one or more of the following measures shall be acquired:

- Impacted plants would be salvaged and relocated.
- Seeds from impacted plants would be collected for use at an off-site location.
- Off-site habitat that supports the species impacted shall be enhanced and/or supplemented with seed collected on site.
- Comparable habitat supporting the species at an off-site location shall be preserved.

Mitigation that involves relocation, enhancement, or transplanting sensitive plants may be conducted in combination with other habitat mitigation (e.g., wetlands Habitat Mitigation and Monitoring Plan) and shall include the following:

- Conceptual planting plan, including grading and temporary irrigation if necessary to create appropriate habitat conditions to support the species.
- Planting specifications (e.g., seed source, soil suitability, container size).
- Monitoring program including success criteria (e.g., a minimum number of sensitive plant individuals, a minimum percent cover of native species, a maximum percent cover of non-native species).

- Long-term maintenance and preservation plan (e.g., sensitive plant monitoring, adaptive management actions, site security from trespass or vandalism).

Sensitive Plant Species Requiring Species-Specific or Habitat-Based Mitigation

Scientific Name	Common Name	Status (Federal/State/CRPR/MSCP)[1]
Significant, Habitat-Based Mitigation		
Acmispon prostratus	Nuttall's acmispon	None/None/1B.1/Covered
Adolphia californica	California adolphia	None/None/2B.1/None
Ambrosia chenopodiifolia	San Diego bur-sage	None/None/2B.1/None
Ambrosia monogyra	singlewhorl burrobrush	None/None/2B.2/None
Bergerocactus emoryi	golden-spined cereus	None/None/2B.2/None
Bloomeria clevelandii	San Diego goldenstar	None/None/1B.1/Covered
Brodiaea filifolia	thread-leaved brodiaea	FT/SE/1B.1/Covered
Brodiaea orcuttii	Orcutt's brodiaea	None/None/1B.1/Covered
Ceanothus verrucosus	wart-stemmed ceanothus	None/None/2B.2/Covered
Corethrogyne filaginifolia var. *linifolia*	Del Mar Mesa sand aster	None/None/1B.1/Covered
Dicranostegia orcuttiana	Orcutt's bird's-beak	None/None/2B.1/Covered
Dudleya attenuate ssp. *attenuata*	Orcutt's dudleya	None/None/2B.1/None
Dudleya viscida	sticky dudleya	None/None/1B.2/Covered
Ericameria palmeri var. *palmeri*	Palmer's goldenbush	None/None/1B.1/Covered
Eryngium aristulatum var. *parishii*	San Diego button-celery	FE/SE/1B.1/Covered
Euphorbia misera	cliff spurge	None/None/2B.2/None
Ferocactus viridescens	San Diego barrel cactus	None/None/2B.1/Covered
Iva hayesiana	San Diego marsh-elder	None/None/2B.2/None
Leptosyne maritima	sea dahlia	None/None/2B.2/None
Monardella viminea	willowy monardella	FE/SE/1B.1/Covered
Nama stenocarpa	mud nama	None/None/2B.2/None
Pinus torreyana ssp. *torreyana*	Torrey pine	None/None/1B.2/Covered
Pseudognaphalium leucocephalum	white rabbit-tobacco	None/None/2B.2/None
Rosa minutifolia	small-leaved rose	None/SE/2B.1/Covered
Salvia munzii	Munz's sage	None/None/2B.2/None
Senecio aphanactis	chaparral ragwort	None/None/2B.2/None
Significant, Species-Specific Mitigation		
Acanthomintha ilicifolia	San Diego thorn-mint	FT/SE/1B.1/Narrow Endemic
Ambrosia pumila	San Diego ambrosia	FE/None/1B.1/Narrow Endemic

Sensitive Plant Species Requiring Species-Specific or Habitat-Based Mitigation

Scientific Name	Common Name	Status (Federal/State/CRPR/MSCP)[1]
Aphanisma blitoides	aphanisma	None/None/1B.2/Narrow Endemic
Atriplex coulteri	Coulter's saltbush	None/None/1B.2/None
Atriplex pacifica	south coast saltscale	None/None/1B.2/None
California macrophylla	round-leaved filaree	None/None/1B.2/None
Centromadia parryi ssp. *australis*	southern tarplant	None/None/1B.1/None
Centromadia pungens ssp. *laevis*	smooth tarplant	None/None/1B.1/None
Chorizanthe orcuttiana	Orcutt's spineflower	FE/SE/1B.1/None
Chorizanthe polygonoides var. *longispina*	long-spined spineflower	None/None/1B.2/None
Comarostaphylis diversifolia ssp. *diversifolia*	summer holly	None/None/1B.2/None
Corethrogyne filaginifolia var. *incana*	San Diego sand aster	None/None/1B.1/None
Cylindropuntia californica var. *californica*	snake cholla	None/None/1B.1/Narrow Endemic
Deinandra conjugens	Otay tarplant	FT/SE/1B.1/Narrow Endemic
Dudleya blochmaniae ssp. *blochmaniae*	Blochman's dudleya	None/None/1B.1/None
Dudleya variegata	variegated dudleya	None/None/1B.2/Narrow Endemic
Geothallus tuberosus	Campbell's liverwort	None/None/1B.1/None
Hazardia orcuttii	Orcutt's hazardia	None/ST/1B.1/None
Heterotheca sessiliflora ssp. *sessiliflora*	beach goldenaster	None/None/1B.1/None
Isocoma menziesii var. *decumbens*	decumbent goldenbush	None/None/1B.2/None
Lasthenia glabrata ssp. *coulteri*	Coulter's goldfields	None/None/1B.1/None
Monardella stoneana	Jennifer's monardella	None/None/1B.2/None
Navarretia fossalis	spreading navarretia	FT/None/1B.1/Narrow Endemic
Navarretia prostrata	prostrate vernal pool navarretia	None/None/1B.1/None
Phacelia stellaris	Brand's star phacelia	None/None/1B.1/None
Quercus dumosa	Nuttall's scrub oak	None/None/1B.1/None

Sensitive Plant Species Requiring Species-Specific or Habitat-Based Mitigation

Scientific Name	Common Name	Status (Federal/State/CRPR/MSCP)[1]
Sphaerocarpos drewei	bottle liverwort	None/None/1B.1/None
Triquetrella californica	coastal triquetrella	None/None/1B.2/None

Notes: MSCP = Multiple Species Conservation Program.

Status Legend

Federal

FE: Federally listed as endangered

FT: Federally listed as threatened

State

SE: State listed as endangered

ST: State listed as threatened

CRPR: California Rare Plant Rank

1B: Plants rare, threatened, or endangered in California and elsewhere

2B: Plants rare, threatened, or endangered in California, but more common elsewhere

Threat Rank

0.1 – Seriously threatened in California (over 80% of occurrences threatened/high degree and immediacy of threat)

0.2 – Moderately threatened in California (20%–80% occurrences threatened/moderate degree and immediacy of threat)

MM-BIO-5 Avoidance of Listed Species Take.

Prior to the start of work for Category 2 or Category 3 projects, an analysis of sensitive species that have a moderate or high potential to occur within or adjacent to individual utilities must be conducted, based on life history and distribution of each species and presence of suitable habitat within or adjacent to the project.

5A: Coastal California Gnatcatcher, Least Bell's Vireo, and Southwestern Willow Flycatcher

Prior to any project pre-construction meeting associated with the Project, the Environmental Designee (ED)/Mitigation Monitoring Coordination (MMC) shall verify that Multi-Habitat Planning Area (MHPA) as well as any appropriate requirements regarding special-status birds, as specified below, are shown on the project's biological monitoring exhibit(s).

No construction activities shall occur within or adjacent to suitable habitat, as determined during subsequent review at District creation during the breeding seasons of coastal California gnatcatcher (March 1 to August 15), least Bell's vireo (March 15 to September 15), or southwestern willow flycatcher (May 1 to September 1) until the following requirements have been met to the satisfaction of the Assistant Deputy Director (ADD)/MMC:

1. A Qualified Biologist (possessing a valid Endangered Species Act Section 10[a][1][a] Recovery Permit) shall survey those habitat areas within the MHPA that would be subject to construction noise levels exceeding 60 A-weighted decibels (dBA) hourly average for the presence of coastal California gnatcatcher, least Bell's vireo, and southwestern willow flycatcher. Surveys for these species shall be conducted pursuant to the protocol survey guidelines established by the U.S. Fish and Wildlife Service (USFWS) within the breeding season prior to the commencement of any construction. If coastal California gnatcatcher, least Bell's vireo, or southwestern willow flycatcher are present, then the following conditions must be met:

    a. From March 1 through August 15 for coastal California gnatcatcher, March 15 through September 15 for least Bell's vireo, and May 1 through September 1 for southwestern willow flycatcher, no clearing, grubbing, or grading of occupied habitat shall be permitted. Areas restricted from such activities shall be staked or fenced under the supervision of the qualified monitoring biologist; and

    b. From March 1 through August 15 for coastal California gnatcatcher, March 15 through September 15 for least Bell's vireo, and May 1 through September 1 for southwestern willow flycatcher, no construction activities shall occur within any portion of the site where construction activities would result in noise levels exceeding 60 dBA hourly average at the edge of occupied habitat. An analysis showing that noise generated by construction activities would not exceed 60 dBA hourly average at the edge of occupied habitat must be completed by a Qualified Acoustician (possessing current noise engineer license or registration with monitoring noise level experience with listed animal species) and approved by the ADD/MMC at least 2 weeks prior to the commencement of construction activities. Prior to the commencement of construction activities during the breeding season, areas restricted from such activities shall be staked or fenced under the supervision of the qualified monitoring biologist; or

    c. At least 2 weeks prior to the commencement of construction activities, under the direction of a Qualified Acoustician, attenuation measures (e.g., berms, walls) shall be implemented to ensure that noise levels resulting from construction activities would not exceed 60 dBA hourly average at the edge of habitat occupied by coastal California gnatcatcher, least Bell's vireo, and/or southwestern willow flycatcher. Concurrent with the commencement of construction activities and the construction of necessary noise attenuation facilities, noise monitoring shall be conducted at the edge of the occupied habitat area to ensure that levels do not exceed 60 dBA hourly average. If the noise attenuation techniques implemented are determined to be inadequate by the Qualified Acoustician or Biologist, then the associated construction activities shall cease until such time that adequate noise attenuation is achieved or until the end of

the breeding season (August 16 for coastal California gnatcatcher, September 16 for least Bell's vireo, and September 2 for southwestern willow flycatcher). Construction noise monitoring shall continue to be monitored at least twice weekly on varying days, or more frequently depending on the construction activity, to verify that noise levels at the edge of occupied habitat are maintained below 60 dBA hourly average or to the ambient noise level if it already exceeds 60 dBA hourly average. If not, other measures shall be implemented in consultation with the biologist and the ADD/MMC, as necessary, to reduce noise levels to below 60 dBA hourly average or to the ambient noise level if it already exceeds 60 dBA hourly average. Such measures may include, but are not limited to, limitations on the placement of construction equipment and the simultaneous use of equipment.

2. If coastal California gnatcatcher, least Bell's vireo, and/or southwestern willow flycatcher are not detected during the protocol survey, the permitted biologist shall submit substantial evidence to the ADD/MMC and applicable resource agencies that demonstrates whether or not mitigation measures such as noise walls are necessary between March 1 through August 15 for coastal California gnatcatcher, March 15 through September 15 for least Bell's vireo, and/or May 1 through September 1 for southwestern willow flycatcher, and adherence to the following is required:

   a. If this evidence indicates that the potential is high for coastal California gnatcatcher, least Bell's vireo, and/or southwestern willow flycatcher to be present based on historical records or site conditions, then Condition 1(a) through 1(c) shall be adhered to as specified above.

      If this evidence concludes that no impacts to this species are anticipated, no mitigation measures would be necessary.

5B: California Least Tern, Cactus Wren, Tricolored Blackbird, and Western Snowy Plover

If work is proposed at a utility where California least tern, cactus wren, tricolored blackbird, and/or western snowy plover are identified during subsequent review at District creation to have a moderate or high potential to occur, then an agency-approved biologist will perform the following duties prior to the start of construction:

1. The agency-approved biologist shall survey those habitat areas within the MHPA that would be subject to construction noise levels exceeding 60 dBA hourly average for the presence of California least tern, cactus wren, tricolored blackbird, and/or western snowy plover. As required by species, surveys shall be conducted pursuant to any approved protocol survey guidelines established by USFWS or other authorized agency within the breeding season prior to the commencement of any construction. If California least tern, cactus wren,

tricolored blackbird, and/or western snowy plover are determined to be present, then the following conditions must be met:

a. From March 1 to September 15 for western snowy plover, February 15 to August 15 for cactus wren, March 1 to August 1 for tricolored blackbird, and April 1 to September 15 for California least tern, no clearing, grubbing, or grading of occupied habitat shall be permitted. Areas restricted from such activities shall be staked or fenced under the supervision of the qualified monitoring biologist; and

b. From March 1 to September 15 for western snowy plover, February 15 to August 15 for cactus wren, March 1 to August 1 for tricolored blackbird, and April 1 to September 15 for California least tern, no construction activities shall occur within any portion of the site where construction activities would result in noise levels exceeding 60 dBA hourly average at the edge of occupied habitat. An analysis showing that noise generated by construction activities would not exceed 60 dBA hourly average at the edge of occupied habitat must be completed by a Qualified Acoustician (possessing current noise engineer license or registration with monitoring noise level experience with listed animal species) and approved by the ADD/MMC at least 2 weeks prior to the commencement of construction activities. Prior to the commencement of construction activities during the breeding season, areas restricted from such activities shall be staked or fenced under the supervision of the qualified monitoring biologist; or

c. At least 2 weeks prior to the commencement of construction activities, under the direction of a Qualified Acoustician, attenuation measures (e.g., berms, walls) shall be implemented to ensure that noise levels resulting from construction activities would not exceed 60 dBA hourly average at the edge of habitat occupied by western snowy plover, cactus wren, tricolored black bird, and California least tern. Concurrent with the commencement of construction activities and the construction of necessary noise attenuation facilities, noise monitoring shall be conducted at the edge of the occupied habitat area to ensure that levels do not exceed 60 dBA hourly average. If the noise attenuation techniques implemented are determined to be inadequate by the Qualified Acoustician or Biologist, then the associated construction activities shall cease until such time that adequate noise attenuation is achieved or until the end of the breeding season (September 16 for western snowy plover and California least tern, August 16 for cactus wren, and August 2 for tricolored blackbird). Construction noise monitoring shall continue to be monitored at least twice weekly on varying days, or more frequently depending on the construction activity, to verify that noise levels at the edge of occupied habitat are maintained below 60 dBA hourly average or to the ambient noise level if it already exceeds 60 dBA hourly average. If not, other measures shall be implemented in consultation with the biologist and the ADD/MMC, as necessary, to reduce noise levels to below 60 dBA hourly average or to the ambient noise level if it already exceeds 60 dBA

hourly average. Such measures may include, but are not limited to, limitations on the placement of construction equipment and the simultaneous use of equipment.

2. If western snowy plover, cactus wren, tricolored blackbird, and/or California least tern are not detected during the required survey(s), the permitted biologist shall submit substantial evidence to the ADD/MMC and applicable resource agencies that demonstrates whether or not mitigation measures such as noise walls are necessary during the specific breeding seasons for these species, and adherence to the following is required:

   a. If this evidence indicates that the potential is high for western snowy plover, cactus wren, tricolored blackbird, and/or California least tern to be present based on historical records or site conditions, then Condition 1(a) through 1(c) shall be adhered to as specified above.

      If this evidence concludes that no impacts to this species are anticipated, no mitigation measures would be necessary.

5C: Burrowing Owl

If work is proposed at a utility location where burrowing owl have been identified during subsequent review at District creation to have a moderate or high potential to occur, the following species-specific mitigation measure is required to meet Multiple Species Conservation Program (MSCP) Subarea Plan Conditions of Coverage. The mitigation measure would reduce potential impacts to burrowing owl and associated habitat located outside the MHPA (burrowing owl and associated habitat impacts within the MHPA must be avoided).

Prior to Permit or Notice to Proceed Issuance:

a. As districts within the Project have been determined to have burrowing owl occupation potential, the Permit Holder shall submit evidence to the Assistant Deputy Director of the City of San Diego (City) Entitlements verifying that a Biologist possessing qualifications pursuant to the California Department of Fish and Game (CDFG) 2012 Staff Report on Burrowing Owl Mitigation (hereafter referred as the CDFG 2012 Staff Report) has been retained to implement a burrowing owl construction impact avoidance program.

b. Prior to activities that would occur within or adjacent to habitat with potential to support burrowing owl, the Qualified Biologist shall attend the pre-construction meeting to inform construction personnel about the City's burrowing owl requirements and subsequent survey schedule.

Prior to Start of Construction:

a. The Permit Holder and Qualified Biologist must ensure that initial pre-construction/take avoidance surveys of the Project "site" are completed between 14 and 30 days before initial construction activities, including brushing, clearing, grubbing, or grading of the

Project site, regardless of the time of the year. "Site" means the Project site and the area within a radius of 450 feet of the Project site. A report detailing the results of the surveys shall be submitted and approved by the Wildlife Agencies (i.e., USFWS and the California Department of Fish and Wildlife [CDFW]) and/or City MSCP staff prior to construction or burrowing owl eviction(s) and shall include maps of the Project site and burrowing owl locations on aerial photos.

b. The pre-construction survey shall follow the methods described in the CDFG 2012 Staff Report Appendix D.

c. 24 hours prior to commencement of ground-disturbing activities, the Qualified Biologist shall update and report results of pre-construction/take avoidance surveys. Verification shall be provided to the City's MMC Section. If results of the pre-construction surveys have changed and burrowing owl are present in areas not previously identified, immediate notification to the City and Wildlife Agencies shall be provided prior to ground-disturbing activities.

During Construction:

a. Best management practices shall be employed, as burrowing owls are known to use open pipes, culverts, excavated holes, and other burrow-like structures at construction sites. Legally permitted active construction projects that are occupied by burrowing owl and have followed all protocol in this mitigation section, or sites within 450 feet of occupied burrowing owl areas, shall undertake measures to discourage burrowing owls from recolonizing previously occupied areas or colonizing new portions of the site. Such measures include, but are not limited to, ensuring that the ends of all pipes and culverts are covered when they are not being worked on and covering rubble piles, dirt piles, ditches, and berms.

b. Ongoing burrowing owl detection – If burrowing owls or active burrows are not detected during the pre-construction surveys, Section "c" below shall be followed. If burrowing owls or burrows are detected during the pre-construction surveys, Section "d" shall be followed. Neither the MSCP Subarea Plan nor this mitigation section allows for any burrowing owls to be injured or killed outside or within the MHPA; in addition, impacts to burrowing owls within the MHPA must be avoided.

c. Post-Survey Follow-Up if Burrowing Owls and/or Signs of Active Natural or Artificial Burrows Are Not Detected During the Initial Pre-Construction Survey – Monitoring the site for new burrows is required using the protocol in CDFG 2012 Staff Report Appendix D for the period following the initial pre-construction survey, until construction is scheduled to be complete and is complete. (NOTE: Using a projected completion date [that is amended if needed] will allow development of a monitoring schedule that adheres to the required number of surveys in the detection protocol.)

i. If no active burrows are found but burrowing owls are observed to occasionally (1–3 sightings) use the site for roosting or foraging, they shall be allowed to do so with no changes in the construction or construction schedule.

ii. If no active burrows are found but burrowing owls are observed, during follow-up monitoring or repeatedly (4 or more sightings), using the site for roosting or foraging, the City's MMC section shall be notified, and any portion of the site where owls have been sighted and that has not been graded or otherwise disturbed shall be avoided until further notice.

iii. If a burrowing owl begins using a burrow on the site at any time after the initial pre-construction survey, procedures described in Section "b" must be followed.

iv. Any actions other than these require the approval of the City and the Wildlife Agencies.

d. Post-Survey Follow Up if Burrowing Owls and/or Active Natural or Artificial Burrows Are Detected During the Initial Pre-Construction Survey – Monitoring the site for new burrows is required using the protocol in CDFG 2012 Staff Report Appendix D for the period following the initial pre-construction survey, until construction is scheduled to be complete and is complete. (NOTE: Using a projected completion date [that is amended if needed] will allow development of a monitoring schedule that adheres to the required number of surveys in the detection protocol.)

i. This section (d) applies only to sites (including biologically defined territory) wholly outside of the MHPA; all direct and indirect impacts to burrowing owls within the MHPA shall be avoided.

ii. If one or more burrowing owls are using any burrows (including pipes, culverts, debris piles, etc.) on or within 300 feet of the proposed construction area, the City's MMC section and MSCP Section shall be contacted. The City's MMC section shall contact the Wildlife Agencies regarding eviction/collapsing burrows and enlist the appropriate City biologist for ongoing coordination with the Wildlife Agencies and the qualified consulting burrowing owl biologist. No construction shall occur within 300 feet of an active burrow without written concurrence from the Wildlife Agencies. This distance may increase or decrease, depending on the burrow's location in relation to the site's topography, and other physical and biological characteristics.

e. Outside the Breeding Season – If the burrowing owl is using a burrow on site outside the breeding season (i.e., September 1 to January 31), the burrowing owl may be evicted after the qualified burrowing owl biologist has determined via fiber optic camera or other appropriate device, that no eggs, young, or adults are in the burrow. Eviction requires preparation of an Exclusion Plan prepared in accordance with CDFG 2012 Staff Report Appendix E (or most recent

guide available) for review and submittal to the Wildlife Agencies. Written concurrence from the Wildlife Agencies is required prior to Exclusion Plan implementation.

f. During Breeding Season – If a burrowing owl is using a burrow on site during the breeding season (February 1 to August 31), construction shall not occur within 300 feet of the burrow until the young have fledged and are no longer dependent on the burrow, at which time the burrowing owls can be evicted. Eviction requires written concurrence from the Wildlife Agencies prior to implementation.

g. Survey Reporting During Construction – Details of construction surveys and evictions (if applicable) conducted shall be immediately (within 5 working days or sooner) reported to the City's MMC section and the Wildlife Agencies and must be provided in writing (as by email) and acknowledged to have been received by the required Wildlife Agencies and Development Services Department (DSD) staff member(s).

Post Construction:

a. Details of all the surveys and actions undertaken on site with respect to burrowing owls (i.e., occupation, eviction, locations, etc.) shall be reported to the City's MMC section and the Wildlife Agencies within 21 days post-construction and prior to the release of any grading bonds. This report must include summaries of all previous reports for the site and maps of the Project site and burrowing owl locations on aerial photos.

5D: Crotch's Bumble Bee

If work is proposed at a utility location where Crotch's bumble bee have been identified during subsequent review at District creation to have a moderate or high potential to occur, the following species-specific mitigation measure is required to minimize the potential for take of this state candidate endangered species. Should this species no longer be a state candidate for listing or state listed as threatened or endangered at the time of the pre-construction meeting or protocol surveys are completed and determine the species is absent from the project site, then this mitigation measures shall not be required.

1. Prior to the issuance of a Notice to Proceed (NTP) for any construction, the DSD Director's ED/MMC shall review and approve construction documents (plans, specification, details, etc.) to ensure the applicable mitigation monitoring and reporting program (MMRP) requirements are incorporated into the design.

    a. To avoid impacts on Crotch's bumble bee, removal of habitat in the proposed area of disturbance must occur outside of the Colony Active Period between April 1 and August 31. If the removal of habitat in the proposed area of disturbance must occur during the Colony Active Period, a Qualified Biologist shall conduct a pre-activity survey no more

than 3 days prior to the initiation of construction activities to determine the presence or absence of Crotch's bumble bee within the proposed area of disturbance.

b. Surveys must be conducted by a Qualified Biologist meeting the qualifications discussed in the CDFW guidance (i.e., Survey Considerations for CESA Candidate Bumble Bee Species, dated June 6, 2023).

c. The pre-activity survey shall consist of photographic surveys following CDFW guidance (i.e., Survey Considerations for CESA Candidate Bumble Bee Species, dated June 6, 2023). In coordination with CDFW, the Qualified Biologist may be required to send all photo vouchers to a CDFW-approved taxonomist to confirm the identifications of the bumble bees encountered during surveys. The surveys shall consist of passive methods unless a Memorandum of Understanding is obtained from CDFW. If additional activities (e.g., capture or handling) are deemed necessary to identify bumble bees of an unknown species that may be Crotch's bumble bee, then the Qualified Biologist shall obtain the required authorization via a Memorandum of Understanding or Scientific Collecting Permit pursuant to the CDFW 2023 Survey Considerations for CESA Candidate Bumble Bee Species. Survey methods that involve lethal take of species are not acceptable. Survey results will be considered valid until the start of the next colony active period.

d. If pre-activity surveys identify Crotch's bumble bee individuals on site, the Qualified Biologist shall notify and consult with CDFW to establish, monitor, and maintain no-work buffers around the associated floral resources or nest, as appropriate. The size and configuration of the no-work buffer shall be based on the best professional judgment of the Qualified Biologist in consultation with CDFW. Construction activities shall not occur within the no-work buffers until the bees appear no longer active (i.e., associated floral resources appear desiccated and no bees are seen flying for three consecutive days indicating dispersal from the area).

e. If Crotch's bumble bee are identified during species-specific surveys, the owner/permittee shall pursue an Incidental Take Permit from CDFW. Take of any endangered, threatened, or candidate species that results from the project is prohibited, except as authorized by state law (California Fish and Game Code Sections 86, 2062, 2067, 2068, 2080, 2085; 14 CCR 786.9) under the California Endangered Species Act (CESA). Mitigation for direct impacts to Crotch's bumble bee will be fulfilled through compensatory mitigation at a minimum 1:1 nesting habitat replacement of equal or better functions and values to those impacted by the project, or as otherwise determined through the Incidental Take Permit process.

f. Survey data shall be submitted by the Qualified Biologist to the California Natural Diversity Database (CNDDB) in accordance with the Memorandum of Understanding with CDFW, or Scientific Collecting Permit requirements, as applicable.

5E: Fully Protected Species

Fully protected species including white-tailed kite, California black rail, light-footed Ridgway's rail, and California least tern may not be taken or possessed except with take permit authorization from CDFW, and only under specific circumstances. Light-footed Ridgway's rail and California least tern are also listed as endangered by USFWS and would require federal take authorization if take is unavoidable.

If a moderate or high potential for these species is identified during subsequent review at District creation, focused wildlife surveys would be required. Category 1 projects would not require focused surveys for sensitive wildlife species due to lack of suitable habitat present and low potential for construction activities to impact listed species at the utility locations.

1. Prior to the issuance of any NTP, or pre-construction meeting, the City Deputy Director (or appointed designee) shall verify that the MHPA boundaries and the following project requirements regarding the fully protected species are shown on the construction plans where such construction occurs within suitable habitat for these species:

    a. Impacts to fully protected species shall be fully avoided. For construction sites that support suitable habitat for fully protected species, a qualified biologist shall remain on site during all vegetation clearing and perform periodic site inspections (1–2 times/week) during grading and vegetation removal activities. Should a fully protected species nest be detected, a buffer of a minimum of 500 feet shall be established, and no activity shall occur within the buffer zone until the biologist determines and CDFW confirms that all chicks have fledged and are no longer reliant on the nest site.

MM-BIO-6: Compensatory Mitigation

Mitigation ratios for permanent impacts to sensitive upland vegetation communities are determined by their location within or outside of the MHPA. Permanent impacts to wetlands require compensatory mitigation to replace acreage, functions, and services loss in accordance with the SDBG, including ratios for wetlands outlined in Table 2A and uplands in Table 3 of the SDBG. **MM-BIO-6a** and **MM-BIO-6b** apply to Category 3 utilities projects where unavoidable impacts to sensitive vegetation, including wetlands, have potential to occur. Impacts to sensitive vegetation communities or wetlands do not have potential to occur at Category 1 and 2 projects.

MM-BIO-6a: Compensatory Wetlands Mitigation

While not proposed as part of the Project, should any unplanned impacts to sensitive wetlands, including jurisdictional aquatic resources, occur from Project activities, including access and staging, those impacts shall be mitigated in one of the following two equally suitable options: (1) implementation of habitat creation, restoration, enhancement, and/or preservation through an

approved Habitat Mitigation and Monitoring Plan (HMMP) or (2) acquisition of approved mitigation credits, including City of San Diego (City) Advanced Permittee Responsible Mitigation (APRM) sites.

Wetland mitigation required as part of any after-the-fact federal (Clean Water Act Section 404) or state (California Fish and Game Code Sections 1601 and 1603) wetland permit shall supersede and shall not be in addition to any mitigation identified in the Project's California Environmental Quality Act (CEQA) document for those wetland areas covered by any federal or state wetland permit. Wetland habitat outside the jurisdiction of the federal and state permits shall be mitigated in accordance with the CEQA document for those wetland areas covered under any federal or state wetland permit. Wetland habitat outside the jurisdiction of the federal and state permits shall be mitigated in accordance with the CEQA document.

Option 1: Should impacts to wetlands in the coastal zone occur, an HMMP shall be prepared and approved by the City prior to impacts, in accordance with the City of San Diego Municipal Code, Land Development Code—Biology Guidelines (SDBG). Mitigation shall conform with the SDBG, including definitions for creation, restoration, enhancement, and acquisition identified under environmentally sensitive lands (ESL), satisfaction of no net loss by including at least a 1:1 ratio of creation or restoration for all areas of significant impacts to wetlands (see Table 2A of the SDBG), and the protection and notice and management elements.

When proposed mitigation involves habitat enhancement, restoration, or creation, the HMMP shall include the following information:

- Conceptual planting plan including planting zones, grading, and irrigation
- Seed mix/planting palette
- Planting specifications
- Monitoring program including success criteria
- Long-term maintenance and preservation plan

For mitigation that involves habitat acquisition, the HMMP shall include the following:

- Location of proposed acquisition
- Description of the biological resources to be acquired, including support for the conclusion that the acquired habitat mitigates for the specific maintenance impact
- Documentation that the mitigation area would be adequately preserved and maintained in perpetuity

Option 2: Allocation of mitigation site credits, including City APRM, shall include the following:

- Location of approved mitigation site
- Description of the mitigation credits to be acquired, including support for the conclusion that the acquired habitat mitigates for the specific maintenance impact
- Documentation that the credits are associated with a mitigation bank or APRM site that has been approved by the appropriate Resource Agencies
- Documentation in the form of a current mitigation credit ledger

MM-BIO-6b Compensatory Uplands Mitigation.

Impacts to sensitive uplands from utility undergrounding activities, including access and staging, shall be mitigated in accordance with the applicable City Multiple Species Conservation Program (MSCP) mitigation ratios (see Table 3 of the SDBG) through restoration of habitat on site following completion of undergrounding work, through payment into the City's Habitat Acquisition Fund (Fund #10571) (for impacts that are small, isolated sites with lower long-term conservation value, generally considered less than 5 acres, but could, in some cases, may be considered up to 10 acres), as established by City Council Resolution R-275129, adopted on February 12, 1990, or through dedication of credits from the City's Cornerstone Lands Bank or Marron Valley Conservation Bank.

MM-BIO-7 Vernal Pool Avoidance, Minimization, and Mitigation.

The City of San Diego (City) shall implement avoidance and minimization measures in the undergrounding projects' design to ensure direct and indirect impacts to vernal pools are avoided, in accordance with the *Final City of San Diego Vernal Pool Habitat Conservation Plan* (VPHCP), Section 5.2. The City shall accurately represent each undergrounding project's design under the Project on construction plans in conformance with the associated permit conditions, the Project requirements, and the avoidance and minimization measures in Section 5.2 of the City's VPHCP. The construction plans and subsequent review documents for Category 2 or 3 projects that are considered to be adjacent to vernal pools with potential to indirectly impact these aquatic resources shall adhere to the following protocols, which are consistent with the measures listed in Section 5.2 of the City's VPHCP:

- All undergrounding projects that disturb soil adjacent to vernal pools shall require temporary fencing (with silt barriers) of the limits of project impacts (including construction staging areas and access routes) to prevent additional vernal pool impacts and prevent the spread of silt from the construction zone into adjacent vernal pools. Fencing shall be installed in a manner that does not impact habitats to be avoided. Final construction plans shall include photographs that show the fenced limits of impact and all areas of vernal pools to be impacted or avoided. If work inadvertently occurs beyond the fenced or demarcated

limits of impact, all work shall cease until the problem has been remedied to the satisfaction of the City. Temporary construction fencing shall be removed upon project completion.

- Impacts from fugitive dust that may occur during construction grading shall be avoided and minimized through watering and other appropriate measures.
- All contractors and construction personnel shall be trained on the biological resources associated with this project, and it shall be ensure that construction personnel implement training. At a minimum, training shall include the following:

  (1) The purpose for resource protection

  (2) A description of the vernal pool species and their habitat(s)

  (3) The conservation measures that must be implemented during project construction to conserve the vernal pool species, including strictly limiting activities, vehicles, equipment, and construction materials to the fenced project footprint to avoid sensitive resource areas in the field (i.e., avoided areas delineated on maps or on the project site by fencing)

  (4) Environmentally responsible construction practices as outlined in measures 5, 6, and 7

  (5) The protocol to resolve conflicts that may arise at any time during the construction process

  (6) The general provisions of the project's mitigation monitoring and reporting program (MMRP), the need to adhere to the provisions of the Endangered Species Act (ESA), and the penalties associated with violating the ESA

  - Employees shall strictly limit their activities, vehicles, equipment, and construction materials to the fenced project footprint
  - Disposal or temporary placement of excess fill, brush, or other debris shall be limited to areas within the fenced project footprint.
  - Grading activities immediately adjacent to vernal pools shall be timed to avoid wet weather to minimize potential impacts (e.g., siltation) to the vernal pools unless the area to be graded is at an elevation below the pools. To achieve this goal, grading adjacent to avoided pools shall comply with the following:

    a. Grading shall occur only when the soil is dry to the touch both at the surface and 1 inch below. A visual check for color differences (i.e., darker soil indicating moisture) in the soil between the surface and 1 inch below indicates whether the soil is dry.

    b. After a rain of greater than 0.2 inches, grading shall occur only after the soil surface has dried sufficiently as described above, and no sooner than 2 days (48 hours) after the rain event ends.

c. To prevent erosion and siltation from stormwater runoff due to unexpected rains, best management practices (i.e., silt fences) shall be implemented as needed during grading.

d. If rain occurs during grading, work shall stop and resume only after soils are dry, as described above.

e. Grading shall be done in a manner to prevent runoff from entering preserved vernal pools.

f. If necessary, water spraying shall be conducted at a level sufficient to control fugitive dust but not to cause runoff into vernal pools.

g. If mechanized grading is necessary, grading shall be performed in a manner to minimize soil compaction (i.e., use the smallest type of equipment needed to feasibly accomplish the work).

If significant direct or indirect impacts to vernal pools, mitigation would be required in accordance with the City of San Diego Municipal Code, Land Development Code—Biology Guidelines (SDBG) and VPHCP, Sections 5.2 and 5.3 (Compensatory Mitigation), and will include the following:

1. The project proponent shall submit a vernal pool restoration/enhancement/ preservation plan to the City (Development Services Environmental Analysis Section and Planning Department Multiple Species Conservation Program Staff) and Wildlife Agencies (i.e., the California Department of Fish and Wildlife and the U.S. Fish and Wildlife Service) for approval as part of the review process, and the plan shall be included as an attachment to the project's permit documentation. The restoration plan shall be consistent (as applicable) with the restoration plan outline included in SDBG Attachment B. The plan must be approved and implemented prior to or concurrent with project impacts. In addition, the restoration plan shall include the information and conditions outlined in Section 5.3.2 of the VPHCP.
2. The project proponent shall ensure the long-term management of the on-site areas shall occur in perpetuity. Each project proponent shall implement a perpetual management, maintenance, and monitoring plan (e.g., Habitat Management Plan) for their respective biological conservation easement areas. The plan, which shall be approved by the City and Wildlife Agencies, and funding source must be established prior to, or concurrent with, impacts. The plan shall include, but not be limited to, the following: the method of protecting the resources in perpetuity (i.e., covenant of easement dedication to the City, or a deed restriction or other conservation mechanism consistent with California Civil Code Section 815 et seq. and/or Government Code Section 65870) and acceptable to the Wildlife Agencies, monitoring schedule, measures to prevent human and exotic species encroachment, funding mechanism, and contingency measures should problems occur. In addition, the plan shall include the proposed land manager's name, qualifications, business address, and

contact information. The project proponent shall also establish a nonwasting endowment or similar secure funding method in an amount approved by the City and the Wildlife Agencies based on a Property Analysis Record (PAR), or similar cost estimation method, to secure the ongoing funding for the perpetual long-term management, maintenance, and monitoring of the biological conservation easement area by an agency, nonprofit organization, or other entity approved by the City and the Wildlife Agencies.

3. In the event that a new occurrence of a covered species is identified (i.e., previously undocumented) within an area to be impacted by a covered project or covered activity, mitigation shall be required in the form of salvage and restoration for the impact to the new occurrence. Mitigation shall occur consistent with Conditions 1 and 2 above, as well as the SDBG.

4.2.9 SIGNIFICANCE AFTER MITIGATION

Issue 1: Direct and indirect impacts to sensitive plant and wildlife species, including impacts to habitat, are expected to be **less than significant** with implementation of **MM-BIO-1** through **MM-BIO-5**. **BIO-MM-1** would require biological monitoring, resource delineation, avian protection measures, and worker education. **BIO-MM-2** would prevent the spread of invasive plants that could compete with sensitive plant species. **BIO-MM-3** would enforce lighting and noise restrictions and would install MHPA barriers, where appropriate, to prevent disturbance to wildlife during construction activities. **MM-BIO-4** would require focused surveys to determine presence/absence of sensitive plant species either observed or determined to have a high or moderate potential to occur at each utility location (Category 2 or 3) prior to construction. **MM-BIO-5** would ensure that removal of habitat that supports active nests in the proposed area of disturbance would occur outside of the breeding season of these species (February 1 to September 15), where feasible. **MM-BIO-5** would also ensure that prior to the pre-construction meeting, the Environmental Designee/Mitigation Monitoring Coordination shall verify that MHPA boundaries and the requirements regarding the coastal California gnatcatcher, western snowy plover, cactus wren, tricolored blackbird, burrowing owl, California least tern, least Bell's vireo, southwestern willow flycatcher, Crotch's bumble bee, and light-footed Ridgway's rail are shown on the Project's biological monitoring exhibit(s) and implemented during all construction activities, as appropriate. Taken together, these mitigation measures would ensure the that impacts to sensitive plant and wildlife species would be less than significant.

Issues 2 and 3: Direct and indirect impacts to sensitive vegetation communities (i.e., Tier I–III and Wetlands) and jurisdictional aquatic resources, including resources that may support sensitive species, are expected to be **less than significant** since these impacts would be limited to foot-traffic access only. Should unplanned direct impacts from Project activities occur within sensitive vegetation communities or wetlands, those impacts would be significant absent **MM-BIO-6a** and **MM-BIO-6b**. **MM-BIO-6a** would require implementation of habitat creation, restoration, and/or enhancement through an approved HMMP or acquisition of approved mitigation credits, including

City Advanced Permittee Responsible Mitigation (APRM) sites. Currently, third-party mitigation credits are available at mitigation sites located on the San Luis Rey River, and the City has an APRM site on the San Diego River. Additional wetlands mitigation sites are currently being developed by City departments. **MM-BIO-6b** would require payment into the City's Habitat Acquisition Fund (Fund #10571), dedication of credits from the City's Cornerstone Lands Bank, or revegetation of the temporarily disturbed native habitat area. These measures ensure that no net loss of wetland areas will occur within the City and that overall impacts to sensitive vegetation communities are offset through habitat restoration, enhancement, and preservation that preserves habitat for sensitive species, including those covered under the MSCP and not covered under MSCP, such as Crotch's bumble bee.

Regarding **Issues 4 and 5**, impacts would be **less than significant** and would not require mitigation.

Issues 6 and 8: Adverse edge effects to areas adjacent to the MHPA and spread of invasive plant species are expected to be **less than significant** with implementation of **MM-BIO-2** and **MM-BIO-3. MM-BIO-2** would prevent the spread of invasive plant species into adjacent MHPA lands and other natural open areas. **MM-BIO-3** would enforce lighting and noise restrictions, chemical/toxin restrictions, and installation of MHPA barriers where appropriate to prevent negative edge effects.

Regarding **Issue 7,** based on compliance with existing regulations incorporated into the Project, impacts related to compliance with ESL would be **less than significant** and would not require mitigation**.**

4.3 GREENHOUSE GAS EMISSIONS

4.3.1 INTRODUCTION

This section describes the existing greenhouse gas (GHG) emissions setting of the City of San Diego (City) Utilities Undergrounding Program (Project); identifies the applicable regulatory framework; evaluates potential impacts associated with GHG emissions that would result from the Project; identifies mitigation measures, if necessary, to reduce the level of impact associated with implementation of the Project; and identifies the level of significance after mitigation. Information in this section is from applicable environmental plans, including the *City of San Diego Climate Action Plan*, *City of San Diego General Plan*, San Diego Municipal Code (SDMC), and Community Plans.

4.3.2 ENVIRONMENTAL SETTING

The Greenhouse Effect

Climate change refers to any significant change in measures of climate, such as temperature, precipitation, or wind, lasting for an extended period (decades or longer). The greenhouse effect traps heat in the troposphere through a threefold process: short-wave radiation emitted by the sun is absorbed by the earth, the earth emits a portion of this energy in the form of long-wave radiation, and GHGs in the upper atmosphere absorb this long-wave radiation and emit it into space and back toward the earth. This "trapping" of the long-wave (thermal) radiation emitted back toward the earth is the underlying process of the greenhouse effect.

The greenhouse effect is a natural process that contributes to regulating the earth's temperature. Without it, the temperature of the earth would be about 0°F (−18°C) instead of its current 59°F (15°C) (Ma 1998). Global climate change concerns are focused on the extent that human activities are enhancing the greenhouse effect and how to mitigate and adapt to changes in climate.

Greenhouse Gases

Gases that trap heat in the atmosphere are called GHGs. GHGs include, but are not limited to, carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), ozone (O_3), fluorinated gases (hydrofluorocarbons [HFCs], perfluorocarbons [PFCs], sulfur hexafluoride [SF_6] and nitrogen trifluoride), chlorofluorocarbons, and hydrochlorofluorocarbons, in addition to water vapor. Some GHGs, such as CO_2, CH_4, and N_2O, occur naturally and are emitted to the atmosphere through natural processes and human activities. Of these gases, CO_2 and CH_4 are emitted in the greatest quantities from human activities. Manufactured GHGs, which have a much greater heat-absorption potential than CO_2, include fluorinated gases, such as HFCs, PFCs, and SF_6, which are associated with

certain industrial products and processes. A summary of the three most common GHGs and their sources is included in the following text.[1]

Carbon Dioxide. CO_2 is a naturally occurring gas and a by-product of human activities and is the principal anthropogenic GHG that affects the earth's radiative balance. Natural sources of CO_2 include respiration of bacteria, plants, animals, and fungus; evaporation from oceans; volcanic out-gassing; and decomposition of dead organic matter. Human activities that generate CO_2 are from the combustion of coal, oil, natural gas, and wood.

Methane. CH_4 is a flammable gas and is the main component of natural gas. CH_4 is produced through anaerobic (without oxygen) decomposition of waste in landfills, flooded rice fields, animal digestion, decomposition of animal wastes, production and distribution of natural gas and petroleum, coal production, and incomplete fossil fuel combustion.

Nitrous Oxide. Sources of N_2O include soil cultivation practices (microbial processes in soil and water), especially the use of commercial and organic fertilizers, manure management, industrial processes (such as in nitric acid production, nylon production, and fossil-fuel-fired power plants), vehicle emissions, and the use of N_2O as a propellant (such as in rockets, racecars, aerosol sprays).

Global Warming Potential

Gases in the atmosphere can contribute to climate change both directly and indirectly. Direct effects occur when the gas itself absorbs radiation. Indirect radiative forcing occurs when chemical transformations of the substance produce other GHGs, when a gas influences the atmospheric lifetimes of other gases, and/or when a gas affects atmospheric processes that alter the radiative balance of the earth (e.g., affect cloud formation or albedo) (EPA 2024).

The Intergovernmental Panel on Climate Change (IPCC) developed the global warming potential (GWP) concept to compare the ability of each GHG to trap heat in the atmosphere relative to another gas. The GWP of a GHG is defined as the ratio of the time-integrated radiative forcing from the instantaneous release of 1 kilogram of a trace substance relative to that of 1 kilogram of a reference gas (IPCC 2014). The reference gas used is CO_2; therefore, GWP-weighted emissions are measured in metric tons (MT) of CO_2 equivalent (CO_2e).

For example, the GWP for CH_4 is 25 (which means that emissions of 1 MT of CH_4 are equivalent to emissions of 25 MT of CO_2), and the GWP for N_2O is 298, based on the *IPCC Fourth Assessment Report* (IPCC 2007).

1 The descriptions of GHGs are summarized from the Intergovernmental Panel on Climate Change (IPCC) *Second Assessment Report* (IPCC 1995), *IPCC Fourth Assessment Report* (IPCC 2007), California Air Resources Board's *GHG Inventory Glossary* (CARB 2018), and the Environmental Protection Agency's climate change resources (EPA 2024).

Contributions to Greenhouse Gas Emissions

Per the U.S. Environmental Protection Agency (EPA) *Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990 to 2020* (EPA 2022), total United States GHG emissions were approximately 5,981.4 million metric tons (MMT) CO_2e in 2020 (EPA 2022). The primary GHG emitted by human activities in the United States was CO_2, which represented approximately 78.8% of total GHG emissions (4,715.7 MMT CO_2e). The largest source of CO_2, and of overall GHG emissions, was fossil-fuel combustion, which accounted for approximately 92.1% of CO_2 emissions in 2020 (4,343 MMT CO_2). Relative to 1990, gross United States GHG emissions in 2020 were 7.3% lower, down from the high of 15.7% above 1990 levels in 2007. GHG emissions decreased from 2019 to 2020 by 9.0% (590.4 MMT CO_2e), and overall, net emissions (including sinks) decreased 10.6% from 2019 to 2020 and 21.4% from 2005 levels (EPA 2022).

According to California's 2000–2021 GHG emissions inventory (2023 edition), California emitted approximately 381.3 MMT CO_2e in 2021, including emissions resulting from out-of-state electrical generation (CARB 2023). The sources of GHG emissions in California include transportation, industry, electric power production from both in-state and out-of-state sources, residential and commercial activities, agriculture, high-GWP substances, and recycling and waste. Table 4.3-1 presents California GHG emission source categories and their relative contributions to the emissions inventory in 2021.

Table 4.3-1
Greenhouse Gas Sources in California

Source Category	Annual GHG Emissions (MMT CO_2e)	Percent of Total[a]
Transportation	145.6	38.2
Industrial	73.9	19.4
Electric Power	62.4	16.4
Residential and Commercial Uses	38.8	10.2
Agriculture	30.9	8.1
High GWP Substances	21.3	5.6
Recycling and Waste	8.4	2.2
Totals	**381.3**	**100**

Source: CARB 2023.
Notes: GHG = greenhouse gas; MMT CO_2e = million metric tons of carbon dioxide equivalent; GWP = global warming potential.
Emissions reflect the 2021 California GHG inventory.
[a] Total may not sum due to rounding.

Total GHG emissions for the City in 2022 were estimated at approximately 8.6 MMT CO_2e with the transportation sector as the primary contributor, generating approximately 55% of GHG emissions.

Other sources (and percent of total GHG emissions) include electricity (19%), natural gas (221%), solid waste and wastewater (3%), and water (1%) (City of San Diego 2023).

Potential Effects of Climate Change

Globally, climate change has the potential to affect numerous environmental resources through uncertain impacts related to future air temperatures and precipitation patterns. The 2014 *IPCC Synthesis Report* indicated that warming of the climate system is unequivocal, and since the 1950s, many of the observed changes are unprecedented over decades to millennia. Signs that global climate change has occurred include warming of the atmosphere and ocean, diminished amounts of snow and ice, rising sea levels, and ocean acidification (IPCC 2014).

In California, climate change impacts have the potential to affect sea level rise, agriculture, snowpack and water supply, forestry, wildfire risk, public health, and electricity demand and supply. The primary effect of global climate change has been a 0.2°C rise in average global tropospheric temperature per decade, determined from meteorological measurements worldwide between 1990 and 2005. Scientific modeling predicts that continued emissions of GHGs at or above current rates would induce more extreme climate changes during the twenty-first century than were observed during the twentieth century. A warming of about 0.2°C (0.36°F) per decade is projected, and there are identifiable signs that climate change could be taking place.

Although climate change is driven by global atmospheric conditions, climate change impacts are felt locally. A scientific consensus confirms that climate change is already affecting California. The average temperatures in California have increased, leading to more extreme hot days and fewer cold nights; shifts in the water cycle have been observed, with less winter precipitation falling as snow, and both snowmelt and rainwater running off earlier in the year; sea levels have risen; and wildland fires are becoming more frequent and intense due to dry seasons that start earlier and end later (CAT 2010).

An increase in annual average temperature is a reasonably foreseeable effect of climate change. Observed changes over the last several decades across the western United States reveal clear signals of climate change. Statewide average temperatures increased by about 1.7°F from 1895 to 2011, and warming has been greatest in the Sierra Nevada. By 2050, California is projected to warm by approximately 2.7°F above 2000 averages, a threefold increase in the rate of warming over the last century. By 2100, average temperatures could increase by 4.1°F to 8.6°F, depending on emissions levels. Springtime warming—a critical influence on snowmelt—will be particularly pronounced. Summer temperatures will rise more than winter temperatures, and the increases will be greater in inland California, compared to the coast. Heat waves will be more frequent, hotter, and longer. There will be fewer extremely cold nights. A decline of Sierra snowpack, which accounts for

approximately half of the surface water storage in California and much of the state's water supply, by 30% to as much as 90% is predicted over the next 100 years (CAT 2010).

Model projections for precipitation over California continue to show the Mediterranean pattern of wet winters and dry summers with seasonal, year-to-year, and decade-to-decade variability. For the first time, however, several of the improved climate models shift toward drier conditions by the mid-to-late twenty-first century in central and, most notably, Southern California. By late-century, all projections show drying, and half of them suggest 30-year average precipitation will decline by more than 10% below the historical average (CAT 2010).

The California Natural Resources Agency (CNRA) has released four California Climate Change Assessments (2006, 2009, 2012, and 2018), which have addressed the following: acceleration of warming across the state, more intense and frequent heat waves, greater riverine flows, accelerating sea level rise, more intense and frequent drought, more severe and frequent wildfires, more severe storms and extreme weather events, shrinking snowpack and less overall precipitation, and ocean acidification, hypoxia, and warming. In addition to the potential statewide effects of climate change, to address local and regional governments' need for information to support action in their communities, the CNRA Fourth Assessment includes reports for nine regions of the state, including the San Diego region, where the project is located. Key projected climate changes for the San Diego region include the following (CNRA 2019):

- Temperature is projected to increase substantially …. Along with mean temperature, heat wave frequency will increase, with more intensity and longer duration.
- Precipitation will remain highly variable but will change in character, with wetter winters, drier springs, and more frequent and severe droughts punctuated by more intense individual precipitation events.
- Broadly, wildfire risk will likely increase in the future as the climate warms. The risk for large catastrophic wildfires driven by Santa Ana wind events will also likely increase as a result of a drier autumns leading to low antecedent precipitation before the height of the Santa Ana wind season (December and January).
- Sea level along the San Diego County coast is expected to rise …. [H]igh tides combined with elevated shoreline water levels produced by both locally and distantly generated wind-driven waves will drive extreme events. Longer-term sea level will increase rapidly in the second half of the century and will be punctuated by short periods of storm-driven extreme sea levels that will imperil existing infrastructure, structures, and ecosystems with increasing frequency.

4.3.3 REGULATORY SETTING

Federal

Massachusetts vs. EPA. On April 2, 2007, in *Massachusetts v. EPA*, the Supreme Court directed the EPA Administrator to determine whether GHG emissions from new motor vehicles cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare, or whether the science is too uncertain to make a reasoned decision. In making these decisions, the EPA Administrator is required to follow the language of Section 202(a) of the Clean Air Act (CAA). On December 7, 2009, the Administrator signed a final rule with two distinct findings regarding GHGs under Section 202(a) of the CAA:

- The Administrator found that elevated concentrations of GHGs—CO_2, CH_4, N_2O, HFCs, PFCs, and SF_6—in the atmosphere threaten the public health and welfare of current and future generations. This is referred to as the "endangerment finding."
- The Administrator further found the combined emissions of GHGs—CO_2, CH_4, N_2O, and HFCs—from new motor vehicles and new motor vehicle engines contribute to the GHG air pollution that endangers public health and welfare. This is referred to as the "cause or contribute finding."

These two findings were necessary to establish the foundation for regulation of GHGs from new motor vehicles as air pollutants under the CAA.

Federal Vehicle Standards. In response to the U.S. Supreme Court ruling discussed above, the Bush Administration issued Executive Order (EO) 13432 in 2007 directing the EPA, the Department of Transportation, and the Department of Energy to establish regulations that reduce GHG emissions from motor vehicles, non-road vehicles, and non-road engines by 2008. In 2009, the National Highway Traffic Safety Administration (NHTSA) issued a final rule regulating fuel efficiency and GHG emissions from cars and light-duty trucks for model year 2011, and, in 2010, the EPA and NHTSA issued a final rule regulating cars and light-duty trucks for model years 2012–2016.

In 2010, President Obama issued a memorandum directing the Department of Transportation, Department of Energy, EPA, and NHTSA to establish additional standards regarding fuel efficiency and GHG reduction, clean fuels, and advanced vehicle infrastructure. In response to this directive, the EPA and NHTSA proposed stringent, coordinated federal GHG and fuel economy standards for model years 2017–2025 light-duty vehicles. The proposed standards projected to achieve 163 grams per mile of CO_2 in model year 2025, on an average industry fleet-wide basis, which is equivalent to 54.5 miles per gallon if this level were achieved solely through fuel efficiency. The final rule was adopted in 2012 for model years 2017–2021, and NHTSA intends to set standards for model years 2022–2025 in a future rulemaking.

In addition to the regulations applicable to cars and light-duty trucks described above, in 2011, the EPA and NHTSA announced fuel economy and GHG standards for medium- and heavy-duty trucks for model years 2014–2018. The standards for CO_2 emissions and fuel consumption are tailored to three main vehicle categories: combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles. According to the EPA, this regulatory program will reduce GHG emissions and fuel consumption for the affected vehicles by 6%–23% over the 2010 baselines.

In August 2016, the EPA and NHTSA announced the adoption of the phase two program related to the fuel economy and GHG standards for medium- and heavy-duty trucks. The phase two program will apply to vehicles with model year 2018 through 2027 for certain trailers, and model years 2021 through 2027 for semi-trucks, large pickup trucks, vans and all types and sizes of buses and work trucks. The final standards are expected to lower CO_2 emissions by approximately 1.1 billion MT and reduce oil consumption by up to 2 billion barrels over the lifetime of the vehicles sold under the program (EPA and NHTSA 2016).

On April 2, 2018, the EPA, under administrator Scott Pruitt, reconsidered the final determination for light-duty vehicles and withdrew its previous 2017 determination, stating that the current standards may be too stringent and therefore should be revised as appropriate (EPA 2018).

In August 2018, EPA and NHTSA proposed to amend certain fuel economy and GHG standards for passenger cars and light trucks and establish new standards for model years 2021 through 2026. Compared to maintaining the post-2020 standards then in place, the 2018 proposal would increase U.S. fuel consumption by about half a million barrels per day (2% to 3% of total daily consumption, according to the Energy Information Administration) and would impact the global climate by 3/1,000th of one degree Celsius by 2100 (EPA and NHTSA 2018). California and other states have stated their intent to challenge federal actions that would delay or eliminate GHG reduction measures and have committed to cooperating with other countries to implement global climate change initiatives.

In 2019, the EPA and NHTSA published the Safer Affordable Fuel-Efficient Vehicles Rule Part One: One National Program (SAFE-1)(84 FR 51310), which revoked California's authority to set its own GHG emissions standards and set zero-emission vehicle (ZEV) mandates in California. In March 2020, Part Two was issued, which set CO_2 emissions standards and corporate average fuel economy standards for passenger vehicles and light-duty trucks for model years 2021 through 2026. In March 2022, EPA reinstated California's authority under the CAA to implement its own GHG emission standards and ZEV sales mandate. EPA's action concludes its reconsideration of the 2019 SAFE-1 rule by finding that the actions taken under the previous administration as a part of SAFE-1 were decided in error and are now entirely rescinded.

Inflation Reduction Act of 2022

The Inflation Reduction Act was signed into law by President Biden in August 2022. The Act includes specific investment in energy and climate reform and is projected to reduce GHG emissions within the United States by 40% as compared to 2005 levels by 2030. The Act allocates funds to boost renewable energy infrastructure (e.g., solar panels and wind turbines), includes tax credits for the purchase of electric vehicles (EVs), and includes measures that will make homes more energy efficient.

The Inflation Reduction Act authorized the EPA to implement the Greenhouse Gas Reduction Fund program, which is a historic, $27 billion investment to mobilize financing and private capital to combat the climate crisis and ensure American economic competitiveness. The Greenhouse Gas Reduction Fund will be designed to achieve the following program objectives: reduce GHG emissions and other air pollutants; deliver the benefits of GHG- and air-pollution-reducing projects to American communities, particularly low-income and disadvantaged communities; and mobilize financing and private capital to stimulate additional deployment of GHG- and air-pollution-reducing projects (EPA 2023).

The Inflation Reduction Act confirms that reduction of GHGs is a core goal of the CAA and that the funding provided should allow the EPA to increase the scope of its CAA rulemakings. The Act also confirms applicability of the Inflation Reduction Act to GHGs in three specific areas: (1) California's ability to regulate GHG emissions from vehicles; (2) the EPA's authority to regulate CH_4 emissions from oil and gas facilities; and (3) the EPA's authority to regulate GHG emissions from power plants.

State

The statewide GHG emissions regulatory framework is summarized below by category: state climate change targets, building energy, renewable energy and energy procurement, mobile sources, water, solid waste, and other state regulations and goals. The following text describes EOs, Assembly Bills (ABs), Senate Bills (SBs), and other regulations and plans that would directly or indirectly reduce GHG emissions.

State Climate Change Targets

Executive Order S-3-05. EO S-3-05 (June 2005) established the following statewide goals: GHG emissions should be reduced to 2000 levels by 2010, reduced to 1990 levels by 2020, and reduced to 80% below 1990 levels by 2050. EO S-3-05 also directed the California EPA to report biannually on progress made toward meeting the GHG targets and the impacts to California due to climate change, including impacts to water supply, public health, agriculture, the coastline, and forestry.

Assembly Bill 32. In furtherance of the goals established in EO S-3-05, the legislature enacted AB 32 (Núñez and Pavley), the California Global Warming Solutions Act of 2006 (September 27, 2006). AB 32 requires California to reduce its GHG emissions to 1990 levels by 2020, representing a reduction of approximately 15% below emissions expected under a business-as-usual scenario, and initiate the transformations required to achieve the state's long-range climate objectives.

Executive Order B-18-12. EO B-18-12 (April 2012) directs state agencies, departments, and other entities under the governor's executive authority to take action to reduce entity-wide GHG emissions by at least 10% by 2015 and 20% by 2020, as measured against a 2010 baseline. EO B-18-12 also established goals for existing state buildings for reducing grid-based energy purchases and water use.

Executive Order B-30-15. EO B-30-15 (April 2015) identified an interim GHG reduction target in support of targets previously identified under EO S-3-05 and AB 32. EO B-30-15 set an interim target goal of reducing GHG emissions to 40% below 1990 levels by 2030 to keep California on its trajectory toward meeting or exceeding the long-term goal of reducing GHG emissions to 80% below 1990 levels by 2050 as set forth in EO S-3-05. To facilitate achievement of this goal, EO B-30-15 calls for an update to the California Air Resources Board (CARB) Scoping Plan to express the 2030 target in terms of MMT CO_2e. The EO also calls for state agencies to continue to develop and implement GHG emission reduction programs in support of the reduction targets. Sector-specific agencies in transportation, energy, water, and forestry were required to prepare GHG reduction plans by September 2015, followed by a report on action taken in relation to these plans in June 2016. EO B-30-15 does not require local agencies to take any action to meet the new interim GHG reduction threshold.

Senate Bill 32 and Assembly Bill 197. SB 32 and AB 197 (enacted in 2016) are companion bills that set new statewide GHG reduction targets, make changes to CARB's membership, increase legislative oversight of CARB's climate change–based activities, and expand dissemination of GHG and other air quality–related emissions data to enhance transparency and accountability. SB 32 codified the 2030 emissions reduction goal of EO B-30-15 by requiring CARB to ensure that statewide GHG emissions are reduced to 40% below 1990 levels by 2030. AB 197 established the Joint Legislative Committee on Climate Change Policies, consisting of at least three members of the Senate and three members of the Assembly, to provide ongoing oversight over implementation of the state's climate policies. AB 197 also added two members of the legislature to CARB as nonvoting members; requires CARB to make available and update (at least annually via its website) emissions data for GHGs, criteria air pollutants, and toxic air contaminants (TACs) from reporting facilities; and, requires CARB to identify specific information for GHG emissions reduction measures when updating the scoping plan.

Short-Lived Climate Pollutant Reduction Strategy — Senate Bills 605 and 1383. SB 605 (September 2014) requires CARB to complete a comprehensive strategy to reduce emissions of short-lived climate pollutants in the state no later than January 1, 2018. The Short-Lived Climate Pollutants Reduction Strategy was approved by CARB in March 2017 and lays out a range of options

to reduce short-lived climate pollutant emissions in California, including regulations, incentives, and other market-supporting activities. SB 1383 also establishes specific targets for the reduction of short-lived climate pollutants (40% below 2013 levels by 2030 for CH_4 and HFCs and 50% below 2013 levels by 2030 for anthropogenic black carbon) and provides direction for reductions from dairy and livestock operations and landfills.

Assembly Bill 1279. The legislature enacted AB 1279, the California Climate Crisis Act, in September 2022. The bill declares the policy of the state to achieve net zero GHG emissions as soon as possible, but no later than 2045, and achieve and maintain net negative GHG emissions thereafter. Although AB 1279 establishes an overall policy to achieve net zero GHG emissions as soon as possible, but no later than 2045, recognizing the need to implement CO_2 removal and carbon capture, utilization, and storage technologies, the legislature established a specific target of 85% below 1990 levels by 2045 for anthropogenic GHG emissions. Therefore, the net zero target does not directly apply to development projects, but the 2045 target of 85% below 1990 levels represents the reductions required to contribute to accomplishing the state's overall net zero policy.

California Air Resources Board's Climate Change Scoping Plan. One specific requirement of AB 32 is for CARB to prepare a "scoping plan" for achieving the maximum technologically feasible and cost-effective GHG emission reductions by 2020 (California Health and Safety Code Section 38561[a]) and to update the plan at least once every 5 years. In 2008, CARB approved the first scoping plan: The *Climate Change Proposed Scoping Plan: A Framework for Change* (Scoping Plan). The Scoping Plan included a mix of recommended strategies that combined direct regulations, market-based approaches, voluntary measures, policies, and other emission-reduction programs calculated to meet the 2020 statewide GHG emission limit and initiate the transformations needed to achieve the state's long-range climate objectives.

In 2014, CARB approved the first update to the Scoping Plan. The *First Update to the Climate Change Scoping Plan: Building on the Framework* (First Update) defined the state's GHG emission reduction priorities for the next 5 years and laid the groundwork to start the transition to the post-2020 goals set forth in EOs S-3-05 and B-16-2012 (CARB 2014). The First Update concluded that California was on track to meet the 2020 target but recommended a 2030 mid-term GHG reduction target be established to ensure a continuum of action to reduce emissions. The First Update recommended a mix of technologies in key economic sectors to reduce emissions through 2050 including energy demand reduction through efficiency and activity changes; large-scale electrification of on-road vehicles, buildings, and industrial machinery; decarbonizing electricity and fuel supplies; and the rapid market penetration of efficient and clean energy technologies.

In December 2017, CARB released the *2017 Climate Change Scoping Plan Update* (Second Update) for public review and comment (CARB 2017). The Second Update built upon the successful framework established in the initial Scoping Plan and First Update, while identifying new technologically feasible

and cost-effective strategies that served as the framework to achieve the 2030 GHG target and define the state's climate change priorities to 2030 and beyond. The strategies' "known commitments" included implementing renewable energy and energy efficiency (including the mandates of SB 350), increased stringency of the Low Carbon Fuel Standard, measures identified in the Mobile Source and Freight Strategies, measures identified in the proposed Short-Lived Climate Pollutant Plan, and increased stringency of SB 375 targets. To fill the gap in additional reductions needed to achieve the 2030 target, the Second Update recommended continuing the Cap-and-Trade Program and a measure to reduce GHGs from refineries by 20%. The Second Update was approved by CARB's Governing Board on December 14, 2017.

CARB approved the *2022 Scoping Plan for Achieving Carbon Neutrality* in December 2022, which outlines the state's plan to reduce anthropogenic emissions to 85% below 1990 levels by 2045, and achieve carbon neutrality by 2045 or earlier in accordance with AB 1279. The plan also assesses the progress the state is making toward reducing GHG emissions by at least 40% below 1990 levels by 2030, as is required by SB 32 and laid out in the Second Update, but indicates that additional reductions are needed by 2030 (i.e., 48% below 1990 levels) for the state to remain on track to achieve net zero GHG emissions by 2045. The carbon neutrality goal requires CARB to expand proposed actions from only the reduction of anthropogenic sources of GHG emissions to also include those that capture and store carbon (e.g., through natural and working lands, or mechanical technologies). The carbon reduction programs build on and accelerate those currently in place, including moving to zero-emission transportation; phasing out use of fossil gas use for heating homes and buildings; reducing chemical and refrigerants with high GWP; providing communities with sustainable options for walking, biking, and public transit; displacing fossil-fuel fired electrical generation through use of renewable energy alternatives (e.g., solar arrays and wind turbines); and scaling up new options such as green hydrogen.[2] The *2022 Scoping Plan for Achieving Carbon Neutrality* also introduces stringent per capita VMT reductions of 25% below 2019 levels by 2030 and 30% below 2019 levels by 2045 (CARB 2022).

The *2022 Scoping Plan for Achieving Carbon Neutrality* also emphasizes that there is no realistic path to carbon neutrality without carbon removal and sequestration, and to achieve the state's carbon neutrality goal, carbon reduction programs must be supplemented by strategies to remove and sequester carbon, which can include use of nature-based solutions to encourage carbon capture and storage. However, the 2022 Scoping Plan emphasizes that reliance on carbon sequestration in the state's natural and working lands will not be sufficient to address residual GHG emissions, and

[2] Green hydrogen refers to hydrogen that is generated by renewable energy or from low-carbon power and has significantly lower associated carbon emissions than gray hydrogen, which is produced using natural gas and makes up the majority of hydrogen production. For the purposes of the *Draft 2022 Scoping Plan*, the term "green hydrogen" is not limited to only electrolytic hydrogen produced from renewables.

achieving carbon neutrality will require research, development, and deployment of additional methods to capture atmospheric GHG emissions (e.g., mechanical direct air capture).

The Scoping Plan recommends strategies for implementation at the statewide level to meet the goals of AB 32, SB 32, AB 1279, and the EOs; it also establishes an overall framework for the measures that will be adopted to reduce California's GHG emissions. A project is considered consistent with the statutes and EOs if it would meet the general policies in reducing GHG emissions in order to facilitate the achievement of the state's goals and would not impede attainment of those goals.

Building Energy

Title 24, Part 6. The California Building Standards Code was established in 1978 and serves to enhance and regulate California's building standards. While not initially promulgated to reduce GHG emissions, Part 6 of Title 24 specifically established Building Energy Efficiency Standards that are designed to ensure that new and existing buildings in California achieve energy efficiency and preserve outdoor and indoor environmental quality. These energy efficiency standards are reviewed every few years by the Building Standards Commission and the California Energy Commission (CEC), and revised if necessary (PRC Section 25402[b][1]). The regulations receive input from members of industry, as well as the public, in order to "reduce the wasteful, uneconomic, inefficient, or unnecessary consumption of energy" (PRC Section 25402). These regulations are carefully scrutinized and analyzed for technological and economic feasibility (PRC Section 25402[d]) and cost effectiveness (PRC Section 25402[b][2–3]). As a result, these standards save energy, increase electricity supply reliability, increase indoor comfort, avoid the need to construct new power plants, and help preserve the environment. The current Title 24 standards are the 2022 Title 24 building energy efficiency standards, which became effective January 1, 2023.

The 2022 standards improve upon the 2019 standards for new construction of, and additions and alterations to, residential and nonresidential buildings. The CEC updates the Title 24 Energy Code every 3 years. The CEC adopted the 2022 Title 24 Energy Code in August 2021, and the California Building Standards Commission approved incorporating the updated code into the California Green Building Standards (CALGreen) in December 2021.

Title 24, Part 11. In addition to the CEC's efforts, in 2008, the California Building Standards Commission adopted the nation's first green building standards. The California Green Building Standards Code (Part 11 of Title 24) is commonly referred to as CALGreen and establishes minimum mandatory standards as well as voluntary standards pertaining to the planning and design of sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and interior air quality. CALGreen took effect in January 2011 and instituted mandatory minimum environmental performance standards

for all ground-up, new construction of commercial, low-rise residential and state-owned buildings and schools and hospitals. The CALGreen 2022 standards, which are the current standards, became effective January 1, 2023.

Title 20. Title 20 of the California Code of Regulations requires manufacturers of appliances to meet state and federal standards for energy and water efficiency. Performance of appliances must be certified through the CEC to demonstrate compliance with standards.

Renewable Energy and Energy Procurement

Senate Bill 1078. SB 1078 (2002) established the Renewables Portfolio Standard program, which requires an annual increase in renewable generation by the utilities.

Senate Bill 1368. SB 1368 (2006) requires the CEC to develop and adopt regulations for GHG emission performance standards for the long-term procurement of electricity by local publicly owned utilities. These standards must be consistent with the standards adopted by the California Public Utilities Commission (CPUC).

Senate Bill X1 2. SB X1 2 (April 2011) expanded the Renewables Portfolio Standard by establishing a goal of 20% of the total electricity sold to retail customers in California per year be renewable by December 31, 2013, and 33% by December 31, 2020, and in subsequent years. Under the bill, a renewable electrical generation facility is one that uses biomass, solar thermal, photovoltaic, wind, geothermal, fuel cells using renewable fuels, small hydroelectric generation of 30 megawatts or less, digester gas, municipal solid waste conversion, landfill gas, ocean wave, ocean thermal, or tidal current, and that meets other specified requirements with respect to its location.

Senate Bill 350. SB 350 (October 2015) expands the Renewables Portfolio Standard by establishing a goal of 50% of the total electricity sold to retail customers in California per year be renewable by December 31, 2030. In addition, SB 350 includes the goal to double the energy efficiency savings in electricity and natural gas final end uses (such as heating, cooling, lighting, or class of energy uses on which an energy-efficiency program is focused) of retail customers through energy conservation and efficiency. The bill also requires the CPUC, in consultation with the CEC, establish efficiency targets for electrical and gas corporations consistent with this goal.

Senate Bill 100. SB 100 (2018) increased the standards set forth in SB 350, establishing that 44% of the total electricity sold to retail customers in California per year by December 31, 2024, 52% by December 31, 2027, and 60% by December 31, 2030, be secured from qualifying renewable energy sources. SB 100 states that it is the policy of the state that eligible renewable energy resources and zero-carbon resources supply 100% of the retail sales of electricity to California. This bill requires that the achievement of 100% zero-carbon electricity resources do not increase the carbon

emissions elsewhere in the western grid and that the achievement not be achieved through resource shuffling.

Senate Bill 1020. SB 1020 (September 2022) revises the standards from SB 100, requiring the following percentage of retail sales of electricity to California end-use customers come from eligible renewable energy resources and zero-carbon resources: 90% by December 31, 2035; 95% by December 31, 2040; and 100% by December 31, 2045.

Mobile Sources

State Vehicle Standards (Assembly Bill 1493 and Executive Order B-16-12). AB 1493 (July 2002) was enacted in response to the transportation sector accounting for more than half of California's CO_2 emissions. AB 1493 required CARB to set GHG emission standards for passenger vehicles, light-duty trucks, and other vehicles determined by CARB to be vehicles primarily used for noncommercial personal transportation in the state. AB 1493 required that CARB set GHG emission standards for motor vehicles manufactured in 2009 and all subsequent model years. CARB adopted the standards in September 2004. EO B-16-12 (March 2012) required that state entities under the governor's direction and control support and facilitate the rapid commercialization of ZEVs. It ordered CARB, CEC, the CPUC, and other relevant agencies to work with the Plug-In Electric Vehicle Collaborative and the California Fuel Cell Partnership to establish benchmarks to help achieve goals by 2015, 2020, and 2025. On a statewide basis, EO B-16-12 established a target reduction of GHG emissions from the transportation sector equaling 80% less than 1990 levels by 2050.

In March 2022, EPA reinstated California's authority under the CAA to implement its own GHG emission standards and ZEV sales mandate. EPA's action concludes its reconsideration of the 2019 SAFE-1 rule by finding that the actions taken under the previous administration as a part of SAFE-1 were decided in error and are now entirely rescinded.

Executive Order S-1-07. Issued on January 18, 2007, EO S-1-07 sets a declining Low Carbon Fuel Standard for GHG emissions measured in CO_2e grams per unit of fuel energy sold in California. The target of the Low Carbon Fuel Standard is to reduce the carbon intensity of California passenger vehicle fuels by at least 10% by 2020. The Low Carbon Fuel Standard was subsequently amended in 2018 to require a 20% reduction in carbon intensity by 2030. The carbon intensity measures the amount of GHG emissions in the life cycle of a fuel, including extraction/feedstock production, processing, transportation, and final consumption, per unit of energy delivered.

Senate Bill 375. SB 375 (Steinberg) (September 2008) addresses GHG emissions associated with the transportation sector through regional transportation and sustainability plans and was enacted into law. SB 375 required CARB to adopt regional GHG reduction targets for the automobile and light-truck sector for 2020 and 2035. Regional metropolitan planning organizations are then responsible for preparing a Sustainable Communities Strategy (SCS) within their Regional Transportation Plan

(RTP). The goal of the SCS is to establish a forecasted development pattern for the region that, after considering transportation measures and policies, will achieve, if feasible, the GHG reduction targets. If an SCS is unable to achieve the GHG reduction target, a metropolitan planning organization must prepare an Alternative Planning Strategy demonstrating how the GHG reduction target would be achieved through alternative development patterns, infrastructure, or additional transportation measures or policies.

Pursuant to Government Code Section 65080(b)(2)(K), a sustainable communities strategy does not (1) regulate the use of land; (2) supersede the land use authority of cities and counties; or (3) require that a city's or county's land use policies and regulations, including those in a general plan, be consistent with it. Nonetheless, SB 375 makes regional and local planning agencies responsible for developing those strategies as part of the federally required metropolitan transportation planning process and the state-mandated housing element process.

The San Diego Association of Governments serves as the metropolitan planning organization for the San Diego region and is responsible for developing and adopting an SCS that integrates transportation, land use, and housing to meet GHG reduction targets set by CARB. The RTP/SCS is updated every 4 years in collaboration with the 18 cities and unincorporated County of San Diego, in addition to regional, state, and federal partners. The most recent, *San Diego Forward: The 2021 Regional Plan*, was adopted in 2021 and provides guidance on meeting or exceed GHG targets through implementation of five key transportation strategies, including complete corridors, high-speed transit services, mobility hubs, flexible fleets, and a digital platform to tie the transportation system together. Through these strategies, the *2021 Regional Plan* is projected to reduce per capita GHG emissions from cars and light-duty trucks to 20% below 2005 levels by 2035, exceeding the regions state-mandated target of 19% (SANDAG 2021).

Advanced Clean Cars Program and Zero-Emissions Vehicle Program. The Advanced Clean Cars program (January 2012) is a new emissions-control program for model years 2015 through 2025. The program combines the control of smog- and soot-causing pollutants and GHG emissions into a single coordinated package. The package includes elements to reduce smog-forming pollution, reduce GHG emissions, promote clean cars, and provide the fuels for clean cars (CARB 2012). To improve air quality, CARB has implemented new emission standards to reduce smog-forming emissions beginning with 2015 model year vehicles. It is estimated that in 2025 cars will emit 75% less smog-forming pollution than the average new car sold today. To reduce GHG emissions, CARB, in conjunction with the EPA and the NHTSA, adopted new GHG standards for model year 2017 to 2025 vehicles; the new standards are estimated to reduce GHG emissions by 34% in 2025. The Zero-Emissions Vehicle Program will act as the focused technology of the Advanced Clean Cars program by requiring manufacturers to produce increasing numbers of ZEVs and plug-in hybrid EVs in the 2018 to 2025 model years. The Advanced Clean Cars II program establishes the next set of low-emissions vehicle and ZEV requirements for model years after 2025, to contribute to meeting

federal ambient air quality O_3 standards and California's carbon neutrality standards. The Advanced Clean Cars II rulemaking package also considers technological feasibility, equity, and environmental, economic, and consumer impacts.

Advanced Clean Trucks Regulation. The purpose of the Advanced Clean Trucks Regulation (June 2020) is to accelerate the market for ZEVs in the medium- and heavy-duty truck sector and to reduce emissions of oxides of nitrogen, fine particulate matter, TACs, GHGs, and other criteria pollutants generated from on-road mobile sources. Requiring medium- and heavy-duty vehicles to transition to zero-emission technology will reduce health risks to people living in and visiting California and is needed to help California meet established near- and long-term air quality and climate mitigation targets.

Executive Order B-16-12. EO B-16-12 (March 2012) requires that state entities under the governor's direction and control support and facilitate the rapid commercialization of ZEVs. On a statewide basis, EO B-16-12 establishes a target reduction of GHG emissions from the transportation sector equaling 80% less than 1990 levels by 2050.

Water

Executive Order B-29-15. In response to the ongoing drought in California, EO B-29-15 (April 2015) set a goal of achieving a statewide reduction in potable urban water usage of 25% relative to water use in 2013. The term of the EO extended through February 28, 2016, although many of the directives have become permanent water-efficiency standards and requirements. In response to EO B-29-15, the California Department of Water Resources has modified and adopted a revised version of the Model Water Efficient Landscape Ordinance that, among other changes, significantly increases the requirements for landscape water use efficiency and broadens its applicability to include new development projects with smaller landscape areas.

Solid Waste

Assembly Bills 939, 341, and 1826 and Senate Bill 1383. In 1989, AB 939, known as the Integrated Waste Management Act (PRC Section 40000 et seq.), was passed because of the increase in waste stream and decrease in landfill capacity. The statute established the California Integrated Waste Management Board, which oversees a disposal reporting system. AB 939 mandated a reduction in waste disposal in which jurisdictions were required to meet diversion goals of all solid waste through source reduction, recycling, and composting activities of 25% by 1995 and 50% by 2000.

AB 341 (Chapter 476, Statutes of 2011 [Chesbro]) amended the California Integrated Waste Management Act of 1989 to include a provision declaring that it is the policy goal of the state that not less than 75% of solid waste generated be source-reduced, recycled, or composted by 2020 and annually thereafter. The

California Department of Resources Recycling and Recovery (CalRecycle) identified five priority strategies that would assist the state in reaching the 75% goal by 2020, legislative and regulatory recommendations, and an evaluation of program effectiveness (CalRecycle 2015).

AB 1826 (Chapter 727, Statutes of 2014, effective 2016) required businesses to recycle their organic waste (i.e., food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste mixed in with food waste) depending on the amount of waste they generate per week. This law also requires local jurisdictions across the state to implement an organic waste recycling program to divert organic waste generated by businesses, including multifamily residential dwellings that consist of five or more units.

SB 1383 (Chapter 395, Statutes of 2016) establishes targets to achieve a 50% reduction in the level of the statewide disposal of organic waste from the 2014 level by 2020 and a 75% reduction by 2025. SB 1383 granted CalRecycle the regulatory authority required to achieve the organic waste disposal reduction targets and established an additional target that not less than 20% of currently disposed edible food is recovered for human consumption by 2025 (CalRecycle 2019).

Other State Regulations and Goals

Senate Bill 97. SB 97 (Dutton) (August 2007) directs the Governor's Office of Planning and Research (now called the Governor's Office of Land Use and Climate Innovation) to develop guidelines under CEQA for the mitigation of GHG emissions. In 2008, the Governor's Office of Planning and Research issued a technical advisory as interim guidance regarding the analysis of GHG emissions in CEQA documents, which indicated that a project's GHG emissions, including those associated with vehicular traffic, energy consumption, water usage, and construction activities, should be identified and estimated (OPR 2008). The advisory further recommended that the Lead Agency determine significance of the impacts and impose all mitigation measures necessary to reduce GHG emissions to a level that is less than significant. The CNRA adopted the CEQA Guidelines amendments in December 2009, which became effective in March 2010.

Under the amended CEQA Guidelines, a Lead Agency has the discretion to determine whether to use a quantitative or qualitative analysis or apply performance standards to determine the significance of GHG emissions resulting from a particular project (14 CCR 15064.4[a]). The CEQA Guidelines require that a Lead Agency consider the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions (14 CCR 15064.4[b]). The CEQA Guidelines also allow lead agencies to consider feasible means of mitigating the significant effects of GHG emissions, including reductions in emissions through the implementation of project features or off-site measures. The adopted amendments do not establish a GHG emission threshold, instead allowing a Lead Agency to develop, adopt, and apply its own thresholds of significance or those developed by other agencies or

experts. The CNRA also acknowledges that a Lead Agency may consider compliance with regulations or requirements implementing AB 32 in determining the significance of a project's GHG emissions (CNRA 2009).

Local

San Diego County Air Pollution Control District

In San Diego County, the San Diego County Air Pollution Control District (SDAPCD) is the agency responsible for protecting public health and welfare through the administration of federal and state air quality laws and policies. The SDAPCD currently has no regulations relative to GHG emissions. However, some rules and regulations that address criteria air pollutants may also have a co-benefit for GHG emissions.

City of San Diego General Plan

The State of California requires cities and counties to prepare and adopt a general plan to set out a long-range vision and comprehensive policy framework for its future. The state also mandates that the plan be updated periodically to ensure relevance and utility. The *City of San Diego General Plan* was unanimously adopted by the City Council on March 10, 2008, with additional amendments approved as recently as 2024. The General Plan builds upon many of the goals and strategies of the former 1979 General Plan, in addition to offering new policy direction in the areas of urban form, neighborhood character, historic preservation, public facilities, recreation, conservation, mobility, housing affordability, economic prosperity, and equitable development. It recognizes and explains the critical role of the community planning process as the vehicle to tailor the City of Villages strategy for each neighborhood. It also outlines the plan amendment process and other implementation strategies and considers the continued growth of the City beyond the year 2020 (City of San Diego 2024).

Conservation Element. The Conservation Element contains policies to guide the conservation of resources that are fundamental components of San Diego's environment, that help define the City's identity, and that are relied upon for continued economic prosperity. The purpose of this element is to help the City become an international model of sustainable development and conservation and to provide for the long-term conservation and sustainable management of the rich natural resources that help define the City's identity, contribute to its economy, and improve its quality of life.

The City has also adopted the following General Plan Conservation Element policies related to climate change (City of San Diego 2024):

- ***CE-A.2.*** Reduce the City's carbon footprint. Develop and adopt new or amended regulations, programs, and incentives as appropriate to implement the goals and policies set forth in the General Plan to:
    - Create sustainable and efficient land use patterns to reduce vehicular trips and preserve open space;
    - Reduce fuel emission levels by encouraging alternative modes of transportation and increasing fuel efficiency;
    - Improve energy efficiency, especially in the transportation sector and buildings and appliances;
    - Reduce the Urban Heat Island effect through sustainable design and building practices and climate adaptation strategies;
    - Reduce waste by improving management and recycling programs;
    - Plan for water supply and emergency reserves.
- ***CE-A.8.*** Reduce construction and demolition waste in accordance with Public Facilities Element, Policy PF-I.2, or by renovating or adding on to existing buildings, rather than constructing new buildings.
- ***CE-A.9.*** Reuse building materials, use materials that have recycled content, or use materials that are derived from sustainable or rapidly renewable sources to the extent possible, through factors including:
    - Scheduling time for deconstruction and recycling activities to take place during project demolition and construction phases;
    - Using life cycle costing in decision-making for materials and construction techniques. Life cycle costing analyzes the costs and benefits over the life of a particular product, technology, or system.
- ***CE-F.3.*** Continue to use methane as an energy source from inactive and closed landfills.
- ***CE-I.4.*** Maintain and promote water conservation and waste diversion programs to conserve energy.
- ***CE-I.5.*** Support the installation of photovoltaic panels, and other forms of renewable energy production.
    - Seek funding to incorporate renewable energy alternatives in public buildings.
    - Promote the use and installation of renewable energy alternatives in new and existing development.

- ***CE-I.10.*** Use renewable energy sources to generate energy to the extent feasible.

City of San Diego Climate Action Plan

The City Council adopted the *Climate Action Plan* (CAP) in August 2022. The City's CAP establishes a community-wide goal of net zero GHG emissions by 2035 and identifies the following six key strategies to achieve goals and targets of the plan (City of San Diego 2022a):

1. Decarbonization of the built environment
2. Access to clean and renewable energy
3. Mobility and land use
4. Circular economy and clean communities
5. Resilient infrastructure and healthy ecosystems
6. Emerging climate actions

In addition to the CAP, the City provided a memorandum with guidance on addressing CEQA analysis of GHG emissions for public infrastructure projects (City of San Diego 2022b). Per the memorandum, environmental analysis for public infrastructure projects should include a discussion of overall consistency with each of the strategies of the City's CAP (listed above), specifically identifying project features that would meet goals of the plan.

4.3.4 THRESHOLDS OF SIGNIFICANCE

Thresholds used to evaluate potential impacts related to GHGs are based on applicable criteria in the City's *California Environmental Quality Act (CEQA) Significance Determination Thresholds* (City of San Diego 2022c). For the purposes of this analysis, the Project would have a significant environmental impact if it would:

Issue 1: Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment

Issue 2: Conflict with the City's Climate Action Plan or another applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases

4.3.5 APPROACH AND METHODOLOGY

The City's 2016 update to the *CEQA Significance Determination Thresholds* document added a GHG emissions threshold section, which is maintained in the most recent update from September 2022. Pursuant to CEQA Guidelines Sections 15183.5(b), 15064(h)(3), and 15130(d), the City may determine that a project's incremental contribution to a cumulative GHG effect is not cumulatively considerable

if the project complies with the requirements of a previously adopted GHG emission reduction plan. CEQA Guidelines Section 15183.5(b)(1)(A-F) specifically provides that a GHG emissions reduction plan should:

A. Quantify greenhouse gas emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic area;

B. Establish a level, based on substantial evidence, below which the contribution to greenhouse gas emissions from activities covered by the plan would not be cumulatively considerable;

C. Identify and analyze the greenhouse gas emissions resulting from specific actions or categories of actions anticipated within the geographic area;

D. Specify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level;

E. Establish a mechanism to monitor the plan's progress toward achieving the level and to require amendment if the plan is not achieving specified levels;

F. Be adopted in a public process following environmental review.

An environmental document that relies on a GHG emissions reduction plan for a cumulative impacts analysis must identify those requirements specified in the plan that apply to that project, and if those requirements are not otherwise binding and enforceable, incorporate those requirements as mitigation measures applicable to the project (14 CCR 15183.5[b][2]).

As part of the 2022 CAP update, the CAP Consistency Checklist was repealed and replaced by the Ordinance (O-21528). This ordinance provides amendments to the SDMC (adds CAP Consistency Regulations) to ensure that all new development is consistent with the updated CAP (CAP Consistency Regulations) and will collectively achieve the specified GHG emission reduction targets of the CAP update. The CAP quantifies GHG emissions, establishes a threshold for cumulatively considerable emissions, and specifies strategies for emission reductions along with a mechanism to monitor progress. As such, the CAP update serves as a qualified GHG reduction plan for purposes of tiering under CEQA as set forth in CEQA Guidelines Section 15183.5.

For plan- and policy-level environmental documents, as well as environmental documents for public infrastructure projects, the City Planning Department prepared a memorandum, *Climate Action Plan Consistency for Plan- and Policy-Level Documents and Public Infrastructure Projects*, dated June 17, 2022, and revised after Blueprint SD was adopted, to provide guidance on significance determination as it relates to consistency with the strategies in the CAP. The City's guidance document requires environmental documents to address the ways in which the plan or policy is consistent with the goals and policies of the General Plan and CAP, specifically General Plan Policies LU-A.9, ME-D.17,

CE-J.2, and CE-J.3 and Strategy 3 from the CAP, although all six strategies from the CAP should be discussed. Additionally, the analysis should discuss the applicability of the City's CAP Consistency Regulations.

4.3.6 IMPACTS

Issue 1: Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Impact Threshold

According to the City's *Significance Determination Thresholds*, project-level significance is determined through (a) land use consistency and (b) project compliance with the regulations set forth in SDMC Chapter 14, Article 3, Division 14, CAP Consistency Regulations.

Analysis

As specified in Section 4.3.5, Approach and Methodology, the method for determining significance as it relates to the Project's consistency with the CAP is accomplished through evaluation of the Project's consistency with General Plan Policies LU-A.9, ME-D.17, CE-J.2, and CE-J.3 and consistency with the CAP's strategies, specifically Strategy 3. Consistency with these policies and CAP strategies is detailed under Issue 2, below. Quantification of GHG emissions is not required for the project based on the City's *CEQA Significance Determination Thresholds* (City of San Diego 2022c, amended 2025). This is pursuant to the City Planning Department's June 17, 2022, memorandum, *Climate Action Plan Consistency for Plan- and Policy-Level Environmental Documents and Infrastructure Projects*. Environmental analysis for plan- and policy-level documents should address the ways in which the plan or policy is consistent with the goals and policies of the General Plan and CAP. As detailed in Issue 2, implementation of the Project would be consistent with applicable plans, policies, and regulations adopted for the purpose of reducing GHG emissions. Therefore, impacts related to GHG emissions would be **less than significant**.

Issue 2: Would the Project conflict with the City's Climate Action Plan or another applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Impact Threshold

A project could result in a significant impact on GHG emissions if it would:

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

Analysis

The City's 2022 CAP includes CAP Consistency Regulations for general land use project-level analyses. For public infrastructure projects, the City prepared a memo (*Climate Action Plan Consistency for Plan- and Policy-Level Environmental Documents and Public Infrastructure Projects*), which outlines an alternative approach to evaluating project consistency with the CAP that is more appropriate for infrastructure projects (City of San Diego 2022b). Per the City's recommended approach, environmental analysis for public infrastructure projects should include a discussion of overall consistency with each of the City's CAP key strategies, specifically identifying project features that would meet the goals of the plan. The six key strategies of the CAP are provided below, with a discussion of the proposed Project's consistency.

Strategy 1: Decarbonization of the Built Environment

Strategy 1 of the City's CAP recognizes the large emission reduction potential from reducing the use of energy generated from fossil fuels and the use of natural gas in buildings. The City's CAP has adopted a goal to achieve zero emissions municipal buildings and operations by 2035. Actions to achieve this goal include use of LED streetlights and auto-dimming technology where public safety would not be compromised. Consistent with this strategy, streetlights installed as a result of the Project would use LED lights and incorporate auto-dimming, where appropriate in accordance with the City's streetlighting standards. The Project does not involve construction or operation of new or existing buildings and would not conflict with the City's additional strategies to reduce emissions from building energy.

Strategy 2: Access to Clean and Renewable Energy

Strategy 2 of the City's CAP includes a goal of 100% renewable or GHG-free power for the City by 2030. To achieve this goal, the City plans to partner with San Diego Community Power to increase adoption of 100% renewable energy supply and to incentivize local generation of renewable energy resources, increase municipal ZEVs, and expand EV charging to encourage citywide adoption of EVs and bicycles. Implementation of the Project would change the location of electric distribution and telecommunication lines from overhead service to underground service. The Project does not propose any development that would typically support installation of EV charging infrastructure or necessitate renewable energy technologies (e.g., battery storage, solar, microgrids). The Project would not include any measures that would change the source of energy supplied or increase operational energy demand and would not conflict with the City's ability to implement and achieve their renewable energy goals.

Strategy 3: Mobility and Land Use

The City's CAP Strategy 3 addresses mobile source emissions and land use patterns throughout the City. The strategy promotes bike and pedestrian projects to encourage alternative modes of transit and actions to reduce traffic and congestion across the City. Implementation of the Project would result in temporary impacts to streets that are trenched or repaved, including removal of poles from the right-of-way and addition of aboveground transformer boxes and pedestals. However, traffic control plans required for construction permits would ensure that mass transit, bicycles, and pedestrians are safely re-routed. The Project would return existing streets to their previous configuration, including restriping of existing bike lanes, and inclusion of pedestrian curb ramps, where necessary. As such, the Project would not conflict with the achievement of Strategy 3 goals.

Strategy 4: Circular Economy and Clean Communities

Strategy 4 of the City's CAP addresses waste and clean communities. To achieve their waste-related goals, the City proposes actions to change the waste stream; reduce municipal waste; encourage food waste prevention and food recovery; update, adopt, and implement the *Zero Waste Plan*; and capture CH_4 from wastewater treatment facilities. Much of the solid waste generated during construction consists of inert material such as dirt, concrete, and rock, which would not generate CH_4 emissions and would be recycled to the extent feasible. Treated wooden utility poles are considered hazardous waste, which cannot be recycled, and would be disposed in accordance with local, state, and federal laws. Additionally, the Project would reduce the amount of tree trimming required by aboveground lines, allowing for a larger and healthier urban tree canopy in the locations where overhead lines are removed, which would reduce the amount of green waste produced from this activity.

The Project would not generate waste or wastewater during operation, and there would be no long-term increase in solid waste production associated with the Project. As such, implementation of the Project would not impede the achievement of Strategy 4.

Strategy 5: Resilient Infrastructure and Healthy Ecosystems

The City's CAP also includes actions related to the natural and built environments to reflect the City's resiliency work to prepare for the impacts of climate change and minimize its negative effects. Per the City's guidance memo for analyzing consistency with the CAP, public infrastructure projects shall describe project features that further the City's resiliency goals through project features that increase tree planting (e.g., replace street trees that are removed, add street trees to the public right-of-way, or offer street trees to adjacent property owners) or features that support climate resiliency, such as storm drain maintenance to prepare for greater prevalence of extreme rain events. The Project would support the City's Strategy 5 goals, given that utility undergrounding can improve utility reliability during severe weather, reducing the risk of wildfire and supporting climate resiliency.

Additionally, during construction, every effort would be made to avoid modification to or removal of existing street trees by requiring a consultation with the City's horticulturalist whenever a tree root greater than 2 inches in diameter must be pruned or removed. On rare occasions when a tree must be removed for purposes of worker and public safety, new street trees are offered at no cost to property owners with a feasible planting location. To reduce the impact associated with tree removal (if needed) and to enhance neighborhood trees, the Project would plant new street trees when the property owner signs an agreement to water and care for the tree until it becomes established. As such, the Project would not conflict with Strategy 5 and would support the City's goal to increase tree canopy coverage.

Strategy 6: Emerging Climate Actions

Strategy 6 of the City's CAP addresses emerging actions to reach emission reduction goals. Emerging actions include new policies, technological innovation, partnerships, and research that advances the City's net zero goal. While the proposed Project does not explicitly propose emerging climate action strategies, the strategic undergrounding of overhead utility lines in at-risk (i.e., fire-prone) communities would reduce the chance of overhead lines sparking fires during adverse weather events, which would reduce fire-related GHG emissions. As such, implementation of the Project will not conflict with the City's achievement of this strategy and may positively support emerging climate action goals.

As detailed above, where applicable, the Project would comply with and, in many cases, further the strategies and goals from the City's CAP. As such, the Project would not conflict with the CAP strategies applicable to the Project and would not impede the City's ability to implement the actions identified in the CAP to achieve the CAP's goals and targets and associated GHG emission reductions. Therefore, the impacts from Project implementation would be **less than significant**.

4.3.7 SIGNIFICANCE OF IMPACTS

In regard to Issue 1 and Issue 2, impacts would be **less than significant**.

4.3.8 MITIGATION, MONITORING, AND REPORTING

No mitigation is required.

4.3.9 SIGNIFICANCE AFTER MITIGATION

Because impacts related to GHGs would be less than significant and no mitigation is required, impacts would remain **less than significant**.

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4.4 Cultural, Historical, and Tribal Cultural Resources

4.4.1 INTRODUCTION

This section describes the existing cultural, historical, and tribal cultural resources setting of the City of San Diego's (City) Utilities Undergrounding Program (Project), identifies the applicable regulatory framework, evaluates potential impacts associated with cultural, historical, and tribal cultural resources that would result from the Project, identifies mitigation measures, if necessary, to reduce the level of impact associated with implementation of the Project, and identifies the level of significance after mitigation. For the purposes of this analysis, the term "undergrounding project" constitutes an overhead alignment to be undergrounded/constructed, and each undergrounding project consists of multiple individual "utilities" (i.e., specific pole and trench locations).

Information provided in this section is based on a review of existing documentation, including applicable environmental plans, the City of San Diego's General Plan, Municipal Code, Community Plans, and technical studies prepared for the Project including the Cultural Resources Inventory Report and Historical Resources Inventory Report included as Appendices D and E, respectively, to this Program Environmental Impact Report (PEIR).

4.4.2 REGULATORY SETTING

The Project is subject to federal, state, and local regulations regarding cultural, historical, and tribal cultural resources. The following section provides a summary of the applicable regulations, policies, and guidelines relating to the proper management of these resources for the Project.

Federal Regulations

National Historic Preservation Act of 1966 and National Register of Historic Places

The National Historic Preservation Act of 1966 established the National Register of Historic Places (NRHP) as the official federal list of cultural resources that have been nominated by state offices for their significance at the local, state, or federal level. Listing in the NRHP provides recognition that a property is historically significant to the nation, the state, or the community. Properties listed (or potentially eligible for listing) in the NRHP must meet certain significance criteria and possess integrity of form, location, or setting. Barring exceptional circumstances, resources generally must be at least 50 years old to be considered for listing in the NRHP.

Criteria for listing in the NRHP are stated in the Code of Federal Regulations (CFR) (36 CFR 60). A resource may qualify for listing if there is quality of significance in American history, architecture, archaeology, engineering, and culture present in districts, sites, buildings, structures, and objects

that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and where such resources:

- Are associated with events that have made a significant contribution to the broad patterns of history.
- Are associated with the lives of persons significant in the past.
- Embody the distinctive characteristics of a type, period, or method of construction; represent the work of a master; possess high artistic values; or represent a significant and distinguishable entity whose components may lack individual distinction.
- Have yielded, or may be likely to yield, information important in prehistory or history.

Eligible properties must meet at least one of the NRHP criteria and exhibit integrity, measured by the degree to which the resource retains its historical properties and conveys its historical character, the degree to which the original historic fabric has been retained, and the reversibility of changes to the property. The fourth criterion is typically reserved for archaeological resources. These criteria have largely been incorporated into the CEQA Guidelines (Section 15064.5) as well.

Criteria Considerations

Ordinarily cemeteries, birthplaces, or graves of historical figures, properties owned by religious institutions or used for religious purposes, structures that have been moved from their original locations, reconstructed historic buildings, properties primarily commemorative in nature, and properties that have achieved significance within the past 50 years shall not be considered eligible for the National Register. However, such properties will qualify if they are integral parts of districts that do meet the criteria if they fall within the following categories:

(a) A religious property deriving primary significance from architectural or artistic distinction or historical importance; or
(b) A building or structure removed from its original location but which is significant primarily for architectural value, or which is the surviving structure most importantly associated with a historic person or event; or
(c) A birthplace or grave of a historical figure of outstanding importance if there is no appropriate site or building directly associated with his productive life; or
(d) A cemetery which derives its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events; or
(e) A reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived; or

(f) A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own exceptional significance; or
(g) A property achieving significance within the past 50 years if it is of exceptional importance.

National Environmental Policy Act

The National Environmental Policy Act (NEPA) was signed into law on January 1, 1970. NEPA created an environmental review process requiring federal agencies to consider the effects of their actions on the environment. Under NEPA, all federal agencies must carry out their regulations, policies, and programs in accordance with NEPA's policies for environmental protection, including project compliance with Section 106 of the National Historic Preservation Act, as previously discussed. Any potential future development that requires a federal approval would be subject to NEPA requirements.

The Secretary of the Interior Standards and Guidelines for Archaeology and Historic Preservation

The Secretary of the Interior Standards and Guidelines for Archaeology and Historic Preservation are not regulatory and do not set or interpret agency policy. They are intended to provide technical advice about archaeological and historic preservation activities and methods. Federal agency personnel responsible for cultural resource management pursuant to Section 110 of the National Historic Preservation Act, State Historic Preservation Offices responsible under the National Historic Preservation Act, local governments wishing to establish a comprehensive approach, and other individuals and organizations needing basic technical standards and guidelines for historic preservation activities are encouraged to use these standards.

Native American Graves Protection and Repatriation Act

The Native American Graves Protection and Repatriation Act (NAGPRA) was passed in 1990 to provide for the protection of Native American graves. The act conveys to Native Americans of demonstrated lineal descent the human remains, including the funerary or religious items, that are held by federal agencies and federally supported museums, or that have been recovered from federal lands. NAGPRA makes the sale or purchase of Native American remains illegal, whether or not they were derived from federal or Native American lands.

State Regulations

California Register of Historical Resources

The California Office of Historic Preservation maintains the California Register of Historical Resources (CRHR). The CRHR is the authoritative guide to the state's significant historic and archeological resources. The program provides for the identification, evaluation, registration, and protection of California's historical resources. The CRHR encourages public recognition and

protection of resources of architectural, historic, archaeological, and cultural significance; identifies historical resources for State and local planning purposes; determines eligibility for State historic preservation grant funding; and affords certain protection to these resources under CEQA.

The CRHR has also established context types to be used when evaluating the eligibility of a property or resource for listing. The four criteria are as follows:

1. It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States.
2. It is associated with the lives of persons important to local, California, or national history.
3. It embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values.
4. It has yielded, or is likely to yield, information important to prehistory or history of the local area, California, or the nation.

Similar to the NRHP, eligibility for the CRHR requires an establishment of physical integrity, including the four criteria previously described. California's list of special considerations is less stringent than the NRHP, providing allowances for relocated buildings, structures, or objects as reduced requirements for physical integrity. CEQA Guidelines Section 15064.5 and Public Resources Code (PRC) Section 21083.2(g) define the criteria for determining the significance of historical resources. The term "historical resources" refers to all prehistoric and historic resources, including archaeological sites, traditional cultural properties, and historic buildings, structures, sites, objects, landscapes, etc. Since resources that are not listed or determined eligible for the state or local registers may still be historically significant, their significance shall be determined if they are affected by a project. The significance of a historical resource under Criterion 4 rests on its ability to address important research questions. Most archaeological sites which qualify for the CRHR do so under Criterion 4 (i.e., research potential).

California Environmental Quality Act

For the purposes of CEQA, a significant historical resource is one that qualifies for the CRHR or is listed in a local historic register or deemed significant in an historical resources survey, as provided under Section 5024.1(g) of the PRC. A resource that is not listed in or is not determined to be eligible for listing in the CRHR, is not included in a local register or historic resources, or is not deemed significant in a historical resources survey may nonetheless be deemed significant by a CEQA lead agency.

As indicated above, the California criteria (CEQA Guidelines Section 15064.5) for the registration of significant architectural, archaeological, and historical resources in the CRHR are nearly identical to those for the NRHP. Furthermore, PRC Section 21083.2(g) defines the criteria for determining the

significance of archaeological resources. These criteria include definitions for a "unique" resource, based on its:

1. Containing information needed to answer important scientific research questions and that there is a demonstrable public interest in that information;
2. Having a special and particular quality such as being the oldest or best available example of its type; and/or
3. Being directly associated with a scientifically recognized important prehistoric or historic event or person.

California Public Resources Code

Sections 5097– 5097.6 of the PRC outline the requirements for cultural resource analysis prior to the commencement of any construction project on state lands. The state agency proposing the project may conduct the cultural resource analysis or they may contract with the State Department of Parks and Recreation. In addition, this section stipulates that the unauthorized disturbance or removal of archaeological, historical, or paleontological resources located on public lands is a misdemeanor. It prohibits the knowing destruction of objects of antiquity without a permit (expressed permission) on public lands and provides for criminal sanctions. This section was amended in 1987 to require consultation with the California Native American Heritage Commission (NAHC) whenever Native American graves are found. Violations for the taking or possessing of remains or artifacts are felonies.

PRC Section 5097.9-991, regarding Native American heritage, outlines protections for Native American religion from public agencies and private parties using or occupying public property. Also protected by this code are Native American sanctified cemeteries, places of worship, religious or ceremonial sites, or sacred shrines located on public property.

California Health and Safety Code

Section 7052 of the California Health and Safety Code (H&SC) makes the willful mutilation, disinterment, or removal of human remains a felony. H&SC Section 7050.5 requires that construction or excavation be stopped in the vicinity of discovered human remains until the coroner can determine whether the remains are those of a Native American. If determined to be Native American, the coroner must contact the NAHC.

H&SC Section 8010-8030 constitutes the California Native American Graves Protection and Repatriation Act of 2001 (CalNAGPRA). CalNAGPRA, like the federal act, ensures that Native American human remains and cultural items are treated with respect and dignity during all phases of the archaeological evaluation process in accordance with CEQA and any applicable local regulations. The H&SC provides a process and requirements for the identification and repatriation of collections of

human remains or cultural items to the appropriate tribes from any state agency or museum that receives state funding.

California Government Code Section 65040.2(g)

California Government Code Section 65040.2(g) provides guidelines for consulting with Native American tribes for the following: (1) the preservation of, or the mitigation of impacts to places, features, and objects described in PRC Sections 5097.9 and 5097.993; (2) procedures for identifying through the NAHC the appropriate California Native American tribes; (3) procedures for continuing to protect the confidentiality of information concerning the specific identity, location, character, and use of those places, features, and objects; and (4) procedures to facilitate voluntary landowner participation to preserve and protect the specific identity, location, character, and use of those places, features, and objects.

Native American Burials (PRC Section 5097 et seq.)

State law addresses the disposition of Native American burials in archaeological sites and protects such remains from disturbance, vandalism, or inadvertent destruction; establishes procedures to be implemented if Native American skeletal remains are discovered during construction of a project; and designates the NAHC to resolve disputes regarding the disposition of such remains. The Native American Historic Resource Protection Act (PRC Sections 5097.993–5097.994) makes it a misdemeanor punishable by up to a year in jail to deface or destroy an Indian historic or cultural site that is listed or may be eligible for listing in the CRHR. In 2006, Assembly Bill (AB) 2641 (Coto) amended the PRC to provide for the protection of human remains when discovered, as well as conferral with descendants to make recommendations or preferences for treatment of human remains. A landowner, upon discovery of human remains, is required to ensure that the immediate vicinity, as described, is not damaged or disturbed, until specific conditions are met, including discussing and conferring, as defined, with the descendants regarding their preferences for treatment. The amended PRC, along with the California Native American Graves and Repatriation Act of 2001 [H&SC Section 8010-8011]) ensures that Native American human remains and cultural items are treated with respect and dignity during all phases of the archaeological evaluation process in accordance with CEQA and any applicable local regulations, and that any human bones and associated grave goods of Native American origin shall be turned over to the appropriate Native American group for repatriation.

Senate Bill 18

Signed into law in September 2004, and effective March 1, 2005, Senate Bill (SB) 18 permits California Native American Tribes recognized by the Native American Heritage Commission (NAHC) to hold conservation easements on terms mutually satisfactory to the Tribe and the landowner. The term “California Native American Tribe” is defined as “a federally recognized California Native

American Tribe or a non-federally recognized California Native American Tribe that is on the contact list maintained by the NAHC." The bill also requires that, prior to the adoption or amendment of a City or county's general plan, the City or county shall consult with California Native American Tribes for the purpose of preserving specified places, features, and objects located within the City or county's jurisdiction. SB 18 also applies to the adoption or amendment of specific plans. This bill requires the planning agency to refer to the California Native American Tribes specified by the NAHC and to provide them with opportunities for involvement.

Assembly Bill 52

Assembly Bill (AB) 52, which created the new category of "Tribal Cultural Resources" that must be considered under the California Environmental Quality Act (CEQA), applies to all projects that file a notice of preparation or notice of negative declaration or mitigated negative declaration on or after July 1, 2015. AB 52 requires lead agencies to provide notice to and begin consultation with California Native American Tribes that are traditionally and culturally affiliated with the geographic area of a project if that Tribe has requested, in writing, to be kept informed of projects by the lead agency prior to the determination whether a negative declaration, mitigated negative declaration, or environmental impact report will be prepared. If a Tribe requests consultation within 30 days upon receipt of the notice, the lead agency must consult with the Tribe. The bill also specifies mitigation measures that may be considered to avoid or minimize impacts on Tribal Cultural Resources.

Local

Historical Resources Regulations

The City's Historical Resources Regulations (San Diego Municipal Code [SDMC] Chapter 14, Article 3, Division 2) were adopted in January 2000, providing a balance between sound historic preservation principles and the rights of private property owners. The regulations have been developed to implement applicable local, state, and federal policies and mandates, including the City's General Plan, CEQA exemptions and guidelines, and Section 106 of the National Historic Preservation Act of 1966. Historical resources, in the context of the City's regulations, include site improvements, buildings, structures, historic districts, signs, features (including significant trees or other landscaping), places, place names, interior elements and fixtures designated in conjunction with a property, or other objects of historical, archaeological, scientific, educational, cultural, architectural, aesthetic, or traditional significance to the citizens of the City. These include structures, buildings, archaeological sites, objects, districts, or landscapes having physical evidence of human activities. These resources are usually over 45 years old, and they may have been altered or are still in use.

Compliance with the Historical Resources Regulations begins with the determination of the need for a site-specific survey for a project. Pursuant to SDMC Section 143.0212(a), a historic property (built environment) survey can be required when obtaining a permit for development of any parcel

containing a structure that is over 45 years old and appears to have integrity of setting, design, materials, workmanship, feeling, and association. SDMC Section 143.0212(b) requires that historical resource sensitivity maps be used to identify properties in the City that have a probability of containing historic or pre-historic archaeological sites. These maps are based on records of the California Historical Resources Information System (CHRIS) maintained by the SCIC at San Diego State University. If records show an archaeological site exists on or immediately adjacent to a subject property, the City would require a survey. In general, archaeological surveys are required when the proposed development is on a previously undeveloped parcel, if a known resource is recorded on the parcel or within a one-mile radius, or if a qualified consultant or knowledgeable City staff member recommends it. In both cases, the determination for the need to conduct a site-specific survey must be made in 10 business days for a construction permit or 30 days for a development permit pursuant to SDMC Section 143.0212(c).

SDMC Section 143.0212(d) states that if a property-specific survey is required, it shall be conducted according to the criteria included in the City's Historical Resources Guidelines. Using the survey results and other available applicable information, the City shall determine whether a historical resource exists, whether it is eligible for designation as a designated historical resource, and precisely where it is located.

Historical Resources Guidelines

The City's Historical Resources Guidelines, amended in April 2001, are designed to implement the City's Historical Resources Regulations. If any resources have been recorded on a property, those resources must be evaluated for significance/importance in accordance with the Historical Resources Guidelines. The Historical Resources Guidelines are incorporated in the City's Land Development Manual by reference. The guidelines establish a development review process to review projects in the City. This process is composed of two aspects: the implementation of the Historical Resources Regulations and the determination of impacts and mitigation under CEQA.

Historical Resources Register

The City provides a broader set of criteria for eligibility for the City's Historical Resources Register. As stated in the City's Historical Resources Guidelines, "Any improvement, building, structure, sign,

interior element and fixture, feature, site, place, district, area, or object may be designated as historic by the City's HRB if it meets any of the following criteria:

a. Exemplifies or reflects special elements of the City's, a community's, or a neighborhood's historical, archaeological, cultural, social, economic, political, aesthetic, engineering, landscaping, or architectural development;

b. Is identified with persons or events significant in local, State, or national history;

c. Embodies distinctive characteristics of a style, type, period, or method of construction or is a valuable example of the use of indigenous materials or craftsmanship;

d. Is representative of the notable work of a master builder, designer, architect, engineer, landscape architect, interior designer, artist, or craftsman;

e. Is listed or has been determined eligible by the National Park Service for listing in the National Register of Historic Places or is listed or has been determined eligible by the State Historic Preservation Office (SHPO) for listing in the State Register of Historical Resources; or

f. Is a finite group of resources related to one another in a clearly distinguishable way or is a geographically definable area or neighborhood containing improvements which have a special character, historical interest, or aesthetic value or which represent one or more architectural periods or styles in the history and development of the City.

General Plan Historic Preservation Element

The Historic Preservation Element of the General Plan provides guidance on archaeological and historic site preservation in San Diego, including the roles and responsibilities of the HRB, the status of cultural resource surveys, the Mills Act, conservation easements, and other public preservation incentives and strategies. A discussion of criteria used by the HRB to designate landmarks is included, as is a list of recommended steps to strengthen historic preservation in San Diego. The Historic Preservation Element sets a series of goals for the City for the preservation of historic resources, and the first of these goals is to preserve significant historical resources. These goals are realized through implementation of policies that encourage the identification and preservation of historical resources.

General Plan policies HP-A.1 through HP-A.5 are associated with the overall identification and preservation of historical resources. This includes policies to provide for comprehensive historic resource planning and integration of such plans within City land use plans. Historic Preservation policies HP-B.1 through HP-B.4 address the benefits of historical preservation planning and the need for incentivizing maintenance, restoration, and rehabilitation of designated historical resources. This is proposed to be completed through a historic preservation sponsorship program and through

cultural heritage tourism. Recently adopted community plan updates may also include additional community-specific policies recommended during tribal consultation.

Policy HP-A.4e states that Native American monitors should be included during all phases of the investigation of archaeological resources; this would include surveys, testing, evaluations, data recovery phases, and construction monitoring. Recently adopted community plan updates may also include additional community-specific policies related to Tribal Cultural Resources and Tribal consultation.

Significance Determination Thresholds

Thresholds used to evaluate potential impacts related to cultural and historical resources are based on applicable criteria in the CEQA Guidelines Appendix G and the City's CEQA Significance Determination Thresholds (2024). The following issue questions are addressed in this section:

1) Would the project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?
2) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?
3) Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Tribal Cultural Resources

1) Would the project 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, or 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:
   a. 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
   b. 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 Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.

4.4.3 EXISTING CONDITIONS

Cultural, Tribal Cultural and Historical Resources

Cultural (archaeological and tribal cultural) resources include prehistoric and historic locations or sites where human actions have resulted in detectable changes to the area. This can include changes in the soil and the presence of physical cultural remains. Archaeological resources can have a surface component, a subsurface component, or both. Historic archaeological resources are those originating after European contact. These resources may include subsurface features such as wells, cisterns, or privies. Other historic archaeological remains include artifact concentrations, building foundations, or remnants of structures.

Historical resources are physical features, both natural and constructed, that reflect past human existence and are of historical, archaeological, scientific, educational, cultural, architectural, aesthetic, or traditional significance. These resources may include such physical objects and features as archaeological sites and artifacts, buildings, groups of buildings, structures, districts, street furniture, signs, cultural properties, and landscapes. Historical resources in the San Diego region span a timeframe of at least the last 12,000 years and include both the prehistoric and historic periods. For purposes of this PEIR, historical resources consist of archaeological sites and built-environment resources determined to be significant under CEQA.

Natural Setting

The individual undergrounding projects to be constructed under the Project would be located throughout the City. The Project APE extends from its southwestern boundary in the Tijuana River Valley to its northeastern boundary in the San Pasqual Valley. The elevation of the Project APE ranges from approximately 20 feet above mean sea level on Point Loma peninsula to 900 feet above mean sea level in San Pasqual Valley. The setting of individual undergrounding projects range from completely developed residential communities to agricultural land to undeveloped land.

Cultural Setting

Evidence for continuous human occupation in the San Diego region spans the last 12,000 years. Various attempts to parse out variability in archaeological assemblages over this broad time frame have led to the development of several cultural chronologies; some of these are based on geologic time, most are based on temporal trends in archaeological assemblages, and others are interpretive reconstructions. Each of these reconstructions describes essentially similar trends in assemblage composition in more or less detail. This research employs a common set of generalized terms used to describe chronological trends in assemblage composition from an archaeological perspective: Paleoindian (pre-5500 BC), Archaic (8000 BC–AD 500), Late Prehistoric (AD 500–1769), and

Ethnohistoric (post-AD 1769). Native American aboriginal lifeways did not cease at European contact. "Protohistoric" refers to the chronological trend of continued Native American aboriginal lifeways at the cusp of the recorded historic period in the Americas. The tribal cultural context spans all of the archaeologically based chronologies further described in Appendix D. In order to understand the cultural setting relating to historical resources, San Diego history can be divided into the Spanish Period (1769–1821), Mexican Period (1821–1846) and American Period (1846–Present). Details regarding the historic periods of San Diego history are further described in Appendix E.

4.4.4 APPROACH AND METHODOLOGY

Background Research

An examination of existing maps, records, and reports was conducted to assess whether the Project could potentially impact previously-recorded cultural resources. A records search was conducted in December 2018 of files housed at the South Coastal Information Center (SCIC) at San Diego State University. The search encompassed the APE and a 1/8 mile buffer. A second records search was requested from the SCIC in May 2021 when additional undergrounding projects were added to the Project. The purpose of the records search is to identify any previously-recorded resources within or adjacent to the Project APE that may be impacted by proposed undergrounding activities. In addition to a review of previously-prepared site records, the records search also reviewed previously conducted cultural inventories, historical maps of the Project area, ethnographies, the NRHP, the CRHR, California Historic Resource Information System (CHRIS) database, the California Historic Property Data File, and the lists of California State Historical Landmarks, California Points of Historical Interest, California Historical Resources Inventory Database (CHRID), and Archaeological Determinations of Eligibility.

Aerial Photograph Analysis

An examination of aerial photographs and satellite images for the projects slated for implementation under the Project was also conducted. This analysis showed the current level of development surrounding each project which contributes to the cultural sensitivity associated with each project alignment. Areas that are completely paved or landscaped are unlikely to contain surface manifestations of cultural resources. Undergrounding projects located within undeveloped areas are more likely to contain surface manifestations of cultural resources.

The SCIC records showed that there are previously-recorded cultural resources located within the Project APE and intersect various anticipated undergrounding project alignments including trenching and distribution pole removal locations. Aerial photographs from Historicaerials.com were analyzed to determine the level of development before and after the recordation of the resource. In some cases, these aerial maps show that the resource has been completely destroyed or overlain by

past developments. This analysis was used to inform the sensitivity categorization which were then compared to the construction activities anticipated for each phase of construction (discussed in section 4.4.6).

Historical Resources Inventory

To determine the historical resources sensitivity of the UUP Program APE, Dudek architectural historians collected information on known or previously documented properties that qualify as historical resources under CEQA located within the Program APE.

Historical resources are physical features, both natural and constructed, that reflect past human existence and are of historical, scientific, educational, cultural, architectural, aesthetic, or traditional significance. These resources may include buildings, structures, objects, sites and districts. For the purposes of this existing conditions assessment, historical resources documented prior to this study and found to be eligible or listed in the National Register of Historic Places (NRHP), the CRHR, and/or locally designated or identified in a historic resources survey and therefore considered known CEQA historical resources are identified. In summary, historical resources most commonly consist of individual buildings or districts (residential, agricultural, industrial, and commercial), but can also include resources such as water management structures (levees, canals, dams, and ditches), other linear resources (railroad alignments, roads, and bridges), and landscapes (hardscape and softscape).

The following repositories and documents were consulted to identify previously recorded historical resources within the Program APE.

- South Coastal Information Center (SCIC);
- California Historical Resources Inventory Database (CHRID);
- Save Our Heritage Organization (SOHO);
- City of San Diego, Heritage Preservation Program

A summary of information obtained regarding historical resources in the UUP Program APE identified through review of data from these sources is provided below. Heritage Preservation Program staff also continuously updates their built environment databases to add newly designated historical resources.

<u>South Coastal Information Center Search</u>

Dudek conducted records searches on February 19, 2019, of data obtained from the SCIC at San Diego State University. The search encompassed the Program APE and adjacent parcels. The purpose of the records search is to identify any previously recorded properties that may be located in or adjacent to the Program area and to identify previous studies in the Program vicinity. In

addition to a review of previously prepared site records and reports, the records search also reviewed historical maps of the Program area, the NRHP, the CRHR, the California Historic Property Data File, and the lists of California State Historical Landmarks, California Points of Historical Interest, and Archaeological Determinations of Eligibility. The full search results are discussed in the Cultural Resources Inventory Report for the Program (DeCarlo et al. 2024). Applicable information on Historic era-built environment resources and those that qualify as CEQA historical resources are discussed in Section 5, Results.

California Historical Resources Inventory Database (CHRID)

The California Historical Resources Inventory Database (CHRID) Program promotes and protects cultural heritage through documenting and sharing information on historical resources. CHRID was developed through the California State Office of Historic Preservation's Certified Local Government Grant Program and partially funded through the Federal Historic Preservation Fund Program. The website provides public access to historical resource information that has been entered into the CHRID by the City of San Diego. This site is maintained and hosted by the City of San Diego and contains information on historic resources within the City. The information contained within this database contains resources from individual and district nominations acted upon by the Historical Resources Board and is updated periodically. It does not include all resources identified during historic surveys except when part of designated historic districts. Heritage Preservation Program staff has the most up-to-date information on designated historical resources as well as potential historic districts identified as part of surveys. Dudek reviewed the CHRID to assess information on existing CEQA historical resources located in the Program APE.

Dudek reviewed the information maintained by the CHRID on historic districts and individual resources through the CHRID website in consideration of identifying CEQA historical resources in the Program APE.

Save Our Heritage Organization (SOHO)

The Save Our Heritage Organization is a local historic preservation advocacy group with a mission to preserve, promote, and support preservation of the architectural, cultural and historical links and landmarks that contribute to the collective identity, depth, and character of our region. Dudek reviewed the information they maintain on historic districts and individual resources through their website in consideration of identifying CEQA historical resources in the Program APE.

City of San Diego, Heritage Preservation Program

The City of San Diego Heritage Preservation Program is responsible for the City's long range planning efforts, development of new ordinances and regulations, and implementing policies and regulations through the City's permitting processes relating to historical resources. Relevant to the

UUP Project, Heritage Preservation staff identifies and evaluates potential historical resources for their historic significance and reviews development projects for impacts to designated and potential historical resources per San Diego Municipal Code Chapter 14, Article 3, Division 2 and as described in the Regulatory Setting section. Through coordination with Heritage Preservation staff, Dudek was provided a list of known historic districts located within the City boundaries.

4.4.5 IMPACTS

Issue 1: Would the Project result in an alteration, including the adverse physical or aesthetic effects and/or destruction of a prehistoric or historic building (including an architecturally significant building, structure, object, site), or

Issue 2: Would the Project result in any impact to existing religious or sacred uses within the potential impact area?

Cultural Resources

Archaeological Records Search

The search of the SCIC records identified 1,128 cultural resources within 1/8 miles of the APE. Of the 1,128 identified, 296 cultural resources fall within the Project APE (see Appendix D). The prehistoric sites within the APE include 30 habitation sites, 35 artifact scatters, 8 shell scatters, 4 bedrock milling stations, 1 quarry, 35 isolates, and 1 unknown resource. The historic-period sites include 6 foundations, 2 previous farmhouses, 105 refuse scatters, 2 street furnishings, 2 cemeteries, 26 historic buildings, and 26 isolates. There are also 13 multicomponent resources consisting of 12 historic trash and prehistoric lithic scatters and 1 historic cemetery with adjacent prehistoric habitation debris. Nine of the resources within the APE have previously been evaluated and recommended eligible for listing on the CRHR, NRHP, or local listing, and 15 have been recommended not eligible. The remaining resources within the APE have not been evaluated (see Appendix D).

The records search also identified 3,231 previous archaeological studies that have been conducted within 1/8 miles of the APE. Of the 3,231 studies, 1,589 studies cover portions of the APE (see Appendix D for details).

Cultural Resource Sensitivity

Ground-disturbing activities associated with undergrounding projects have the potential to impact cultural resources when they enter undisturbed soils in culturally sensitive areas. However, if ground-disturbing activities are conducted in artificial fill or engineered soils, there is a low likelihood of impacting cultural resources. Some undergrounding projects are located in

areas that have been previously developed and therefore, preclude the existence of intact cultural deposits. This is particularly true of residential tracts that were built on hilly terrain that required extensive grading and leveling. This level of earth-moving would have displaced any cultural resources and native soils that may have been previously present. In summary, since many of the projects contain largely artificial fill or engineered earth, much of the earth-moving required for the construction of undergrounding projects would not have the potential to impact subsurface cultural resources.

Though most undergrounding projects under the UUP are in completely developed areas with disturbed soil, some projects still maintain a high level of resource sensitivity. The records search conducted for the UUP shows that cultural sites were recorded within undergrounding project alignments prior to development, or archaeological deposits were identified during subsequent ground disturbance associated with development. Ground disturbing activities within or adjacent to previously-identified resources have a moderate to high potential of impacting cultural resources. Some undergrounding projects would be located in areas that do not have defined cultural resource boundaries, but are known to be located in areas with documented ethnohistoric villages. Ethnohistoric villages are human habitation sites that were occupied at European contact, knowledge of which is ascertained through historic documents, oral history, and material culture. For example, areas such as Mission Bay, La Jolla, or Sorrento Valley have produced significant amounts of sensitive materials as a result of previous construction activities. In spite of extensive development, there is still an increased possibility that sensitive archaeological deposits could be uncovered during earthmoving construction activities in areas of known villages. Due to this increased sensitivity, ground-disturbing activities associated with certain undergrounding projects would require resource management.

Some UUP activities do not include ground-disturbance such as equipment staging or removal of overhead wiring. Though these activities have no potential to impact buried cultural deposits, they could potentially disturb adjacent archaeological resources with surface components. The probability that a non-invasive installation activity would impact an archaeological resource is specific to each project and each cultural site within the project footprint. Some projects are located in areas where no cultural resources have been previously identified, or where ground surfaces have been previously disturbed in such a manner that surficial cultural resources would have been covered or destroyed during construction. As a result, non-invasive underground utility installation activities are unlikely to impact cultural resources. There are, however, less developed areas where surficial cultural resources are located immediately adjacent to anticipated project alignments and could be impacted by a non-invasive activity such as equipment staging or cable pulling.

Cultural resource sensitivity by undergrounding project construction phase is described below. For details regarding the various activities anticipated for each phase of construction, see Chapter 3, Project Description.

Phase I: Trenching/Boring and Conduit Installation

Phase I constitutes the most ground intrusive phase of individual UUP Projects; utilities trenching will be approximately 2.5 ft wide by 5 feet deep. Trenching for conduit and excavation to install vaults as part of Phase I activities have the potential to impact buried cultural deposits if it intersects a known resource boundary that was present prior to development or previously unidentified cultural deposits within highly sensitive resource areas.

While boring activities under Phase I have a decreased potential to reveal cultural resources, the boring requires the excavation of launching pits adjacent to structures and City right-of-way. This type of excavation has the potential to impact known and previously unidentified cultural resources. Though it involves excavation, potholing to verify the location of existing underground infrastructure has a very low potential to impact unidentified buried deposits because the soil above an existing utility has been previously disturbed.

The establishment of staging areas can also potentially impact adjacent cultural resources with a surface component. The movement of machinery and personnel can displace surface artifacts or features and increase the potential for artifact removal from the site. If staging areas are established on developed land such as pavement, impacts to cultural resources would not occur.

Phase II: Cabling and Connection

Though it requires no ground disturbance, cable installation under Phase II can potentially impact adjacent cultural resources with a surface component. The placement of machinery can displace surface artifacts or features and increase the potential for artifact removal from the site. If, however, these temporary apparatuses are placed on developed land such as pavement, impacts to cultural resources would not occur.

Phase III: Cut-overs

During Phase III, once a new underground system is in place and energized, and all properties have been prepared to receive underground service, all properties would be switched over from the overhead lines to the new underground systems. These activities would not include ground disturbance or any type of surficial disturbance; therefore, Phase III does not have the potential to impact cultural resources.

Phase IV: Removal of Overhead Utilities

Though it does not involve ground disturbance, the dismantling of hardware on existing poles under Phase IV has the potential to disturb cultural resources with surface components. If cranes or aerial man-lifts are placed on an adjacent cultural resource, they can displace surface artifacts or features and increase the potential for artifact removal from the site. If, however, these temporary apparatuses are placed on developed land such as pavement, impacts to cultural resources would not occur.

If old poles are cut off at ground level, there is no potential that they will impact recorded or unidentified buried cultural resources. However, if the bases of the poles are removed, the crew may be required to partially excavate around the base of the pole to free it. This ground disturbance has limited potential of impacting cultural resources. During the installation of the utility pole, a hole is excavated with a diameter only slightly larger than the pole. When a pole is removed, previously undisturbed soil surrounding the pole must sometimes be removed to loosen the pole. The removal of this soil has the potential to impact buried cultural deposits within known resources. The installation of a new utility pole at the project boundary to aid the transition from an overhead to an underground utility system also involves excavation that has the potential to impact cultural resources.

Phases V and VI: Post-Undergrounding Improvements and Street Restoration

The installation of pedestrian curb ramps and asphalt and concrete repairs as part of post-construction improvements may require ground disturbance and would be limited to the developed right-of-way. This disturbance would be limited to the immediate ground surface which was disturbed during the initial placement of the asphalt and concrete features. These activities would only have the potential to impact cultural resources if they are located within previously identified resources.

Tree removal and planting, if required, and the installation of stand-alone street lighting fixtures, if necessary, would require excavation. These activities would have the potential to impact cultural resources.

Master Plan Amendment/Updates

This cultural resources impact analysis is based on the underground utility installation process described in this PEIR. Any future amendments or updates to the Project Master Plan will require an updated cultural resources impact analysis by a qualified archaeologist if phases or activities are altered to the extent that they pose additional impacts to cultural resources not analyzed in the inventory report. If the Master Plan amendments or updates do not pose additional potential

impacts, the procedures and mitigations described in this PEIR and the inventory report in Appendix D will continue to be applied to the Master Plan.

Program Sensitivity Categories

The cultural sensitivity of all anticipated undergrounding projects under the UUP were analyzed. To aid in the management of the undergrounding projects planned for implementation under the Project, each project is assigned a sensitivity category. These categories vary in their cultural sensitivity and undergrounding projects' potential to impact cultural resources. Refer to Appendix D, which includes an online GIS viewer database tool and Table 5-1, for full details regarding sensitivity category assignments and specific mitigation measures for each of the projects analyzed.

Category 1

Projects assigned to Category 1 are located in the least culturally sensitive regions. No significant previously-recorded cultural resources have been identified within Category 1 project footprints. Similarly, Category 1 projects are not located in sensitive areas where ethnographic villages were known to exist or where previous development has unearthed cultural material.

Therefore, Category 1 projects will not require mitigation measures. An in-house record search is recommended.

Category 2

Undergrounding projects assigned to Category 2 are located in at least moderately sensitive areas. Previous cultural resources have been identified within Category 2 project footprints; however, no currently-proposed ground disturbance, such as trenches or pole removals, is located within a known resource site boundary. Category 2 projects are located in areas reported to have contained ethnographic villages or are adjacent to areas where cultural materials have been previously recovered.

Therefore, given the sensitivity level of these areas, Category 2 projects should be monitored.

Category 3

Projects assigned to Category 3 contain proposed ground disturbing activities within previously-recorded cultural resources boundaries. These resources have been evaluated and determined to be not significant or were destroyed or covered by development. Some Category 3 undergrounding projects may intersect highly sensitive cultural resources and may require data recovery during project activities. Potentially impacted resources that have not been evaluated or have not been covered by development are included in Category 4 undergrounding projects, as described below. These types of resources require further study or evaluation testing, and as such cannot be included in Category 3 undergrounding projects.

Therefore, given the sensitivity level of these areas and presence of cultural resources, Category 3 projects should be monitored. Additional mitigation measures may be required, such as avoidance or data recoveries, if the project includes a significant resource.

Category 4

Undergrounding projects with ambiguous impacts have been assigned to Category 4. The boundaries of these projects have not been firmly established nor have their proposed ground disturbance. These projects are often located in undeveloped areas and include lands that have not been archaeologically surveyed. These areas may contain cultural resources that could be potentially impacted by future UUP activities. Due to the unknown location of ground disturbance and the unknown cultural sensitivity of the project areas, potential impacts of these projects cannot be determined without further evaluation. For this reason, Category 4 projects require further cultural analysis once the parameters of these undergrounding projects are known, and an adequate assessment of the potential impacts to cultural resources can be conducted.

Therefore, due to the ambiguity of impacts and undeveloped areas, Category 4 projects will require an initial study, this may include a record search, survey, and/or testing resources for a significance evaluation.

Summary of Utilities Undergrounding Program Cultural Resources Sensitivity

Table 4.4-1 presents a summary of the number of undergrounding projects assigned to each sensitivity category. Though a high number of cultural resources (n=212) are located within the low sensitivity Category 1 undergrounding projects, these 212 resources consist largely of historic addresses, sidewalk stamps, or isolates that are not considered significant historical resources. These resources will not be impacted by trenching activities within the streets or residential yards. The appropriate treatment for Decorative Surfaces will abide with San Diego Municipal Code Section 62.1219 (Chapter 6, Article 2, Division 12), additional information on the treatment of built-environment resources is discussed in the Historical Resources section of this EIR. Additionally, converting a historic address to underground utilities is exempt from further review. The highest frequency of known resources (n=599) is in a higher sensitivity category (Category 3), which is to be expected since one of the qualifiers of a Category 3 undergrounding project is that activities are proposed within a known resource boundary. Indeed, Category 3 undergrounding projects (n=124) contain a sum total of 599 resources, with only one project, UU588, containing no resources. The City determined that UU588 has a high cultural sensitivity despite a lack of known resources within the project (see City Analyzed Projects below). It is important to note that not all projects in any category contain resources. In fact, only 64 resources were identified in the 132 Category 4 undergrounding projects, indicating that sensitivity is affected by more than just the presence of a known site, but also by the presumed risk of uncovering resources during Project implementation.

Moreover, the recorded presence of sites does not indicate a high sensitivity since many of the sites intersecting Category 2 and Category 3 undergrounding projects have been destroyed or have a low potential for impact during Project implementation. It is important to note that Category 4 undergrounding projects require further analysis due to a lack of project parameters, not necessarily because of a heightened sensitivity. Category 4 projects are often located in undeveloped areas and include lands that have not been archaeologically surveyed, hence their need for further cultural review.

Table 4.4-1
Projects Ranked by Sensitivity Category and Archaeological Site Frequency

Archaeological Sensitivity Category	Total Projects by Sensitivity Category	Total No. Recorded Sites within Project Footprints
1	272	212
2	287	484
3	124	599
4	132	301
Grand Total	**815**	**1,596**

The City of San Diego has previously established a cultural resources sensitivity model and provided Dudek with GIS data showing which portions of the City of San Diego are culturally sensitive. Dudek has taken the City's sensitivity model into account for this analysis. Table 4.4-2 shows the relationship between the current analysis and the City's sensitivity model. In 2023, the City of San Diego produced a Citywide sensitivity map which incorporates the data used in this analysis, this Citywide map will be used in future Project reviews.

Table 4.4-2
Frequency of Projects by Sensitivity Category and City of San Diego Sensitivity Model

Within City Model Sensitivity Area?			
Archaeological Sensitivity Ranking	*No*	*Yes*	*Total*
1 (low)	230	42	272
2	15	272	287
3	14	110	124
4 (high)	14	118	132
Total	**273**	**542**	**815**

As expected, at the time of this analysis, a large number of undergrounding projects with moderate to high cultural sensitivity (Category 2 and Category 3) fall within the City's sensitivity model. Because Category 4 undergrounding projects often consist of undeveloped project areas and the City's sensitivity model includes large amounts of undeveloped land, a large proportion of Category 4 undergrounding projects are within the City's sensitivity model (89%). Also expected, a high percentage of Category 1 undergrounding projects are outside of the City's sensitivity model (85%).

City Analyzed Projects

In addition to the undergrounding projects in the 2018 Utilities Undergrounding Program Master Plan, this study also includes 13 additional undergrounding projects that were allocated from the previous master plan but had not yet completed environmental review in accordance with CEQA. These undergrounding projects were already submitted to the Development Services and City Planning Departments for review through the City's Public Project Assessment process and determined to have a potential for impacting cultural and tribal cultural resources. After certification of the PEIR, each of these 13 undergrounding projects that move forward to City Council for district formation will be covered by the analysis in the PEIR and will be required to implement the appropriate mitigation measures.

The specific intensity and location of construction activities for these 13 undergrounding projects are known, which allows for location-specific assessments of cultural resources impacts. Records search analysis of these 13 undergrounding projects revealed varying resource sensitivities ranging from low to high. Nine of these projects were found to have moderate potential to impact cultural resources (Table 4.4-3. Projects Previously Analyzed by City of San Diego). The City has determined that these nine moderately sensitive projects require full-time archaeological and Native American monitoring pursuant to mitigation measure **MM-CR-1** (Section 4.4.8).

The cultural sensitivity of the other four undergrounding projects were found to be extremely high and an increased likelihood of impacting cultural resources (Table 4.4-3. Projects Previously Analyzed by City of San Diego). Construction activities for these four projects intersect or are immediately adjacent to significant archaeological sites. These sites include prehistoric habitation sites, CRHR recommended sites, a California Register of Historic Landmark, Ystagua, a nationally and locally designated prehistoric and ethnohistoric village (NRHP Reference #75000466; City of San Diego HRB #924), and a locally designated Protestant Cemetery Site (HRB #47) (P-37-028799). Due to the extreme cultural sensitivities of these four projects, the City has determined that, archaeological and Native American monitoring is required, in addition, two of these four projects require avoidance or data recovery during construction. Avoidance is identified in **MM-CR-1** under **Phase II** and is determined on a case-by-case basis, the recommended method for these projects is boring, this method would avoid the cultural resources by performing ground disturbance beyond the extend of the cultural resource present. In the case that boring is not a feasible method, a data

recovery will be required. The objective of the data recovery is to identify archaeological deposits that convey the significance of known archaeological sites, recover statistically relevant data from those deposits, and provide appropriate treatment of human remains and grave goods, should any be identified. Data recovery methods are site specific and may take the form of archaeological excavation within known cultural deposits or archaeological sampling at specified intervals within sediments with a high potential to contain cultural deposits as they are exposed following hardscape removal. Methodology for data recovery will be specified within an Archaeological Data Recovery Program (ADRP) prepared for each project and included in the project Cultural Resources Monitoring and Treatment Plan (CRMTP) per mitigation measure **MM-CR-1** under **Phase III**: *Archaeological Data Recovery Program (ADRP).*

Table 4.4-3
Projects Previously Analyzed by the City of San Diego

Undergrounding Project	Project Name	Cultural Sensitivity	Management
UU78	Soledad Road	Moderate	Monitoring
UU182	Block 4W	Moderate	Monitoring
UU190	Cable Street Phase 1	Moderate	Monitoring
UU310	Block 1A	Moderate	Monitoring
UU339	Cable Street Phase 2	Moderate	Monitoring
UU407	Block 2D3	Moderate	Monitoring
UU599	India Street	Moderate	Monitoring
UU660	Block 1B	Moderate	Monitoring
UU827	Block 8Q	Moderate	Monitoring
UU76	Sorrento Valley Road	High	Monitoring Avoidance or Data Recovery
UU852	Block 2F	High	Monitoring; Avoidance or Data Recovery
UU157	Block 2K	High	Monitoring
UU588	El Camino Real	High	Monitoring

Future or Modified Undergrounding Projects

The cultural resources inventory report summarizes the cultural sensitivity analysis of all anticipated undergrounding projects in relation to the proposed Project activities. The undergrounding project boundaries, as they are currently known, were analyzed for their potential to impact cultural resources and assigned to sensitivity categories as described above. Should the boundary of the undergrounding projects be modified in the future, it is possible that their potential to impact cultural resources will

change. If future planning should require the modification of their boundary, the modified project boundary must be reviewed by a qualified archaeologist. The archaeologist shall determine if the modified boundary is within the 2019 records search boundary, analyze the modified undergrounding project's potential to impact cultural resources, and assign it to the appropriate category to ensure that the appropriate mitigation is performed. Likewise, any new undergrounding projects must be reviewed by a qualified archaeologist, assessed whether the existing records search is sufficient or a new records search is required, and assigned to a sensitivity category based on its potential to impact cultural resources. These reviews are likely to be completed by City staff, but may also be assigned on a project specific basis to consulting archaeologists.

Therefore, impacts to cultural and tribal cultural resources as a result of implementation of Project activities, including undergrounding projects, would be **potentially significant** absent **MM-CR-1**.

Historical Resources

Based on the sources of information noted in Section 4.4.5, Approach and Methodology, the following text provides a summary of the types of known historical resources located within the UUP Program APE:

Thirty (30) designated historical districts were identified within the City boundaries at baseline for this PEIR and overlap in many areas of the UUP Program APE. Appendix E, Historical Resources Inventory Report, provides a list of these historic districts along with pertinent information including significance designation and jurisdiction (see Appendix A of Appendix E, Historical Resources Inventory Report). Various potential historic districts are also identified through reconnaissance surveys often accompanying community plan updates as part of the City Planning Department's work program. The historic significance of a potential historic district and its eligibility for designation is not evaluated until a subsequent intensive level survey is complete. The list of surveys of potential historic districts underway and their status can be viewed on the City Planning Department's website and by contacting Heritage Preservation Program staff.

- The historic districts listed in Appendix A of Appendix E are considered historical resources for the purposes of CEQA.

Appendix B of Appendix E, Historical Resources Inventory Report, provides a table of built environment historic era properties that have been previously identified, recorded, or evaluated and were identified through SCIC records search data. Below is a summary and general quantifications of important categories regarding properties identified through the records search:

- Listed or Eligible for listing in the NRHP, CRHR, or locally significant, this number includes individual buildings and historic district contributing buildings/features: **410**

    - These properties are considered historical resources for the purposes of CEQA.
- Categorized as requiring re-evaluation or further study to determine historic significance: **58**
    - These properties are considered potential historical resources for the purposes of CEQA.
- Properties that have been evaluated and found ineligible or have a determination of ineligibility from the California Office of Historic Preservation: **255**
    - These properties are not considered historical resources for the purposes of CEQA. No further work or study on these properties is required relative to project level work that is implemented through the UUP Program.

Dudek developed a confidential online GIS Viewer "City of San Diego Utilities Undergrounding Project-Cultural", which provides the non-confidential locations of the above noted properties and related categorizations, and their intersection in the UUP Program APE.

As part of their role in identifying and evaluating potential historic resources for their historic significance, Heritage Preservation Program staff routinely updates CHRID when historical districts are intensively surveyed and when new historical resources are reviewed by the Historical Resources Board.

Historical Resources Sensitivity

Overhead utility systems are not considered significant character defining features of a historical district or an individually designated historic property and therefore removal of these systems is not considered a significant impact to historical resources. However, activities associated with construction of new utility undergrounding projects such as trenching or/boring and conduit installation, and cabling has the potential to impact historical resources. For details regarding the various activities anticipated for each phase of construction, see Chapter 3, Project Description. The Project has the potential to encounter various types of designated and potentially significant historical resources found within private parcels or the public right-of-way. These typically fall into the categories of buildings of various types, structures such as bridges and sidewalks, and objects such as subdivision markers, light fixtures, sidewalk stamps, signs or street furniture.

Phase I: Trenching/Boring and Conduit Installation

Phase I is the most ground-intrusive phase of the Project. Trenching for conduit and excavation to install vaults has the potential to impact historical resources. Although asphalt paving within the public right-of-way is typically not identified as a historical resource, other structures such as bridges and sidewalks may be historic as well trees, hardscape and other features that are identified as part of historical designation of private property and can be directly affected by trenching and excavation. Also, if trenching or excavation would occur within a few feet of a historical resource, potential indirect impacts could occur as a result of groundborne vibration from construction

equipment and related activities. While digging laterals from the main trench to a historical resource may also generate groundborne vibration, it is anticipated that the equipment used for such work would be smaller in size and wheeled; therefore, such equipment is unlikely to produce enough groundborne vibration to impact a historical resource.

Phase II: Cabling and Connection

The installation of new transformers, cable boxes, and pedestals are not considered significant intrusions on designated historical districts that would adversely affect their ability to convey their significance as collective resources. Additionally, the introduction of these components to the built environment would not have the potential to impact historical resources by inserting a non-historic component onto an individual property.

Phase III: Cut-Overs

Once a new underground system is in place and energized, and all properties have been prepared to receive underground service, all properties would be switched over from the overhead lines to the new underground systems. As such, Phase III does not have the potential to impact historical resources.

Phase IV: Removal of Overhead Utilities

The removal of appurtenances connecting a pole to a historical resource would not cause an impact to historical resources as it simply removes a non-character defining feature of the resource.

Phases V and VI: Post-Undergrounding Improvements and Street Restoration

Regarding the installation of replacement streetlights, historic districts may have distinctive street lighting that can be considered a character-defining feature of that district as opposed to current standard light fixtures. As such, the removal and installation of non-standard light fixtures may cause an impact to historical resources.

Additionally, the installation of pedestrian curb ramps and asphalt and concrete repairs as part of post-construction improvements may require removal of portions of original sidewalks and paving (including sidewalk stamps) within potential and designated historical districts. As such, paving removal and the installation of new pacing may cause an impact to historical resources.

Section 142.0670 (b)(1) of the Land Development Code (LDC) requires that specific street improvements be constructed to preserve historic design elements in specific neighborhoods; including the location, width, elevation, scoring pattern, texture, color and materials to the satisfaction of the City Engineer. Section 142.0670(b)(2) requires that all existing fluted-pole, post-top street light standards be maintained or replaced in-kind as redevelopment occurs. Compliance with

these regulations would reduce impacts to potential historic districts and compliance with these regulations in conjunction with the Historical Resources Regulations would reduce impacts to designated historical districts.

Therefore, if a particular installation activity or entire phase does not have the potential to impact a historical (built environment) resource, then the activity does not require further historical resource review or management. Phase I – Trenching/Boring and Conduit Installation and Phases V and VI – Post Undergrounding Improvements and Street Restoration have the potential to impact historical resources. Phase II – Cabling and Connection, Phase III Cut-Overs, and Phase IV – Removal of Overhead Utilities, do not have potential to impact historical resources. If an activity does have the potential to impact a historical resource within a specific project footprint, impacts would be **potentially significant**, and some level of historical resource review and management is required through compliance with the Municipal Code and implementation of mitigation.

Issue 3: The disturbance of any human remains, including those interred outside of formal cemeteries.

Avoiding impacts to human remains may be unavoidable in certain circumstances if unknown resources are discovered during construction. Project activities that involve no ground disturbance would have low potential to disturb human remains. For proposed ground-disturbing activities (trenching or boring, pole removal, and some post undergrounding improvements), there is a potential to encounter human remains. However, if these ground-disturbing activities are conducted in artificial fill or engineered soils, then these activities would have a low potential to disturb human remains. Despite areas of previous disturbance, Project activities that would include ground disturbance have the potential to impact human remains and impacts would be **potentially significant** absent **MM-CR-1**.

Tribal Cultural Resources

Issue 1: 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:

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

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 Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Ground-disturbing activities associated with undergrounding projects have the potential to impact tribal cultural resources when they enter undisturbed soils in culturally sensitive areas. However, if ground-disturbing activities are conducted in artificial fill or engineered soils, there is a low likelihood of impacting cultural resources. Some undergrounding projects are located in areas that have been previously developed and therefore, preclude the existence of intact cultural deposits. Areas of previous substantial earth-moving activities would have displaced any cultural resources and native soils that may have been previously present. In summary, since many of the projects contain largely artificial fill or engineered earth, much of the earth-moving required for the construction of undergrounding projects would not have the potential to impact subsurface tribal cultural resources. However, although most undergrounding projects under the UUP would be located in completely developed areas with disturbed soil, some projects still maintain a high level of resource sensitivity.

A search of the NAHC Sacred Lands File was conducted for the Project APE and the NAHC results letter indicated that the search was positive; however, specific locations and details of resources were not provided. Outreach letters were sent to Native American representatives to solicit information concerning tribal cultural resources within the Project APE. To date, there has been one response to these outreach letters (outreach letters are included in Appendix D, Cultural Resources Inventory Report). Ray Teran, Resource Manager with Viejas Band of Kumeyaay Indians, replied via letter and stated that “the project area may contain many sacred sites.” Mr. Teran requested that any identified sacred sites be avoided with adequate buffers and that all regulations be observed. City consultation under AB 52 is ongoing.

Tribal Cultural Resources are identified under California’s Public Resource Code 21074. Notwithstanding information on tribal cultural resources received by the City to date, no tribal cultural resources have been identified that would be impacted by Project implementation.

Existing regulations and consultation under AB 52 would reduce potential impacts to tribal cultural resources; however, implementation of these regulations would not ensure the protection of all tribal cultural resources including unanticipated resources that have yet to be identified, would not be known in advance, and could be discovered and/or destroyed during construction. There is no feasible mitigation available to ensure damage or destruction of a tribal cultural resource would not occur. Therefore, because existing regulations and information received during AB 52 consultation would not prevent the loss of every known or unanticipated tribal cultural resource in the Project APE, this impact is considered **potentially significant**.

4.4.6 SIGNIFICANCE OF IMPACTS

Cultural Resources

Issue 1 and Issue 2

If a particular installation activity or entire phase does not have the potential to impact a cultural resource, then the activity does not require further cultural resource management. Phase III – Cut-overs is the only phase that does not have potential to impact cultural resources. If an activity does have the potential to impact a cultural resource within a specific project footprint, impacts would be **potentially significant**, and some level of cultural resource management is required through implementation of mitigation. It is possible for the same activity to be exempt from further management for one undergrounding project while requiring further management for another undergrounding project under the UUP.

Issue 3

Project activities that would include ground disturbance have potential to impact human remains; therefore, impacts would be **potentially significant**.

Historical Resources

Issue 1 and Issue 2

If a particular installation activity or entire phase does not have the potential to impact a historical (built environment) resource, then the activity does not require further historical resource review or management. Phase I – Trenching/Boring and Conduit Installation and Phases V and VI – Post Undergrounding Improvements and Street Restoration have the potential to impact historical resources. Phase II – Cabling and Connection, Phase III Cut-Overs, and Phase IV – Removal of Overhead Utilities, do not have potential to impact historical resources. If an activity does have the potential to impact a historical resource within a specific project footprint, impacts would be **potentially significant**, and some level of historical resource review and management is required through compliance with the Municipal Code and implementation of mitigation.

Tribal Cultural Resources

Issue 1

Existing regulations and consultation under AB 52 would reduce potential impacts to TCRs; however, implementation of these regulations would not ensure the protection of all TCRs including unanticipated TCRs that have yet to be identified, would not be known in advance, and could be

discovered and/or destroyed during construction. There is no feasible mitigation available to ensure damage or destruction of a TCR would not occur. Therefore, because existing regulations and information received during AB 52 consultation would not prevent the loss of every known or unanticipated TCR in the Project APE, this impact is considered **potentially significant**.

4.4.7 MITIGATION, MONITORING, AND REPORTING

Cultural Resources and Tribal Cultural Resources

Mitigation measures are required to reduce potentially significant impacts to archaeological cultural and tribal cultural resources. The UUP Sensitivity Categories guide the application of mitigation measures to each undergrounding project. For instance, ***undergrounding*** projects that are designated to Category 1 have low sensitivity and pose no potential impact to significant cultural resources; therefore, mitigation would be minimal for Category 1 projects. Conversely, ***undergrounding*** projects that are designated to Category 3 are moderately to highly sensitive and have an increased potential to impact cultural resources. These undergrounding projects would require mitigation measures as specified below and listed in Confidential Appendix D, Online GIS Viewer "City of San Diego Utilities Undergrounding Project-Cultural", of the EIR, in the form of cultural monitoring or possible avoidance.

Additionally, the potential exists for encountering unknown resources during ground-disturbing activities. To manage unanticipated encounters, the procedures established in the City's *Whitebook* – *Standard Specification for Public Works Construction* (*Whitebook*) (City of San Diego 2021) shall be implemented for all City initiated Projects. Section 6-6.2 of the *Whitebook* specifically requires that in the event unanticipated resources such as Native American or archaeological items are identified subsurface, soil disturbance in the area of discovery must cease until the item is properly evaluated and salvaged. The procedures of the *Whitebook* shall apply to all Project construction phases for all undergrounding projects, including those undergrounding projects designated to Category 1.

The mitigation measure listed below has been designed to fulfill the requirements of the CEQA Statutes and Guidelines and the City's Historical Resources Guidelines. The City would be the lead agency implementing the archaeological cultural and tribal cultural resources mitigation measure.

Implementation of the following mitigation measure could reduce significant impacts to cultural resources and tribal cultural resources however, it is not possible to ensure the protection of resources at a program level of review. Therefore, the impacts to cultural and tribal cultural resources remains **significant and unavoidable**.

MM-CR-1 Archaeological and Tribal Cultural Resources

Prior to the issuance of any discretionary permit for a future development project that could directly and/or indirectly affect a cultural resource (i.e. archaeological and Tribal Cultural resources), the City shall require the following steps be taken to determine (1) the potential presence and/or absence of cultural resources, and (2) the appropriate mitigation for any significant resources that may be impacted. For the purposes of CEQA review, a cultural resource is defined in CEQA Guidelines Section 15064.5. Tribal Cultural resources are defined in Public Resources Code Section 21074.

Initial Determination

The City's Environmental Designee shall determine the potential presence and/or absence of cultural resources at the project site by reviewing site photographs and existing historic information (e.g., Archaeological Sensitivity Maps, the Archaeological Map Book, the California Historical Resources Inventory System, and the City's "Historical Inventory of Important Architects, Structures, and People in San Diego") and may conduct a site visit. A review of the cultural resources sensitivity map shall be done at the initial planning stage of a project to ensure that cultural resources are avoided and/or impacts are minimized to the extent feasible in accordance with the City's Historical Resources Guidelines. The sensitivity levels described below shall guide the appropriate steps necessary to address the potential resources. Sensitivity ratings may be adjusted based on the amount of disturbance that has occurred, which may have previously impacted cultural resources, as well as new data available to the City.

> **High Sensitivity**: Indicates locations where significant cultural resources have been documented or would have the potential to be identified. High sensitivity resources include village and habitation sites and areas near fresh water sources. These resources may range from moderately complex to highly complex, with more defined living areas or specialized work space areas, and a large breadth of features and artifact assemblages. The potential for identification of additional resources in such areas would be high.
>
> **Moderate Sensitivity**: Indicates that some cultural resources have been recorded within the area or the area was developed before 1984 when CEQA review may not have been applied. Moderate sensitivity resources consist of diversity or density of feature and artifact types (e.g., a moderately dense lithic scatter).
>
> **Low Sensitivity**: Indicates areas where there is a high level of disturbance or development, and few or no previously recorded cultural resources are present based on records search results and due to the timing of development of the project site occurring after 1984 when CEQA would have been applied. Within these areas, the potential for additional resources to be identified would be low.

Phase I

Based on the results of the initial determination, if there is any evidence that the project area contains archaeological and/or tribal cultural resources, a site-specific records search and/or survey may be required and shall be determined on a case-by-case basis by the City's Environmental Designee. If a cultural resources study is required, it shall be prepared consistent with the City's Historical Resources Guidelines. All individuals conducting any phase of the cultural resources program shall meet the professional qualifications in accordance with the City's Historical Resources Guidelines. The cultural resources study shall include the background research conducted as part of the initial determination. This includes a record search at the South Coastal Information Center (SCIC) at San Diego State University. A review of the Sacred Lands File maintained by the Native American Heritage Commission (NAHC) shall also be conducted at this time. The cultural resources study shall include a field survey and/or an evaluation of significance, as applicable if cultural resources are identified, based on the City's Historical Resources Guidelines. Native American participation shall be required for all field work.

Phase II

Once a cultural resource (as defined in the Public Resources Code) has been identified, a significance determination shall be made. If a project were to impact areas identified as low sensitivity, it is assumed that any significant cultural resources no longer hold integrity or are not present. If a project impacts these areas, no additional mitigation measures shall be required.

If a project were to impact areas identified as moderate sensitivity, a site-specific records search and/or survey may be required on a case-by-case basis. If cultural resources are identified in the records search and/or survey, a significance evaluation for the identified cultural resources shall be required. If no significant resources are found and site conditions are such that there is no potential for further discoveries, then no further action shall be required. Resources found to be non-significant as a result of a survey and/or assessment shall require no further work beyond documentation of the resources on the appropriate Department of Parks and Recreation site forms and inclusion of the results in the survey and/or assessment report. If no significant resources are found, but results of the initial evaluation indicate there is still a potential for resources to be present in portions of the property, then mitigation monitoring shall be required. If the resource has not been evaluated for significance, a testing plan shall be required. If the resource is determined to be significant, a testing plan, data recovery plan, and mitigation monitoring shall be required.

If a project were to impact areas identified as high sensitivity, a survey and testing program may be required by the qualified archaeologist to further define resource boundaries subsurface presence or absence and determine the level of significance. A thorough discussion of testing methodologies including surface and subsurface investigations can be found in the City's Historical Resources

Guidelines. The results from the testing program shall be evaluated against the Significance Thresholds found in the City's Historical Resources Guidelines. If significant cultural resources are identified within the area of potential effects, the site may be eligible for local designation.

Preferred mitigation for direct and/or indirect impacts to cultural resources is to avoid the resource through project redesign. If the resource cannot be entirely avoided, all prudent and feasible measures to minimize harm shall be taken. Mitigation measures such as, but not limited to, a Research Design and Archaeological Data Recovery Program (ADRP), construction monitoring, site designation, capping, granting of deeds, designation of open space, and avoidance and/or preservation shall be required and shall be determined by the City's Environmental Designee on a case-by-case basis.

Phase III

Archaeological Data Recovery Program (ADRP)

If a cultural resource is found to be significant and preservation is not an option, a Research Design and Archaeological Data Recovery Program (ARDP) shall be required, which includes a Collections Management Plan for review and approval by the City's Environmental Designee. The ADRP shall be based on a written research design and is subject to the provisions as outlined in Public Resources Code Section 21083.2. The ADRP shall be reviewed and approved by the City's Environmental Designee prior to distribution of a draft CEQA document.

Local Designation of Resources

The final cultural resource evaluation report shall be submitted to Historical Resources Board (HRB) staff for designation. The final cultural resource evaluation report and supporting documentation will be used by HRB staff in consultation with qualified City staff to ensure that adequate information is available to demonstrate eligibility for designation under the applicable criteria.

Monitoring and Archaeological Resource Reports

Archaeological monitoring may be required during building demolition and/or construction grading when significant cultural resources are known or suspected to be present on a site but cannot be recovered prior to grading due to obstructions such as, but not limited to, existing development, dense vegetation, or if a data recovery did not reduce the impact to the resource. Monitoring shall be documented in a consultant site visit record.

Native American participation shall be required for all subsurface investigations, including geotechnical testing and other ground disturbing activities whenever there is a tribal cultural resource or any archaeological site. In the event that human remains are encountered during data

recovery and/or a monitoring program, the provisions of Public Resources Code Section 5097 shall be followed. In the event that human remains are discovered during project grading, work shall halt in that area and the procedures set forth in the Public Resources Code (Section 5097.98) and State Health and Safety Code (Section 7050.5), and in the federal, State, and local regulations described above shall be undertaken. These provisions shall be outlined in the Mitigation Monitoring and Reporting Program (MMRP) included in a subsequent project-specific environmental document. The Most Likely Descendent shall be consulted during the preparation of the written report, at which time they may express concerns about the treatment of sensitive resources.

Archaeological Resource Reports shall be prepared by qualified professionals as determined by the criteria set forth in Appendix B of the City's Historical Resources Guidelines. In the event that a cultural resource deposit is encountered during construction monitoring, a Collections Management Plan shall be required in accordance with the project's MMRP. The disposition of human remains and burial related artifacts that cannot be avoided or are inadvertently discovered is governed by State (i.e., AB 2641 [Coto] and California Native American Graves and Repatriation Act [CalNAGPRA] of 2001 [Health and Safety Code 8010- 8011]) and federal (i.e., federal NAGPRA [USC 3001-3013]) law, and must be treated in a dignified and culturally appropriate manner with respect for the deceased individual(s) and their descendants. Any human bones and associated grave goods of Native American origin shall be turned over to the appropriate Native American group for repatriation, as identified by the Native American Heritage Commission.

Arrangements for long-term curation must be established between the applicant/property owner and the consultant prior to the initiation of the field reconnaissance, and must be included in the archaeological survey, testing and/or data recovery report submitted to the City for review and approval. Curation must be accomplished in accordance with the California State Historic Resources Commission's Guidelines for the Curation of Archaeological Collection (dated May 7, 1993) and, if federal funding is involved, Title 36 of the Code of Federal Regulations Part. Additional information regarding curation is provided in Section II of the Historical Resources Guidelines.

Historical Resources

Mitigation measures are required to reduce potentially significant impacts to historical resources. Each mitigation measure has been designed to fulfill the requirements of the CEQA Statutes and Guidelines and the City's Historical Resources Guidelines. The City would be the lead agency implementing all historical resources mitigation measures.

Impacts to historical resources will be reduced through compliance with the Municipal Code and the Historical Resources Regulations as described in the Regulatory Setting section. Additionally, implementation of the following mitigation measures could reduce significant impacts to historical

resources; however, it is not possible to ensure the protection of resources at a program level of review. Therefore, impacts to historical resources remains **significant and unavoidable**.

MM-HR-1 Identification of Historical Resources. During UUP district creation, and as part of pre-construction planning, identification of designated historical resources (e.g. individual buildings/homes, historic districts) as well as potentially significant historical districts identified through City reconnaissance surveys will be conducted by the Project Engineer or other Utilities Undergrounding Program staff representative in consultation with Heritage Preservation staff to ensure proper review and permit processing. Available databases will be reviewed for designated historical resources (including historical districts). Structures and objects within the public right-of-way such as historic signs that are 45 years old or older may require evaluation for their historic significance by a qualified consultant if Heritage Preservation staff determines that the structure or object may have historic significance and if it is proposed to be demolished or altered by Program construction activities.

MM-HR-2 Project Design. To avoid impacts to designated historical resources as well as potentially significant historical resources 45 years old or older, the following design measures or additional reporting will be implemented by project proponents such as the Project Engineer whether the Program activity requires a permit or not. The project proponent may also initiate consultation with Heritage Preservation staff when modifications are proposed to buildings, structures and objects that are 45 years old or older and a permit is not required.

A. For all program activities within UUP Districts:

    1. Modifications to primary or front (street facing) building facades shall be avoided. New or relocated electric service boxes and exterior conduits shall be located on side or rear building elevations.

    2. Within front and street side yard areas, trenching for conduit installation should avoid demolition of hardscape elements from the original building's construction date/period such as masonry or concrete site walls, driveways, pathways and terraces where practical.

B. For all program activities within UUP Districts that are located on a property that contains a designated resource, or within the boundaries of a designated historical district or potential historical district identified in a City reconnaissance survey:

    1. Repair and replacement of existing concrete curb, gutter and sidewalks should replicate historic design elements, including scoring patterns and unique colors.

Historic sidewalk stamps within areas to be replaced should be photo documented, sawcut, and re-set in the same location or as close as possible in the same orientation.

4.4.8 SIGNIFICANCE OF IMPACTS AFTER MITIGATION

Cultural and Tribal Cultural Resources

Implementation of mitigation measure MM-CR-1 could reduce significant impacts to cultural resources and tribal cultural resources; however, it is not possible to ensure the protection of resources at a program level of review. Therefore, the potential impacts to cultural and tribal cultural resources would remain **significant and unavoidable**.

Historical Resources

Impacts to historical resources will be reduced through compliance with the Municipal Code and the Historical Resources Regulations as described in the Regulatory Setting section. Additionally, implementation of mitigation measures **MM-HR-1** and **MM-HR-2** could reduce significant impacts to historical resources; however, it is not possible to ensure the protection of resources at a program level of review. Therefore, the potential impacts to historical resources remains **significant and unavoidable.**

4.5 LAND USE

4.5.1 INTRODUCTION

This section describes the existing land use setting of the City of San Diego (City) Utilities Undergrounding Program (Project), identifies the applicable regulatory framework, evaluates potential impacts associated with land use that would result from the Project, identifies mitigation measures, if necessary, to reduce the level of impact associated with implementation of the Project, and identifies the level of significance after mitigation. Information in this section is from applicable environmental plans, including the *City of San Diego General Plan*, San Diego Municipal Code (SDMC), and Community Plans.

4.5.2 EXISTING CONDITIONS

Land uses within the City are addressed through the General Plan, Community Plans, and the SDMC. Chapter 13 of the SDMC serves as the City's zoning ordinance. Project improvements would be implemented throughout the City in various land use designations. The existing utilities system consists of both overhead and underground systems. The City does not own or maintain this infrastructure but has agreements with the private utility companies to allow them to operate within public lands that the City manages. The majority of that land is dedicated street right-of-way (ROW), and the City allows utility companies to use the ROW under a "franchise agreement." San Diego Gas & Electric Company (SDG&E) provides electric and gas service within the City. The majority of utility poles are owned by SDG&E, who in turn leases air space to a number of utility companies that provide telephone, cable TV, and broadband utilities. As of July 2024, a total of approximately 460 miles of overhead utilities have been converted to underground, with approximately 1,000 miles of overhead utility lines remaining (Redmond, pers. comm., 2024).

4.5.3 REGULATORY SETTING

Federal

Coastal Zone Management Act

The Coastal Zone Management Act, passed in 1972 (16 USC 1451–1464), established a federal coastal zone management policy and created a federal coastal zone. The act provides for the management of the nation's coastal resources. The goal is to "preserve, protect, develop, and where possible, to restore or enhance the resources of the nation's coastal zone" (16 USC 1452). Enactment of the Coastal Zone Management Act provided a policy and source of funding for implementation of federal goals in coastal states. The California Coastal Act, described below, is the state law corresponding to the federal act and affects the Project area.

State

California Public Utilities Commission General Order No. 131-D

Although undergrounding projects under California Public Utilities Commission (CPUC) jurisdiction are exempt from local land use and zoning regulations and discretionary permitting (i.e., they would not require any land use approval that would involve a discretionary decision to be made by a local agency such as a planning commission, city council, or county board of supervisors), General Order No. 131-D, Section XIV.B, requires that in locating a project "the public utilities shall consult with local agencies regarding land use matters." The public utility is required to obtain any required non-discretionary local permit.

California Public Utilities Commission Decision 73078

In 1967, the CPUC issued Decision 73078, which established rules for electric and communication utility service connections and overhead conversions. The Decision also created tariff rules, titled Rule 20, which mandated that utilities allocate funds annually for the conversion of existing overhead utility lines to underground. Part A of Rule 20 required local electric utilities to fund the conversion of overhead electric lines that meet the criteria of focusing on high traffic densities and tourism areas. However, the CPUC Decision 21-06-013 discontinued the allocation of new Rule 20A work credits (funding) after December 31, 2022.

Council Policy 600-08

In 2002, the CPUC approved an additional mechanism (CPUC Energy Division Resolution E-3788) for funding and executing undergrounding work within the City jurisdiction to improve public safety, community character, and visual quality. A Surcharge Fund was established by applying an underground surcharge component to residents' electric bills, managed separately from the City's General Fund. The surcharge program also funds street resurfacing, curb ramps, streetlights, and street trees within each undergrounding project boundary. Council Policy 600-08 was established to guide the management of funds and execution of projects under this new funding mechanism. In addition, Chapter 06, Article 01, Division 05 of the SDMC includes details on the undergrounding process, including interaction with the City Council, responsibilities to residents, and overall undergrounding requirements and definitions. Since the termination of the Rule 20A program, the surcharge program is now the only funding mechanism for implementing undergrounding projects.

California Environmental Quality Act

The California Environmental Quality Act (CEQA) requires that project proponents assess potential land use impacts, including project consistency with local land use policies and plans. Consistency with local land use policies and plans is one of several criteria that can be used to assess whether a

project could have significant environmental impacts under the provisions of CEQA. A discussion of local land use policies and plans and standards of significance for potential land use impacts are described below.

California Coastal Act

The California Coastal Commission was established by the state legislature through adoption of the California Coastal Act of 1976 (PRC Section 30000 et seq.). The intent of the California Coastal Act is to protect, maintain, and, where feasible, enhance and restore the overall quality of the coastal zone environment. The California Coastal Act includes specific policies that address issues such as shoreline and upland public access and recreation, terrestrial and marine habitat protection, visual resources, water quality, public works, and land/water uses.

Local

City of San Diego General Plan

The City's General Plan was unanimously adopted by the City Council on March 10, 2008, and was subsequently amended in 2010, in 2012, 2015, 2018, 2021, 2022, and most recently in July 2024 (also referred to as Blueprint SD). The General Plan consists of the following elements: Land Use and Community Planning; Mobility; Urban Design; Economic Prosperity; Public Facilities, Services, and Safety; Recreation; Conservation; Noise; Historic Preservation; and Environmental Justice (City of San Diego 2024). A discussion of elements that are particularly relevant to an analysis of potential land use impacts related to the Project is provided below.

Land Use and Community Planning Element

The purpose of the Land Use and Community Planning Element is to "guide future growth and development into a sustainable citywide development pattern," while maintaining or enhancing quality of life in the City's communities (City of San Diego 2024). The Land Use and Community Planning Element addresses land use issues that apply to the City as a whole. The element provides policy direction that may affect Project implementation in areas including zoning and policy consistency, the plan amendment process, coastal planning, airport land use compatibility planning, annexation policies, balanced communities, equitable development, and environmental justice.

Goals and policies of the Land Use and Community Planning Element applicable to the Project include the following:

Goal. Zones or development regulations to better implement updated community plans.

LU-F.2. Review public and private projects to ensure that they do not adversely affect the General Plan and community plans. Evaluate whether proposed projects implement specified land use,

density/intensity, design guidelines, and other General Plan and community plan policies including open space preservation, community identity, mobility, and public facilities.

Goal. A just and equitable society through inclusive public outreach and participation in the planning process.

LU-H.1. Promote development of balanced communities that take into account community-wide involvement, participation, and needs.

b. Invest strategically in public infrastructure and offer development incentives that are consistent with the neighborhood's vision.

d. Ensure that neighborhood development and redevelopment addresses the needs of older people, particularly those disadvantaged by age, disability, or poverty.

Mobility Element

The purpose of the Mobility Element is to "achieve a balanced, multimodal transportation system that allows people to move around safely, conveniently, and enjoyably while minimizing environmental and neighborhood impacts" (City of San Diego 2024).

Policies of the Mobility Element applicable to the Project include the following:

ME-A.1. Design and operate sidewalks, streets, and intersections to emphasize pedestrian safety and comfort through a variety of street design and traffic management solutions, including but not limited to those described in the Pedestrian Improvements Toolbox, Table ME-1.

ME-A.5. Provide adequate sidewalk widths and clear path of travel as determined by street classification, adjoining land uses, and expected pedestrian usage.

a. Minimize obstructions and barriers that inhibit pedestrian circulation.

b. Consider pedestrian impacts when designing the width and number of driveways within a street segment.

ME-E.12. Preserve and protect scenic vistas along streets.

a. Identify state highways where the City desires to preserve scenic qualities and work with Caltrans to pursue official scenic highway designation.

b. Designate scenic routes along City streets to showcase scenic vistas and to link points of visitor interest.

c. Adopt measures to protect aesthetic qualities within scenic highways and routes.

Urban Design Element

The purpose of the Urban Design Element is to "address urban form and design" and to guide physical development toward a desired scale and character that is "consistent with the social, economic, aesthetic, and equity values of the City" (City of San Diego 2024).

Project implementation must be consistent with design standards such as the following:

UD-A.4. Use sustainable building methods in accordance with the sustainable development policies in the Conservation Element.

UD-A.9. Respect the context of historic streets, landmarks, and areas that give a community a sense of place or history. A survey may be done to identify "conservation areas" that retain original community character in sufficient quantity and quality but typically do not meet designation criteria as an individual historical resource or as a contributor to a historical district.

a. Create objective design criteria to be used for new development, so that a neighborhood's historic character is complemented within the conservation areas where appropriate (see also Historical Preservation Element, Policy HP-A.2).
b. Review the redevelopment of property within conservation areas to maintain important aspects of the surviving community character that have been identified as characteristics of a neighborhood that could be preserved.

UD-A.17: Minimize the visual impact of wireless facilities.

a. Conceal wireless facilities in existing structures when possible, otherwise use camouflage and screening techniques to hide or blend them into the surrounding area.
b. Design facilities to be aesthetically pleasing and respectful of the neighborhood context.
c. Conceal mechanical equipment and devices associated with wireless facilities in underground vaults or unobtrusive structures.

UD-A.18. Minimize the visual and functional impact of utility systems and equipment on streets, sidewalks, and the public realm.

a. Convert overhead utility wires and poles, and overhead structures such as those associated with supplying electric, communication, community antenna television, or similar service to underground.
b. Design and locate public and private utility infrastructure, such as phone, cable and communications boxes, transformers, meters, fuel ports, back-flow preventors, ventilation

grilles, grease interceptors, irrigation valves, and any similar elements, to be integrated into adjacent development and as inconspicuous as possible. To minimize obstructions, elements in the sidewalk and public right of way should be located in below grade vaults or building recesses that do not encroach on the right of way (to the maximum extent permitted by codes). If located in a landscaped setback, they should be as far from the sidewalk as possible, clustered and integrated into the landscape design, and screened from public view with plant and/or fencelike elements.

c. Traffic operational features such as streetlights, traffic signals, control boxes, street signs and similar facilities should be located and consolidated on poles, to minimize clutter, improve safety, and maximize public pedestrian access, especially at intersections and sidewalk ramps. Other street utilities such as storm drains and vaults should be carefully located to afford proper placement of the vertical elements.

UD-C.5. Design or retrofit streets to improve walkability, strengthen connectivity, and enhance community identity.

a. Design or retrofit street systems to achieve high levels of connectivity within the neighborhood street network that link individual subdivisions/projects to each other and the community.

b. Avoid closed loop subdivisions and extensive cul-de-sac systems, except where the street layout is dictated by the topography or the need to avoid sensitive environmental resources.

c. Design open ended cul-de-sacs to accommodate visibility and pedestrian connectivity, when development of cul-de-sacs is necessary.

d. Emphasize the provision of high quality pedestrian and bikeway connections to transit stops/stations, village centers, and local schools.

e. Design new streets and consider traffic calming where necessary, to reduce neighborhood speeding (see also Mobility Element).

f. Enhance community gateways to demonstrate neighborhood pride and delineate boundaries.

g. Clarify neighborhood roadway intersections through the use of special paving and landscape.

h. Develop a hierarchy of walkways that delineate village pathways and link to regional trails.

i. Discourage use of walls, gates and other barriers that separate residential neighborhoods from the surrounding community and commercial areas.

j. Encourage design features that integrate new development into the surrounding community.

Economic Prosperity Element

The policies in the Economic Prosperity Element are "intended to improve economic prosperity by ensuring that the economy grows in ways that strengthen our industries, retain and create good jobs with self-sufficient wages, increase average income, and stimulate economic investment in our communities" (City of San Diego 2024). There are no goals or policies related to the Economic Prosperity Element applicable to the Project.

Noise Element

The purpose of the Noise Element is to "protect people living and working in the City of San Diego from excessive noise." Noise at excessive levels can be "intrusive, annoying, and undesirable"; therefore, the City provides goals to control noise at its source to acceptable levels and to "guide compatible land uses and the incorporation of noise attenuation measures for new uses" (City of San Diego 2024).

The following Noise Element policies applicable to the Project address construction hours of operation and noise nuisances:

NE-G.1. Implement limits on the hours of operation for non-emergency construction and refuse vehicle and parking lot sweeper activity in residential areas and areas abutting residential areas.

NE-G.2. Implement limits on excessive public noises that a person could reasonably consider disturbing and/or annoying in residential areas and areas abutting residential areas.

Public Facilities, Services, and Safety Element

The Public Facilities, Services, and Safety Element addresses the City's "network of public spaces and facilities that provide important services to the City. … These facilities include those owned and managed by the City, such as police and fire facilities, parks and recreational spaces, libraries, stormwater and wastewater infrastructure, information infrastructure, disaster preparedness and infrastructure related to seismic safety" (City of San Diego 2024). Although managed by organizations other than the City, "regulated Public Utilities, Regional Facilities, and Healthcare Facilities are also included, as they too affect land uses and public health and safety. The Public Facilities Element also provides policies for public facilities financing, prioritization, developer, and City funding responsibilities" (City of San Diego 2024). Public Facilities, Services, and Safety Element goals and policies are associated with providing adequate public facilities and services to serve the existing population and new growth.

Policies of the Public Facilities, Services, and Safety Element applicable to the Project include the following:

PF-A.1. Plan for infrastructure and public spaces that are models of environmental, economic, and social stewardship and that serve as examples for private development.

PF-A.3. Consider the potential impacts of changing demographics, conditions and other events – such as climate change, technological changes, and natural and manmade disasters – to ensure resilient infrastructure and public spaces.

Fire Rescue Goal 1. Protection of life, property, and environment by delivering the highest level of emergency and fire-rescue services, hazard prevention, and safety education.

Fire Rescue Goal 2. Minimize fire hazards resulting from structural or wildland fires.

PF-G.5. Identify and implement BMPs for projects that repair, replace, extend or otherwise affect the storm water conveyance system. These projects should also include design considerations for maintenance, inspection, and, as applicable, water quality monitoring.

PF-I.2. Maximize waste reduction and diversion.

f. Reduce and recycle Construction and Demolition debris.

g. Strive for recycling of 100 percent of inert Construction and Demolition materials and a minimum of 50 percent by weight of all other material.

PF-L.2. Coordinate with all agencies and programmed project schedules to minimize disruptions to community members and public rights-of-way, and incorporate information infrastructure needs and opportunities.

PF-M.1. Ensure that public utilities are provided, maintained, and operated in a cost-effective manner that protects community members and enhances the environment.

PF-M.2. Coordinate with all public and private utilities to focus utility capital investments and design projects to help implement the City of Villages strategy.

PF-M.3. Integrate the design and siting of safe and efficient public utilities and associated facilities into the early stages of the long-range planning and development process, especially in redevelopment/urban areas where land constraints exist.

PF-P.13. As part of the community plan update process, update plans and zoning to limit future development in hazard areas.

PF-P.16. Continue to address the effects of climate change and implement the strategies within Climate Resilient SD, a comprehensive climate adaptation and resilience plan that integrates and builds upon the applicable strategies identified in the General Plan and Climate Action Plan.

PF-P.17. Monitor climate change-related impacts with local, regional, state, federal, and/or local tribal partners to provide information about the effectiveness of existing infrastructure and programs.

Recreation Element

The purpose of the Recreation Element is "to preserve, protect, acquire, develop, operate, maintain, and enhance public recreation opportunities and facilities throughout the City for all users" (City of San Diego 2024). With over 42,000 acres of park and open space, the City's millions of residents and visitors benefit both mentally and physically from these recreational facilities. This element provides policies to address the City's goals for recreation facilities.

The following Recreation Element goal is applicable to the Project:

RE-C.2. Protect, manage and enhance parks and open space lands through appropriate means which include sensitive planning, park and open space dedications, and physical protective devices.

RE-C.10. Develop strategies that adapt public rights-of-way that support recreation, walkability/rollability, sociability, bikeability, and health while reducing vehicular congestion and emissions.

RE-F.2. Protect and enhance park lands from adjacent incompatible uses and encroachments.

Conservation Element

The overarching purpose of the Conservation Element is to "provide for the long-term conservation and sustainable management of the rich natural resources that help define the City's identity, contribute to its economy, and improve its quality of life" (City of San Diego 2024).

Goals of the Conservation Element applicable to the Project include the following:

CE-G.1. Preserve natural habitats pursuant to the MSCP and VPHCP, preserve rare plants and animals to the maximum extent practicable, and manage all City-owned native habitats to ensure their long-term biological viability.

a. Educate the public about the impacts invasive plants have on open space.
b. Remove, avoid, or discourage the planting of invasive plants.

c. Pursue funding for removal of established populations of invasive plants within the MHPA and open space.

Historical Preservation Element

The purpose of the Historic Preservation Element is to "guide the preservation, protection, restoration, and rehabilitation of historical and cultural resources and maintain a sense of the City." This element provides the "identification, evaluation, registration, and protection" of historical resources, for its current and future residents (City of San Diego 2024).

Applicable goals of the Historical Preservation Element include the following:

HP-A.2. Fully integrate the consideration of historical and cultural resources in the larger land use planning process.

a. Promote early conflict resolution between the preservation of historical resources and alternative land uses.

b. Encourage the consideration of historical and cultural resources early in the development review process by promoting the preliminary review process and early consultation with property owners, community and historic preservation groups, land developers, Native Americans, and the building industry.

c. Include historic preservation concepts and identification of historic buildings, structures, objects, sites, neighborhoods, and non-residential historical resources in the community plan update process.

d. Conservation areas that are identified at the community plan level, based on historical resources surveys, may be used as an urban design tool to complement community character (see also Urban Design Element, Policy UD-A.7).

e. Make the results of historical and cultural resources planning efforts available to planning agencies, the public and other interested parties to the extent legally permissible.

Environmental Justice Element

The Environmental Justice Element "focuses on reducing pollution exposure, improving air quality, and promoting public facilities, food access, safe and healthy homes, and physical activity." This element aims to ensure that "people of all races, cultures, and incomes are equally and equitably valued, protected, and served … [and] includes policies and regulations that affect the quality of the environment, such as mobility, parks, open space, public space, public services, and use of land" (City of San Diego 2024).

Goals and policies of the Environmental Justice Element applicable to the Project include the following:

Climate Change and Resilience Goal. Reduce exposure to climate change and increase climate resilience.

EJ-B.1. Encourage the use of noise-reducing materials and construction techniques in sensitive receptor development to ensure peaceful and healthy living environments and ensure compatibility between land uses (see Noise Element).

Community Plans

In addition to the General Plan, there are 37 Community Plans, 15 Local Coastal Program Land Use Plans, and 6 Park Master Plans for the City that are relevant to the Project. The Project does not include undergrounding projects within the Carmel Mountain Ranch Community Plan area.

The applicable Community Plans are as follows:

- Black Mountain Ranch
- Carmel Valley
- Clairemont Mesa
- College Area
- Del Mar Mesa
- Downtown
- East Elliott
- Encanto Neighborhoods
- Fairbanks Ranch Country Club
- Golden Hill
- Kearny Mesa
- Linda Vista
- Mid-City Communities: Normal Heights, Kensington-Talmadge, City Heights, and Eastern Area
- Midway-Pacific Highway
- Mira Mesa
- Miramar Ranch North
- Mission Valley
- Navajo
- North Park
- Old Town San Diego
- Otay Mesa
- Pacific Highlands Ranch
- Rancho Bernardo
- Rancho Encantada
- Rancho Peñasquitos
- Sabre Springs
- San Pasqual Valley
- Scripps Miramar Ranch
- Serra Mesa
- Skyline-Paradise Hills
- Southeastern San Diego
- Tierrasanta
- Torrey Highlands

- Torrey Hills
- University
- Uptown
- Via De La Valle

The applicable Local Coastal Program Land Use Plans are as follows:

- Barrio Logan
- La Jolla
- Mission Beach
- North City Future Urbanizing Area (NCFUA) Framework Plan (San Dieguito)
- Ocean Beach
- Midway-Pacific Highway
- Mira Mesa
- University
- Torrey Hills
- Otay Mesa–Nestor
- Pacific Beach
- Peninsula
- San Ysidro
- Tijuana River Valley
- Torrey Pines

The applicable Park Master Plans are as follows:

- Balboa Park Master Plan
- Los Peñasquitos Canyon Preserve Master Plan
- Mission Bay Park Master Plan
- Parks Master Plan
- San Diego River Park Master Plan
- Sunset Cliffs Natural Park Master Plan

Community Plans

The Project would include construction activities within various communities within the City. As such, the Project would be required to comply with applicable goals and policies of the Community Plans the Project would be located within. Descriptions of the Community Plans the Project would be located within are included below, and relevant goals and policies are included in Table 4.5-1.

Black Mountain Ranch Subarea Plan

The Black Mountain Ranch community is located in an area of the City previously referred to as the NCFUA. Black Mountain Ranch encompasses approximately 5,100 acres and is located west of 4-S

Ranch and Rancho Peñasquitos, south of the Santa Fe Valley, east of Fairbanks Ranch and Rancho Santa Fe Farms, and north of Torrey Highlands. Camino Ruiz and Camino del Norte provide the primary access for the community (City of San Diego 2020a).

Carmel Valley Community Plan

The Carmel Valley community is nestled between Pacific Highlands Ranch to the north, Los Peñasquitos Canyon Preserve to the east, Sorrento Valley to the south, and Torrey Pines State Preserve to the west. Recreational options include many neighborhood parks, a community recreation center, athletic clubs, golf, and the nearby beaches at Torrey Pines and Del Mar. An early experimenter in smart growth, Carmel Valley includes open space areas and an extensive trail system (City of San Diego 1975).

Clairemont Mesa Community Plan

Clairemont Mesa community encompasses 6,755 acres in the north-central portion of the City. "Clairemont Mesa is an urbanized residential community with several shopping centers, parks and recreational facilities and educational opportunities. The community has well-established single-family neighborhoods with streetscape parkways" (City of San Diego 2019a).

College Area Community Plan

The College Area community consists of approximately 1,950 acres and is "located in the central part of the City of San Diego, along the southern rim of Mission Valley and approximately eight miles northeast of the downtown area. It is a residential community" and is also home to San Diego State University (City of San Diego 2019a).

Del Mar Mesa Specific Plan

The Del Mar Mesa community consists of approximately 2,042 acres located east of Carmel Valley and north of Los Peñasquitos Canyon approximately 4 miles from the coast. Del Mar Mesa has developed as a semi-rural community of large homes, a golf course, and a resort hotel consistent with existing agricultural zoning and Proposition A Lands as shown in the General Plan (City of San Diego 2000a).

Downtown Community Plan

Downtown San Diego encompasses eight different neighborhoods: Gaslamp, East Village, Columbia, Marina, Cortez, Little Italy, Horton Plaza, and Core. These neighborhoods are the heart of the business, arts, and entertainment communities. Downtown San Diego is an urbanized community that encompasses approximately 1,450 acres and primarily consists of residential and commercial uses (City of San Diego 2013a).

East Elliot Community Plan

East Elliott is a portion of former Camp Elliott, purchased by the U.S. government in 1941 for use as a Marine Corps training camp. The East Elliot planning area consists of approximately 2,745 acres in the eastern portion of the City. In 1961, approximately half of Camp Elliott, including present-day East Elliott, Tierrasanta, and a portion of Mission Trails Regional Park, was declared surplus and sold. East Elliott remains undeveloped, with the only uses being the Sycamore Landfill and a few telecommunication antennas. It is dominated by native vegetation, including sage scrub, chaparral, native grassland, and oak and sycamore woodland. It constitutes one of the largest and biologically most important remaining open space areas in San Diego with a number of endangered and threatened wildlife species (City of San Diego 2015b).

Encanto Neighborhoods Community Plan

The eight communities that make up the Encanto Neighborhoods community planning area are Emerald Hills, Chollas View, Lincoln Park, Valencia Park, Alta Vista, O'Farrell, Broadway Heights, and Encanto. Encanto has maintained much of its semi-rural character, but the other seven neighborhoods, which make up roughly 75% of the population (47,000) and 85% of the land mass (3,811 acres), are largely suburban. Three-quarters of homes are single-family homes (City of San Diego 2015a).

Fairbanks Ranch Country Club Community Plan

Fairbanks Ranch Country Club consists of approximately 785 acres within the northwest portion of the City. The community is located within the San Dieguito River Valley, which extends through the community toward the Pacific Ocean. The natural land characteristics of the community include the floodplain and adjacent slopes of the valley, and the San Dieguito River, which bisects the community. Through the implementation of sensitive design and open space land uses, the community has retained its rural and open space character (City of San Diego 1982c).

Golden Hill Community Plan

The Golden Hill community planning area is an urbanized community consisting of approximately 746 acres, located east of Downtown San Diego and adjacent to Balboa Park. The community has a long-standing development history within the region and encompasses the historic Golden Hill and South Park neighborhoods as well as several adjacent areas such as Choate's addition and Brooklyn Heights. The community is bounded by Balboa Park and Juniper Street to the north, 34th Street Canyon and State Route (SR) 15 on the east, SR-94 on the south, and Interstate (I) 5 to the west (City of San Diego 2016a).

Kearny Mesa Community Plan

The Kearny Mesa community comprises approximately 4,000 acres. The planning area is located between SR-52, I-805, and I-15. The planning area is a major industrial and commercial center occupying a central location in the City, and the community meets employment, business, and retail needs for a large portion of the City (City of San Diego 2020).

Linda Vista Community Plan

The Linda Vista community comprises about 2,400 acres generally bounded by Friars Road on the south, by I-5 on the west, by Tecolote Canyon and Mesa College Drive on the north, and by SR-163 on the east (City of San Diego 2019b).

Mid-City Communities Plan: Normal Heights, Kensington–Talmadge, City Heights, and Eastern Area Communities Plan

"Mid-City is a cluster of four communities: Normal Heights, Kensington-Talmadge, City Heights, and Eastern Area, each with its own distinctive character and its own community planning group. Probably the bond that ties these communities together the strongest is El Cajon Boulevard—Old Highway 80—which in earlier days tied the region to points east" (City of San Diego 2015b).

Midway-Pacific Highway Community Plan and Local Coastal Program

The Midway-Pacific Highway community (formerly known as Midway/Pacific Highway Corridor) is an urbanized community situated north of Downtown between Old Town and Point Loma. Midway-Pacific Highway encompasses approximately 800 acres of mostly flat land and consists of three main areas: the central Midway area, the Pacific Highway corridor, and the U.S. Marine Corps Recruit Depot. The area is characterized by wide streets, flat topography, and a varied mixture of auto-oriented large and small commercial developments (City of San Diego 2018a).

Mira Mesa Community Plan and Local Coastal Program

The Mira Mesa community is approximately 10,500 acres and is located in the north-central portion of the City. It is bounded on the north by Los Peñasquitos Canyon, on the west by I-805, on the east by I-15, and on the south by Miramar Road (City of San Diego 2022a). The North City Local Coastal Program Land Use plan includes approximately 2,300 acres in Western Mira Mesa are included within the watershed of the Los Peñasquitos Lagoon.

Miramar Ranch North Community Plan

The Miramar Ranch North community is located in the north-central portion of the City, situated north of Miramar Reservoir, immediately east of Mira Mesa and Rancho Bernardo. The Miramar

Ranch North community encompasses approximately 1,842 acres and is one of two communities that make up the Scripps Ranch community, which was established in the 1890s. Scripps Ranch is also home to some of the City's most scenic parks, beautiful community facilities, landscaped neighborhoods, and business centers (City of San Diego 2016b).

Mission Valley Community Plan

The Mission Valley community planning area comprises approximately 2,418 acres and is located near the geographic center of the City. Part of the San Diego River floodplain, it is generally bounded by Friars Road and the northern slopes of the valley on the north, the eastern banks of the San Diego River on the east, the southern slopes of the valley on the south, and I-5 on the west (City of San Diego 2019b).

Navajo Community Plan

The Navajo community, encompassing approximately 14 square miles, lies roughly north of I-8, northwest of the City of La Mesa, west of the Cities of El Cajon and Santee, and southeast of the San Diego River. The community includes the neighborhoods of Grantville, Allied Gardens, Del Cerro, and San Carlos (City of San Diego 2015c).

North Park Community Plan

The North Park community encompasses approximately 2,258 acres located in the central portion of the City and is bordered by the communities of Uptown on the west, Mission Valley on the north, the Mid-City communities of Normal Heights and City Heights on the east, and Golden Hill to the south. Balboa Park abuts the community on the southwest (City of San Diego 2020c).

Old Town San Diego Community Plan

The Old Town San Diego community is known as the birthplace of the State of California and of the City of San Diego. The community is approximately 230 acres in size and is located south of I-8 and Mission Valley, east of I-5 and the Midway-Pacific Highway community, and west of the Mission Hills neighborhood of the Uptown community (City of San Diego 2018b).

Otay Mesa Community Plan

The Otay Mesa community planning area is bounded by the Otay River Valley and the City of Chula Vista on the north, the international border with Mexico on the south, I-805 on the west, and the County of San Diego on the east. Otay Mesa is envisioned as a major employment center with two new residential village areas and public trails that traverse the canyons and mesas (City of San Diego 2017a).

Pacific Highlands Ranch Subarea Plan

"Pacific Highlands Ranch is generally located in the northwestern portion of the NCFUA and encompasses approximately 2,652 acres of predominantly undeveloped land. Pacific Highlands Ranch is bounded by the community of Fairbanks Ranch on the north, Torrey Highlands (Subarea IV) to the east, Del Mar Mesa (Subarea V) to the south, and the community of Carmel Valley to the west" (City of San Diego 2004a).

Rancho Bernardo Community Plan

"Rancho Bernardo is the northernmost residential community within the City of San Diego. … The community planning area encompasses about 6,511 gross acres." Rancho Bernardo is a master-planned community that includes private parks and clubs for each neighborhood in the community (City of San Diego 2016c).

Rancho Encantada Precise Plan

The Rancho Encantada community is located east of Scripps Ranch, north of the Marine Corps Air Station Miramar, west of the Goodan Ranch/Sycamore Canyon County Open Space Preserve, and south of the City of Poway. The community encompasses approximately 2,658 acres (City of San Diego 2001a).

Rancho Peñasquitos Community Plan

The Rancho Peñasquitos community is located west of I-15, north of Los Peñasquitos Canyon Preserve, south of the community of Rancho Bernardo, and east of the Torrey Highlands Community. SR-56 traverses the central portion of the community from east to west. Rancho Peñasquitos encompasses approximately 6,500 acres, including Black Mountain Regional Park (City of San Diego 2021c).

Sabre Springs Community Plan

Situated in foothills north of Scripps Ranch and south of Carmel Mountain Ranch, Sabre Springs is home to quiet neighborhoods, rolling hills, business parks, and City facilities. On the eastern edge of the Los Peñasquitos Canyon Preserve and north of Miramar Reservoir, Sabre Springs offers many recreational opportunities to provide residents (City of San Diego 1998b).

San Pasqual Valley Plan

The San Pasqual Valley plan area includes approximately 14,000 acres and is largely owned by the City of San Diego Public Utilities Department. Agricultural land uses dominate the valley's landscape and include various orchards, vine crops, field crops, dairy operations, and pasture lands. The valley

is in the northern-most portion of the City and is bounded on the north by City of Escondido, on the east and west by unincorporated land within San Diego County, and on the south by the City of Poway and the Rancho Bernardo community planning area (City of San Diego 2005d).

Scripps Miramar Ranch Community Plan

Scripps Miramar Ranch is one of two communities that make up the Scripps Ranch community, which was established in the 1890s. The Scripps Miramar Ranch community is located in the northern-central portion of the City and encompasses approximately 4,365 acres. The community surrounds Miramar Reservoir and is bordered by Miramar Ranch North and Sabre Springs communities to the north, unplanned future urbanizing area to the east, Miramar Naval Air Station to the south, and I-15 to the west (City of San Diego 2018d).

Serra Mesa Community Plan

The Serra Mesa community developed in the years after World War II with military multifamily housing and later single-family homes, apartments, and support retail. Most of the community and its 8,361 dwelling units had been built by 1970. The community also includes a health-institutional complex anchored by Sharp and Children's hospitals and is further characterized by north–south oriented canyons that drain into Mission Valley to the south (City of San Diego 2017a).

Skyline–Paradise Hills Community Plan

The Skyline–Paradise Hills community is approximately 4,500 acres and is located in the southeastern portion of the City. The community is bordered by the City of Lemon Grove and the Southeastern San Diego community planning area to the north, the South Bay Freeway (SR-54) and an unincorporated area of San Diego County to the south, National City and the Southeastern San Diego community planning area to the west, and an unincorporated area of San Diego County to the east. This community includes the neighborhoods of Skyline, Paradise Hills, South Bay Terraces, North Bay Terraces, Lomita, and Jamacha (City of San Diego 2009e).

Southeastern San Diego Community Plan

"Southeastern San Diego is a vibrant, diverse community located just east of Downtown San Diego. … The Planning Area encompasses 3,051 acres … [and] lies south of State Route 94 (SR-94), between Interstate 5 (I-5) and Interstate 805 (I-805), and north of the city limits of National City. Neighborhoods contained in Southeastern San Diego include Sherman Heights, Grant Hill, Stockton, Mt. Hope, Logan Heights, Mountain View, Southcrest, and Shelltown" (City of San Diego 2015d).

Tierrasanta Community Plan

The Tierrasanta community, encompassing approximately 11 square miles, lies roughly northwest of the San Diego River, north of Friars Road, south of SR-52, and east of I-15. The residential development of Tierrasanta began in 1960 when the federal government declared a portion of Camp Elliott, a Marine Corps training camp, as surplus (City of San Diego 2011f).

Torrey Highlands Subarea Plan

The Torrey Highlands community is located in an area of the City still referred to as the NCFUA. Torrey Highlands encompasses approximately 1,134 acres and is west of Rancho Peñasquitos, south of Black Mountain Ranch, east of Pacific Highlands Ranch, and north of Del Mar Mesa. SR-56 traverses the community (City of San Diego 2019f).

Torrey Hills Community Plan and Local Coastal Program

The Torrey Hills community planning area is approximately 784 acres and is located in the northern region of the City. The community is bounded by I-5 to the west, the Carmel Valley community to the north and east, and the Los Peñasquitos Canyon Preserve and Mira Mesa community to the south (City of San Diego 2011b). The North City Local Coastal Program Land Use plan includes the Northern Portion and the South Perimeter of the Torrey Hills Plan Area, and have approximately 123 acres that are included within the Coastal Zone.

University Community Plan

"The University community planning area encompasses approximately 8,700 acres. … [T]he area is bounded by Los Peñasquitos Lagoon and the toe of the east-facing slopes of Sorrento Valley on the north, the tracks of the Atchison, Topeka, and Santa Fe Railroad, MCAS [Marine Corps Air Station] Miramar and Interstate 805 (I-805) on the east, State Route 52 (SR-52) on the south, and Interstate 5 (I-5), Gilman Drive, North Torrey Pines Road, La Jolla Farms and the Pacific Ocean on the west" (City of San Diego 2024cc).

Uptown Community Plan

The Uptown community planning area is located "just north of Downtown. It is bounded on the north by the steep hillsides of Mission Valley, on the east by Park Boulevard and Balboa Park, and on the west and south by Old Town San Diego and Interstate 5. Uptown comprises about 2,700 acres or approximately 4.2 square miles." The Uptown community is located on a level mesa that is broken by heavily vegetated canyons and borders two major parks: Presidio Park and Balboa Park (City of San Diego 2024d).

Via De La Valle Community Plan

The Via De La Valle community is located at the northern boundary of the City and encompasses approximately 124 acres. The community is designated Planned Urbanizing, which indicates that the community plan area is "capable of providing essential public facilities and meeting the physical, social and economic goals for the City" (City of San Diego 1996b).

Local Coastal Program Land Use Plans

Barrio Logan Community Plan and Local Coastal Program

The Barrio Logan community planning area is "positioned between Downtown San Diego to the north, Interstate 5 to the east, as well as the Unified Port of San Diego and United States Naval Base San Diego along San Diego Bay to the west, and National City to the south. … Barrio Logan comprises approximately 1,000 acres. The Port of San Diego and Naval Base San Diego comprise approximately half of the land area contained within the community planning area" (City of San Diego 2023).

La Jolla Community Plan and Local Coastal Program Land Use Plan

"The La Jolla community planning area consists of approximately 5,718 acres … and is located along the western edge of the north coastal region of the City of San Diego. It is bounded on the north by the University of California, San Diego and a portion of the University community, on the east by Gilman Drive, the University community, and Interstate 5; on the south by the community of Pacific Beach and on the west by the Pacific Ocean." The northernmost portion of La Jolla is separated from the remainder of the community by the Scripps Institute of Oceanography and a portion of the University of California, San Diego (City of San Diego 2014c).

Mission Beach Precise Plan and Local Coastal Program Addendum

The Mission Beach community is the most densely developed community and one of the most expensive communities within the City. The community is located along a peninsula approximately 2 miles long and consists of approximately 119 acres (City of San Diego 2017d).

North City Future Urbanizing Area Framework Plan (San Dieguito)

The NCFUA Subarea II (San Dieguito) is located north of the Carmel Valley community between I-5 and Fairbanks Country Club. The natural resources and landforms that compose the San Dieguito River Valley are the prominent features of this planning area. Most uses within this portion of the river valley are related to agriculture or recreation. A large portion of the valley has been acquired as open space by the City of San Diego Multiple Species Conservation Program (MSCP) and the San Dieguito River Park Joint Powers Authority (City of San Diego 2014d).

North City Local Coastal Program Land Use Plan

All of the following Community Plans have adopted the North City Local Coastal Program (LCP):

- Midway-Pacific Community Plan: portions of the Pacific Highway Corridor are within Coastal Zone.
- Mira Mesa Community Plan: portions of the Mira Mesa Community are within the Coastal Zone. The North City LCP also includes that 2,300 acres in Western Mira Mesa are within the Watershed of Los Peñasquitos Lagoon.
- Torrey Hills Community Plan: the Northern Portion and the South Perimeter of the Torrey Hills Plan Area, approximately 123 acres are included within the Coastal Zone.
- University Community Plan: portions of the University Community including The Torrey Pines State Reserve, Torrey Pines Golf Course, part of UC San Diego and some sections of the Scientific Research and Open Space land uses are located within the Coastal Zone.

Ocean Beach Community Plan and Local Coastal Program

The Ocean Beach community is bounded on the north by the San Diego River, on the west by the Pacific Ocean, on the east by Froude Street and West Point Loma Boulevard, and on the south by Adair Street. The community planning area is approximately 642 acres (City of San Diego 2015e).

Otay Mesa–Nestor Community Plan and Local Coastal Program

The Otay Mesa–Nestor community planning area is located in the southern region of the City and is bounded on the north by the City of Chula Vista, on the east by the community of Otay Mesa, on the south by the Tijuana River Valley and the San Ysidro communities, and on the west by the City of Imperial Beach (City of San Diego 2024d).

Pacific Beach Community Plan and Local Coastal Program Land Use Plan

The Pacific Beach community planning area is located along the western edge of "the mid-coastal region of the City of San Diego. It is bounded on the north by La Jolla, on the east by Interstate 5 and Clairemont Mesa, on the south by Mission Bay Park and Mission Beach, and on the west by the Pacific Ocean" (City of San Diego 2019c).

Peninsula Community Plan and Local Coastal Program Land Use Plan

"The Peninsula community planning area encompasses about 4,409 acres of land bounded by Ocean Beach and the Pacific Ocean on the west and south, the San Diego River Flood Control Channel and the Midway-Pacific Highway community on the north, and San Diego Bay and Port tidelands on the east. The area occupies a major geographic feature of San Diego's coastline known as Point Loma.

Point Loma is a large longitudinal hill projecting into the Pacific Ocean from the north end of San Diego Bay, and as such is a major protective feature of the harbor" (City of San Diego 2011.

San Ysidro Community Plan and Local Coastal Program Land Use Plan

The San Ysidro community planning area encompasses approximately 1,800 acres. It is bounded by the Otay Mesa–Nestor community and SR-905 in the north, by the Tijuana River Valley in the west, by the Otay Mesa community in the east, and by the international border with Mexico in the south (City of San Diego 2017b).

Tijuana River Valley Local Coastal Program Land Use Plan

"The Tijuana River Valley is a broad natural floodplain containing a variety of wetland and riparian areas. This valley is a small portion of the Tijuana River's 1,700 square miles of watershed. The watershed area includes portions of south San Diego County and northern Baja California, Mexico." The Tijuana River Valley community planning area is bounded by the City of Imperial Beach and the Otay Mesa–Nestor community to the north, the San Ysidro community to the east, Mexico to the south, and Border Field State Park and Imperial Beach to the west (City of San Diego 1999c).

Torrey Pines Community Plan and Local Coastal Program

Torrey Pines is in the northern coastal region of the City and is bounded by I-5 on the east, the City of Del Mar and the Pacific Ocean to the west, the City of Solana Beach to the north, and the University community to the south. The Torrey Pines community planning area encompasses approximately 2,600 acres (City of San Diego 2014e).

Park Plans

Balboa Park Master Plan

The *Balboa Park Master Plan* has one underlying vision, which is "to nurture and enhance the cultural, recreational, and passive resources of the park to meet the needs of the region and surrounding community, while respecting its physical, cultural, and historical environment" (City of San Diego 2004). The goals and policies of the *Balboa Park Master Plan* were reviewed, and none were found to be particularly applicable to the proposed Project. The goals of the *Balboa Park Master Plan* are primarily geared toward preserving cultural and recreational uses, increasing free and open parkland, and improving public access.

Los Peñasquitos Canyon Preserve Master Plan

"Los Peñasquitos Canyon Preserve is located in the City of San Diego between the I-5 and I-15 freeways, some twelve miles north from the City's urban center. … The Los Peñasquitos Canyon and

its tributary, Lopez Canyon, are characterized by perennial streams and steep slopes rising from flat, densely vegetated canyon bottoms." The *Los Peñasquitos Canyon Preserve Master Plan* includes a Long-Range Management Plan but does not include specific goals and policies (City of San Diego 1998; County of San Diego 1998).

Mission Bay Park Master Plan

The Mission Bay Park is located in the western portion of the City and encompasses approximately 4,235 acres. Mission Bay Park provides recreational activities to residents and tourists and is one of the largest aquatic parks in the world. The purpose of the *Mission Bay Park Master Plan* update is to "identify [the] new demands" of the park and "protect and enhance the Bay's environment for future generations" (City of San Diego 2021c).

Parks Master Plan

The *Parks Master Plan* was adopted in August 2021 as an amendment to the Recreation Element of the City's General Plan. The purpose of the *Parks Master Plan* is to make the City's existing parks system more accessible, equitable, and biologically sustainable to the City's residents. The *Parks Master Plan* includes 13 goals and policy areas, which provide the framework for a strategy to upgrade the City's parks system (City of San Diego 2021d).

San Diego River Park Master Plan

The San Diego River is approximately 17.5 miles long and runs east to west from the Cuyamaca Mountains to the Pacific Ocean. The purpose of the *San Diego River Master Plan* is to provide strategies to reverse the impacts development has had on the river. The goals of the *San Diego River Master Plan* are similar to that of the City's General Plan and provide the City with strong framework for future development along the river (City of San Diego 2013b).

Sunset Cliffs Natural Park Master Plan

The Sunset Cliffs Natural Park is located in the southwestern portion of the City, along the western shoreline of the Point Loma Peninsula. The park is located within the City's MSCP area and is adjacent to the Point Loma Ecological Reserve. The goal of the *Sunset Cliffs Natural Park Master Plan* is to preserve the natural coastal environment (City of San Diego 2005d).

City of San Diego Utilities Undergrounding Program Master Plan (December 2017)

The *Utilities Undergrounding Program Master Plan* (Master Plan) provides the guidance for how the City will execute future undergrounding work. The Master Plan includes history about the Project and previous master plans, Project governing policies, and details about the undergrounding process (City of San Diego 2017c).

City of San Diego Municipal Code – Underground Utilities Procedural Ordinance

In Chapter 06, Article 01, Division 05, the SDMC includes language that relates to the Project. The SDMC gives many details on the undergrounding process, including the Project's interaction with the Council, the Project's responsibility to residents, and overall undergrounding requirements and definitions.

City of San Diego Municipal Code – Grading Regulations

Chapter 14, Article 2, Division 1 of the SDMC contains grading regulations. The purpose of grading regulations is to "address slope stability, protection of property, erosion control, water quality, landform preservation, and paleontological resources preservation, and to protect the public health, safety, and welfare of persons, property, and the environment." Grading regulations apply to all grading work even if a permit or other approval is not required. SDMC Section 142.0103 includes requirements for grading permits.

City of San Diego Municipal Code – Environmentally Sensitive Lands Regulations

Chapter 14, Article 03, Division 01 of the SDMC contains environmentally sensitive lands (ESLs) regulations. The purpose of the regulations is to "protect, preserve and, where damaged, restore the environmentally sensitive lands of San Diego and the viability of the species supported by those lands." ESLs are defined to include sensitive biological resources, steep hillsides, coastal beaches, sensitive coastal bluffs, and 100-year floodplains. Any development that requires encroachment into ESL types identified in the ESL regulations is required to obtain either a Neighborhood Development Permit or a Site Development Permit.

City of San Diego Municipal Code – Coastal Overlay Zone

The Coastal Overlay Zone is imposed to protect and enhance the quality of public access and coastal resources. The Project would include construction activities located within the zone, which applies to areas designated on Figure CE-3 of the City's General Plan (City of San Diego 2024). Projects within the City's coastal jurisdiction where the Coastal Commission has certified the Local Coastal Program Land Use Plan are exempt from the requirement to obtain a Coastal Development Permit pursuant to SDMC Section 126.0704(e). Projects in areas in the Coastal Overlay Zone where the Coastal Commission has not certified the City's local land use plan would require a determination from the Coastal Commission as to whether a Coastal Development Permit is required.

Land Development Code – Landscape Standards

The Landscape Standards establish the minimum plant material, irrigation, brush management, and landscape-related standards for work done in accordance with requirements of the Land Development Code. They provide guidelines and alternative methods to meet regulations based on various site

conditions. Additionally, the Landscape Standards provide the technical standards to create and maintain landscapes that conserve and efficiently use water. Post-construction improvements of the Project would include landscaping where feasible. Any landscape-related improvements are required to comply with SDMC Section 142.0403 in addition to the Landscape Standards.

Multiple Species Conservation Program

The City is a participant in the San Diego MSCP, a comprehensive, regional long-term habitat conservation program designed to provide permit issuance authority for take of covered species to the local regulatory agencies. Within the City, the MSCP is implemented through the *City of San Diego MSCP Subarea Plan* (City of San Diego 1997), which encompasses 206,124 acres. Section 1.4 of the *MSCP Subarea Plan* includes land use considerations that are to be used in planning of projects located adjacent to or within the Multi-Habitat Planning Area (MHPA). These policies and guidelines address the construction and maintenance of roads and utilities, fencing, lighting, signage, materials storage, mining/extraction/processing facilities, and flood risk reduction facilities. The goal of these policies and guidelines is to ensure minimal impact to the MHPA (City of San Diego 1997).

City of San Diego Vernal Pool Habitat Conservation Plan

The *Final City of San Diego Vernal Pool Habitat Conservation Plan* (VPHCP) area encompasses 206,124 acres within the MSCP Subarea Plan area in the southwestern portion of San Diego County. The Final VPHCP is a separate conservation plan for vernal pools and species not covered under the MSCP. The five plant and two crustacean species covered by the Final VPHCP are as follows:

- Otay Mesa mint (*Pogogyne nudiuscula*)
- San Diego mesa mint (*Pogogyne abramsii*)
- Spreading navarretia (*Navarretia fossalis*)
- San Diego button-celery (*Eryngium aristulatum* var. *parishii*)
- California Orcutt grass (*Orcuttia californica*)
- Riverside fairy shrimp (*Streptocephalus woottoni*)
- San Diego fairy shrimp (*Branchinecta sandiegonensis*)

The Project study area is covered under the Final VPHCP as it is a public infrastructure program and will be permitted through the City. The covered projects under the Final VPHCP are identified in the MHPA with a hard-line preserve boundary that distinguishes between the take-authorized development area and the associated conservation area.

The purpose of the Final VPHCP is to “preserve a network of vernal pool habitat in a matrix of open space; protect the biodiversity of these unique wetlands; and define a formal strategy for their long-

term conservation, management, and monitoring" (City of San Diego 2017d). Projects covered under the Final VPHCP have areas delineated for both development and preservation and/or mitigation. The MHPA hard-line preserve boundaries for covered projects are established after evaluation of habitat and species surveys conducted, evaluation by wildlife agencies, and consideration of how the proposed vernal pool conservation best contributes to the overall Final VPHCP planning effort (City of San Diego 2017d).

Council Policy 900-19

Street trees present within the proposed UUDs are subject to Council Policy 900-19, Public Tree Protection, which provides for protection of tree resources located within public rights-of-way and within open space easements on private property, except if a tree is a threat to public safety. Program construction activities should avoid disturbance to tree canopies and root zones where feasible. Any significant tree pruning, or root pruning shall be conducted under the guidance of a licensed arborist. If construction activities would damage the health and viability of a tree, tree removal and replacement can be conducted under the direction of a licensed arborist. Additionally, for trees with a trunk caliper dimension greater than 8 inches at 4 feet above grade, tree removal permits require consultation with the City Urban Forester. For each tree removed, a replacement tree will be planted within a suitable area along the lot's street frontage at the post-undergrounding improvement phase, provided that the abutting property owners sign a maintenance agreement for the establishment of the tree.

4.5.4 THRESHOLDS OF SIGNIFICANCE

The City's *CEQA Significance Determination Thresholds* (City of San Diego 2022b) are based on CEQA Guidelines Appendix G and contain thresholds of significance related to land use. For the purposes of this land use analysis, the Project would have a significant environmental impact if it would:

1. Require a deviation or variance, and the deviation or variance would in turn result in a physical impact on the environment
2. Result in a conflict with the goals, objectives, and recommendations of the community plan in which it is located
3. Conflict with the provisions of the City's Multiple Species Conservation Program Subarea Plan or other approved local, regional, or state habitat conservation plan

4.5.5 APPROACH AND METHODOLOGY

For purposes of this land use analysis, impacts are considered potentially significant if implementation of a Project improvement could result in a deviation or variance that would result in a physical impact; conflict with the goals, objectives, and recommendations of applicable plans; and/or conflict with provisions of the City's MSCP or VPHCP.

The consistency analysis presented in 4.5.6, Impacts, was prepared in compliance with CEQA Guidelines Section 15125(d). The purpose of the required analysis is to identify potential inconsistencies between the Project and applicable adopted plans. Neither CEQA nor the CEQA Guidelines set forth standards for determining when a project is inconsistent with an applicable plan, but the final determination that a project is consistent or inconsistent with an applicable plan should be made by the Lead Agency when it acts on the project. The analysis below presents the findings of the policy review and is intended to provide a guide to the decision-makers for policy interpretation.

A project's inconsistency with a policy is only considered significant if such inconsistency would cause significant physical environmental impacts (as defined by CEQA Guidelines Section 15382). Under this approach, a policy conflict is not in and of itself considered to be a significant environmental impact. An inconsistency between a proposed project and an applicable plan is a legal determination that may or may not indicate the likelihood of a physical environmental impact. In some cases, an inconsistency may be evidence that an underlying physical impact is significant and adverse.

Land use impacts that could occur with implementation of the Project are analyzed to the extent feasible at this time; however, additional project-level CEQA analysis and/or new or amended permits may be required prior to implementation.

4.5.6 IMPACTS

Potential impacts associated with implementation of the Project activities are identified in this section.

Issue 1: Would the Project require a deviation or variance, and the deviation or variance would in turn result in a physical impact on the environment?

All activities associated with implementation of the Project would be located within the City's geographic boundaries and jurisdiction. The Master Plan sets forth the approach and process for undergrounding utilities. The Master Plan was approved by City Council and has resulted in the successful conversion of approximately 460 miles of overhead utilities with approximately 1,000 miles of overhead utility lines remaining (Redmond, pers. comm., 2024). Utility lines are standard

infrastructure within any city and are essential to provide modern conveniences. No deviation or variance is anticipated. Furthermore, the placement of utilities underground will remove physical barriers that potentially divide an existing community. However, in the event that a specific project implemented under the Project were to require a variance or deviation that would in turn result in a physical impact on the environment, the project would be evaluated separately. Therefore, the impact would be **less than significant**.

Issue 2: Would the Project result in a conflict with the goals, objectives, and recommendations of the community plan in which it is located?

General Plan and Community Plan Consistency

The proposed activities under the Project would consist of the systematic conversion of overhead utilities to underground throughout the City. Land use and zoning designations vary throughout the Project area. The General Plan describes present and planned land use activities designed to achieve the community's long-range goals. It also establishes policies to direct land use and development. The process to deliver an undergrounding project under the Project is a collaborative effort between the City and the utility companies that consists of the following process: district creation, design, pre-construction activities, undergrounding construction, and post-undergrounding improvements.

The Project is intended to prioritize undergrounding projects with the greatest public benefit; align with Council Policy 600-08 for the Project; improve public health, safety, and welfare; and reduce impacts to neighborhood and communities within the City. Overall, the Project is not anticipated to conflict with any applicable land use plans, policies, or regulations of local agencies (see Table 4.5-1, General, Community, and Park Plan Consistency Evaluation).

Table 4.5-1
General, Community, and Park Plan Consistency Evaluation

Goals, Policies, Recommendations	Consistency
City of San Diego General Plan	
Land Use and Community Planning Element **Goal.** A just and equitable society through inclusive public outreach and participation in the planning process. **LU-F.2.** Review public and private projects to ensure that they do not adversely affect the General Plan and community plans. Evaluate whether proposed projects implement specified land use, density/intensity, design guidelines, and other General Plan and	The Project includes utility undergrounding improvements throughout the City of San Diego (City). Additionally, Project improvements would include a public hearing process and public notification and community outreach to ensure that residents are informed and to give residents and community members a chance to provide input on Project specifics prior to construction. The Project would be consistent with this goal.

Table 4.5-1
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Goals, Policies, Recommendations	Consistency
community plan policies including open space preservation, community identity, mobility, and public facilities. **Goal.** A just and equitable society through inclusive public outreach and participation in the planning process. **LU-H.1.** Promote development of balanced communities that take into account community-wide involvement, participation, and needs. b. Invest strategically in public infrastructure and offer development incentives that are consistent with the neighborhood's vision. d. Ensure that neighborhood development and redevelopment addresses the needs of older people, particularly those disadvantaged by age, disability, or poverty.	The Project would be consistent with and support the goals and policies of the City's General Plan and associated Community Plans (and Local Coastal Programs) by enhancing the built environment by removing overhead utility lines and thus removing visual and physical obstructions in the public realm. See above regarding public involvement, public outreach, public hearings, and public notifications of the Project and associated processes.
Mobility Element **ME-A.1.** Design and operate sidewalks, streets, and intersections to emphasize pedestrian safety and comfort through a variety of street design and traffic management solutions, including but not limited to those described in the Pedestrian Improvements Toolbox, Table ME-1. **ME-A.5.** Provide adequate sidewalk widths and clear path of travel as determined by street classification, adjoining land uses, and expected pedestrian usage. a. Minimize obstructions and barriers that inhibit pedestrian circulation. b. Consider pedestrian impacts when designing the width and number of driveways within a street segment.	The Project proposes systematic conversion of aboveground utilities to underground utilities. Additionally, post-construction improvements would ensure that curb ramps, streetlights, and landscaping are consistent with existing City standards. Pedestrian curb ramps would be installed where required by access law allowing wheelchairs to cross the street. Existing curb ramps may also be replaced, if necessary, to meet current City and Americans with Disabilities Act (ADA) standards. Additionally, existing streetlights that are currently affixed to wooden utility poles would be replaced with stand-alone fixtures in accordance with the City's current streetlight standards. In many cases, this process would relocate lighting from their existing locations and additional lighting would be added as needed. Pavement damage resulting from construction activities would be

Table 4.5-1
General, Community, and Park Plan Consistency Evaluation

Goals, Policies, Recommendations	Consistency
ME-E.12. Preserve and protect scenic vistas along streets. a. Identify state highways where the City desires to preserve scenic qualities and work with Caltrans to pursue official scenic highway designation. b. Designate scenic routes along City streets to showcase scenic vistas and to link points of visitor interest. c. Adopt measures to protect aesthetic qualities within scenic highways and routes.	repaired, and most streets would receive a slurry seal treatment at the end of the Project. Occasionally, concrete street panels would need to be resurfaced. Additionally, by undergrounding utilities, scenic views and vistas would be enhanced. Therefore, the Project would be consistent with these policies.
Urban Design Element **UD-A.4.** Use sustainable building methods in accordance with the sustainable development policies in the Conservation Element. **UD-A.9:** Respect the context of historic streets, landmarks, and areas that give a community a sense of place or history. A survey may be done to identify "conservation areas" that retain original community character in sufficient quantity and quality but typically do not meet designation criteria as an individual historical resource or as a contributor to a historical district. a. Create objective design criteria to be used for new development, so that a neighborhood's historic character is complemented within the conservation areas where appropriate (see also Historical Preservation Element, Policy HP-A.2). b. Review the redevelopment of property within conservation areas to maintain important aspects of the surviving community character that have been identified as characteristics of a neighborhood that could be preserved.	The Project proposes systematic conversion of aboveground utilities to underground utilities. Project improvements would not impact historic resources and would ultimately improve the visual character of the community even though transformers, cable boxes, and pedestals would be located above ground not below in vaults. The replacement of aboveground utilities with underground utilities would reduce the visual appearance of existing public utilities. The functionality of the systems would remain the same, but the improvement would increase the visual character of improved areas. Additionally, post construction improvements would ensure that curb ramps, streetlights, and landscaping are consistent with existing City standards. The Project would be consistent with these goals.

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General, Community, and Park Plan Consistency Evaluation

Goals, Policies, Recommendations	Consistency
UD-A.17. Minimize the visual impact of wireless facilities. a. Conceal wireless facilities in existing structures when possible, otherwise use camouflage and screening techniques to hide or blend them into the surrounding area. b. Design facilities to be aesthetically pleasing and respectful of the neighborhood context. c. Conceal mechanical equipment and devices associated with wireless facilities in underground vaults or unobtrusive structures. **UD-A.18.** Minimize the visual and functional impact of utility systems and equipment on streets, sidewalks, and the public realm. a. Convert overhead utility wires and poles, and overhead structures such as those associated with supplying electric, communication, community antenna television, or similar service to underground. b. Design and locate public and private utility infrastructure, such as phone, cable and communications boxes, transformers, meters, fuel ports, back-flow preventors, ventilation grilles, grease interceptors, irrigation valves, and any similar elements, to be integrated into adjacent development and as inconspicuous as possible. To minimize obstructions, elements in the sidewalk and public right of way should be located in below grade vaults or building recesses that do not encroach on the right of way (to the maximum extent permitted by codes). If located in a landscaped setback, they should be as far	

Table 4.5-1
General, Community, and Park Plan Consistency Evaluation

Goals, Policies, Recommendations	Consistency
from the sidewalk as possible, clustered and integrated into the landscape design, and screened from public view with plant and/or fencelike elements. c. Traffic operational features such as streetlights, traffic signals, control boxes, street signs and similar facilities should be located and consolidated on poles, to minimize clutter, improve safety, and maximize public pedestrian access, especially at intersections and sidewalk ramps. Other street utilities such as storm drains and vaults should be carefully located to afford proper placement of the vertical elements. **UD-C.5.** Design or retrofit streets to improve walkability, strengthen connectivity, and enhance community identity. a. Design or retrofit street systems to achieve high levels of connectivity within the neighborhood street network that link individual subdivisions/projects to each other and the community. b. Avoid closed loop subdivisions and extensive cul-de-sac systems, except where the street layout is dictated by the topography or the need to avoid sensitive environmental resources. c. Design open ended cul-de-sacs to accommodate visibility and pedestrian connectivity, when development of cul-de-sacs is necessary. d. Emphasize the provision of high quality pedestrian and bikeway connections to transit stops/stations, village centers, and local schools. e. Design new streets and consider traffic calming where necessary, to reduce	

Table 4.5-1
General, Community, and Park Plan Consistency Evaluation

Goals, Policies, Recommendations	Consistency
neighborhood speeding (see also Mobility Element). f. Enhance community gateways to demonstrate neighborhood pride and delineate boundaries. g. Clarify neighborhood roadway intersections through the use of special paving and landscape. h. h. Develop a hierarchy of walkways that delineate village pathways and link to regional trails. i. Discourage use of walls, gates and other barriers that separate residential neighborhoods from the surrounding community and commercial areas. j. Encourage design features that integrate new development into the surrounding community.	
Noise Element **NE-G.1.** Implement limits on the hours of operation for non-emergency construction and refuse vehicle and parking lot sweeper activity in residential areas and areas abutting residential areas. **NE-G.2.** Implement limits on excessive public noises that a person could reasonably consider disturbing and/or annoying in residential areas and areas abutting residential areas.	Undergrounding utility improvements are proposed throughout the City, adjacent to various land uses. Construction activities under the Project would be limited to 7:00 a.m. through 7:00 p.m. (except holidays), pursuant to Section 59.5.0404 of the San Diego Municipal Code (SDMC). Once construction activities are complete, the Project improvements would have negligible noise impacts during long-term operation. The Project would be consistent with these goals.
Public Facilities, Services, and Safety Element **PF-A.1.** Plan for infrastructure and public spaces that are models of environmental, economic, and social stewardship and that serve as examples for private development. **PF-A.3.** Consider the potential impacts of changing demographics, conditions and other	Project improvements would be constructed primarily within the public right-of-way (ROW). Trenching or tunneling would be the construction activity with the greatest impacts. Trenching within the public ROW could alter existing drainage infrastructure. Once conduit and cable are installed, impacted streets would be repaired and resurfaced to their original condition. Construction activities would not

Table 4.5-1
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Goals, Policies, Recommendations	Consistency
events – such as climate change, technological changes, and natural and manmade disasters – to ensure resilient infrastructure and public spaces. **Fire Rescue Goal 1.** Protection of life, property, and environment by delivering the highest level of emergency and fire-rescue services, hazard prevention, and safety education. **Fire Rescue Goal 2.** Minimize fire hazards resulting from structural or wildland fires. **PF-G.5.** Identify and implement BMPs for projects that repair, replace, extend or otherwise affect the storm water conveyance system. These projects should also include design considerations for maintenance, inspection, and, as applicable, water quality monitoring. **PF-I.2.** Maximize waste reduction and diversion. f. Reduce and recycle Construction and Demolition debris. g. Strive for recycling of 100 percent of inert Construction and Demolition materials and a minimum of 50 percent by weight of all other material. **PF-L.2.** Coordinate with all agencies and programmed project schedules to minimize disruptions to community members and public rights-of-way, and incorporate information infrastructure needs and opportunities. **PF-M.1.** Ensure that public utilities are provided, maintained, and operated in a cost-effective manner that protects community members and enhances the environment. **PF-M.2.** Coordinate with all public and private utilities to focus utility capital investments and design projects to help implement the City of Villages strategy.	cause long-term impacts to the existing stormwater conveyance system. Additionally, a stormwater pollution prevention plan (SWPPP) would be prepared and implemented during construction activities, in compliance with the National Pollutant Discharge Elimination System (NPDES) Construction Permit requirements, to ensure that stormwater is not contaminated by construction activities. Implementation of the Project would reduce visible and physical utility improvements at the surface. These improvements would improve the visible character of the City and remove large utility poles from existing sidewalks. The Project proposes replacement of aboveground utilities with underground utilities. The improvements would follow the alignment of existing utilities, but there would be minimal visual impacts once construction is complete. The Project would adhere to waste reduction requirements by minimizing construction waste. The City and SDG&E would coordinate with all applicable agencies and communities throughout which undergrounding activities would occur to minimize disruptions during construction. The Project would site and design all undergrounding activities to avoid hazards and hazardous areas to the maximum extent practicable, would reduce hazards associated with overhead transmission infrastructure by placing alignments underground, and would reduce climate change-related impacts to infrastructure by placing overhead transmission infrastructure permanently underground.

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Goals, Policies, Recommendations	Consistency
PF-M.3. Integrate the design and siting of safe and efficient public utilities and associated facilities into the early stages of the long-range planning and development process, especially in redevelopment/urban areas where land constraints exist. **PF-P.13.** As part of the community plan update process, update plans and zoning to limit future development in hazard areas. **PF-P.16.** Continue to address the effects of climate change and implement the strategies within Climate Resilient SD, a comprehensive climate adaptation and resilience plan that integrates and builds upon the applicable strategies identified in the General Plan and Climate Action Plan. **PF-P.17.** Monitor climate change-related impacts with local, regional, state, federal, and/or local tribal partners to provide information about the effectiveness of existing infrastructure and programs.	Therefore, the Project would be consistent with these goals.
Recreation Element **RE-C.2.** Protect, manage and enhance parks and open space lands through appropriate means which include sensitive planning, park and open space dedications, and physical protective devices. **RE-C.10**. Develop strategies that adapt public rights-of-way that support recreation, walkability/rollability, sociability, bikeability, and health while reducing vehicular congestion and emissions.	Implementation of the Project would reduce visible and physical utility improvements at the surface and enhance the visual quality of regional and citywide parks/open space systems. As such, implementation of the Project would contribute to the City's identity and quality of life for residents and visitors. The Project would remove visual and physical obstructions in the built environment and public realm, creating new spaces in public rights-of-way to support recreation and benefit other elements of civic life, and eliminate incompatible uses adjacent to parks and open spaces.

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Goals, Policies, Recommendations	Consistency
RE-F.2. Protect and enhance park lands from adjacent incompatible uses and encroachments.	Therefore, the Project would be consistent with these policies.
Conservation Element **CE-G.1.** Preserve natural habitats pursuant to the MSCP and VPHCP, preserve rare plants and animals to the maximum extent practicable, and manage all City-owned native habitats to ensure their long-term biological viability. a. Educate the public about the impacts invasive plants have on open space. b. Remove, avoid, or discourage the planting of invasive plants. c. Pursue funding for removal of established populations of invasive plants within the MHPA and open space.	The Project would be implemented largely within urban, developed areas. If utility undergrounding is proposed within an open space area, San Diego Gas & Electric Company (SDG&E) would provide post-construction improvements to return the site to its original condition, utilizing City standards and regulations. However, although unlikely, the Project would involve construction activities that could result in impacts to sensitive vegetation communities and species. As such, the Project would implement Mitigation Measure (**MM)-BIO-5, MM-BIO-6a**, and **MM-BIO-6b**to lessen the significance of such impacts. Therefore, the Project would be consistent with this goal.
Historical Preservation Element **HP-A.2.** Fully integrate the consideration of historical and cultural resources in the larger land use planning process. a. Promote early conflict resolution between the preservation of historical resources and alternative land uses. b. Encourage the consideration of historical and cultural resources early in the development review process by promoting the preliminary review process and early consultation with property owners, community and historic preservation groups, land developers, Native Americans, and the building industry. c. Include historic preservation concepts and identification of historic buildings,	The Project involves the conversion of aboveground utilities to underground. Construction of new utility undergrounding projects and the subsequent removal of overhead utility systems generally consists of trenching or tunneling, cabling, cut-overs, and pole removal. Upon completion of conversion of utility systems, post-undergrounding improvements would be considered. Construction activities would potentially cause adverse risks to historical and cultural resources in project areas. Mitigation measures are required to reduce potentially significant impacts to archaeological cultural resources to a level that is less than significant. The Project Sensitivity Categories guide the application of mitigation measures to each individual undergrounding project. For

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Goals, Policies, Recommendations	Consistency
structures, objects, sites, neighborhoods, and non-residential historical resources in the community plan update process. d. Conservation areas that are identified at the community plan level, based on historical resources surveys, may be used as an urban design tool to complement community character (see also Urban Design Element, Policy UD-A.7). e. Make the results of historical and cultural resources planning efforts available to planning agencies, the public and other interested parties to the extent legally permissible.	instance, undergrounding projects that are designated to Category 1 have low sensitivity and pose no potential impact to cultural resources; therefore, mitigation would be minimal or not required for Category 1 projects. Conversely, undergrounding projects that are designated to Category 3 are moderately to highly sensitive and have an increased potential to impact cultural resources. These undergrounding projects would require mitigation in the form of cultural monitoring or possible avoidance. Implementation of the Project would result in the removal of aboveground utility poles and lines that cause a visual obstruction. Removal of utility poles and lines would enhance the community character of the project areas and, thus, preserve the visual quality of any nearby historical and cultural resources. Therefore, the Project would be consistent with this goal.
Environmental Justice Element **Climate Change and Resilience Goal.** Reduce exposure to climate change and increase climate resilience. **EJ-B.1.** Encourage the use of noise-reducing materials and construction techniques in sensitive receptor development to ensure peaceful and healthy living environments and ensure compatibility between land uses (see Noise Element).	The Project would reduce the potential of overhead lines exacerbating fire risk during adverse weather events and would protect established tree canopy in the City. At-risk or fire-prone areas can often occur in areas where open spaces or canyon lands occur in the vicinity of urban or suburban settings. As undergrounding has the potential to reduce the risk of catastrophic fire in fire-prone areas, it provides benefits to the communities in which it is occurring. Furthermore, undergrounding utility improvements are proposed throughout the City, adjacent to various land uses. Construction activities under the Project would be limited to 7:00 a.m. through 7:00 p.m. (except holidays), pursuant to SDMC Section 59.5.0404. Once construction activities are complete, the Project improvements would

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Goals, Policies, Recommendations	Consistency
	have negligible noise impacts during long-term operation. The Project would be consistent with these goals.
Community Plans	
Black Mountain Ranch Subarea Plan	
Community Facilities Element **Implementing Principle.** Provide for the development of essential schools, parks, and library facilities; police and fire protection services; and public utilities.	Implementation of the Project would reduce visible and physical utility improvements at the surface. These improvements would improve the visible character of the City and remove large utility poles from existing sidewalks. The Project proposes replacement of aboveground utilities with underground utilities. The improvements would follow the alignment of existing utilities, but there would be minimal visual impacts once construction is complete. The Project would be consistent with the goals in the *Black Mountain Ranch Subarea Plan*.
Carmel Valley Community Plan	
Community Plan Goals and Planning Concepts • To establish self-containment and feeling of community identity among the future residents of North City West (Carmel Valley) • To preserve the natural environment **Public Services and Facilities Element** **Objective.** In order to promote self-containment and community identity, excellence in the design of all public facilities will be required. The arrangement or grouping of facilities, preferably in an architecturally and carefully controlled environment in a manner complimenting other land uses, will promote the image of North City West (Carmel Valley) as a new community.	The replacement of aboveground utilities with underground utilities would reduce the visual appearance of existing public utilities, preserving the natural environment of the community. Removing aboveground utility poles and lines would enhance the visual quality and identity of the community. Project improvements would be constructed primarily within the public ROW. Trenching or tunneling would be the construction activity with the greatest impacts. Trenching within the public ROW could alter existing drainage infrastructure. Once conduit and cable are installed, impacted streets would be repaired and resurfaced to their original condition. Construction activities would not cause long-term impacts to the existing stormwater conveyance system. Additionally, a SWPPP would be prepared and implemented during

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Goals, Policies, Recommendations	Consistency
	construction activities, in compliance with the NPDES Construction Permit requirements, to ensure that stormwater is not contaminated by construction activities. Therefore, the Project would be consistent with the objectives in the *Carmel Valley Community Plan*.
Clairemont Mesa Community Plan	
Community Facilities Element **Recommendation.** All utility wires and transmission lines in Clairemont Mesa should be placed underground where technically and economically feasible. Priority areas for the undergrounding of overhead utility wires should include the community's major transportation corridors in order to visually improve the community character. These areas include: a. West Morena Boulevard from Tecolote Road to Morena Boulevard b. Morena Boulevard from West Morena Boulevard to Balboa Avenue c. Balboa Avenue from Morena Boulevard to Genesee Avenue d. Clairemont Drive from Morena Boulevard to Balboa Avenue	The Project is managed by the City's Transportation Department in coordination with SDG&E and other utilities that provide telephone, cable television, and broadband services throughout the City. The Project proposes systemic conversion of aboveground utilities to underground utilities. The implementation of proposed activities would occur based on a prioritization system developed by the City and would be implemented as funding allows. The Project is intended to prioritize projects with the greatest public benefit. City Council holds a public hearing to establish the districts for each undergrounding project. All residents and property owners within a district are mailed a public hearing notice and a map of the proposed area to be converted to underground. Any member of the public may attend and speak at the public hearing. Therefore, the Project would be consistent with the recommendations in the *Clairemont Mesa Community Plan*.
College Area Community Plan	
Public Facilities Element **Public Facilities Goal.** Ensure a high level of public services to the community. **Objective**. Maintain public utilities at a level which meets the future needs of the community.	The Project is managed by the City's Transportation Department in coordination with SDG&E and other utilities that provide telephone, cable television, and broadband services throughout the City. The design phase of the Project would include an examination of existing underground utility

Table 4.5-1
General, Community, and Park Plan Consistency Evaluation

Goals, Policies, Recommendations	Consistency
	infrastructure that would be mapped prior to construction to ensure implementation of the undergrounding work would not interfere or conflict with existing utility systems and services in the area. Therefore, the Project would be consistent with the goals in the *College Area Community Plan*.
Del Mar Mesa Specific Plan	
Land Use Element **Goal.** To preserve the rural character of Del Mar Mesa while accommodating clustered development and the preservation of open space. *Guidelines for Resource Based Open Space Areas and Adjacent Areas* • All proposed utility lines (e.g., sewer, water, etc.) should be designed to avoid or minimize intrusion into the MHPA. These facilities should be routed through developed or developing areas rather than the MHPA, where possible. If no other routing is feasible, then the lines should follow previously existing roads, easements, rights-of-way, and disturbed areas, minimizing habitat fragmentation. • All new development for utilities and facilities within or crossing preserve areas shall be planned, designed, located and constructed to minimize environmental impacts. All such activities must avoid disturbing the habitat of MSCP covered species and wetlands. If avoidance is infeasible, mitigation will be required.	The Project includes utility undergrounding improvements throughout the City. The Project would be implemented largely within urban, developed areas. If utility undergrounding is proposed within an open space area, SDG&E would provide post-construction improvements to return the site to its original condition, utilizing City standards and regulations. Projects occurring adjacent to the Multi-Habitat Planning Area (MHPA) must adhere to the MHPA Land Use Adjacency Guidelines as outlined in Section 1.4.3 of the City's *MSCP Subarea Plan*. Table 4.5-2, which is discussed further in this section, presents the determination of consistency between the Project and MHPA guidelines. Additionally, the Project would implement **MM-BIO-2** and **MM-BIO-3** to reduce impacts resulting from projects adjacent to the MHPA. In the event that a project is implemented under the Project and would cause activities to occur that may impact a listed species, field surveys may be conducted to assess the vegetation communities on site and determine if potential impacts would result from pole removal and/or undergrounding activities (including noise). As presented in Table 4.5-2, compliance with and implementation of the measures within the *MSCP Subarea Plan* would ensure that potential indirect impacts are reduced to below a level of significance.

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Goals, Policies, Recommendations	Consistency
	Therefore, the Project would be consistent with the goals in the *Del Mar Mesa Specific Plan*.
Downtown Community Plan	
Urban Design Element **Policy 5.4-P-3.** Work with the other City departments and utilities to remove impediments to sidewalk safety and movement, undergrounding utilities/transformers or locating them on site where possible.	The Project proposes the conversion of aboveground utilities to underground utilities. These improvements would improve the visual character of the City and remove large utility poles from existing sidewalks. Additionally, post construction improvements would ensure that curb ramps, streetlights, and landscaping are consistent with existing City standards. Therefore, the Project would be consistent with the policies in *Downtown Community Plan*.
East Elliot Community Plan	
Open Space Management Guidelines • Natural open space areas should remain undeveloped with disturbance limited to trails and passive recreational uses such as walking, hiking and nature study that are consistent with preservation of natural resources. • Disturbed areas designated for open space should be recontoured where feasible, to recreate the natural topography. These areas should also be restored or enhanced where feasible with natural vegetation to return these areas to a natural appearance.	The Project would be implemented largely within urban, developed areas. If utility undergrounding is proposed within an open space area, SDG&E would provide post-construction improvements to return the site to its original condition, utilizing City standards and regulations. Therefore, the Project would be consistent with the guidelines in the *East Elliot Community Plan*.
Encanto Neighborhoods Community Plan	
Public Utilities, Wireless Communications Facilities, and Street Lights **Policy P-PF-16.** Expedite the undergrounding of overhead utility lines. **Policy P-PF-17.** Require that utilities be undergrounded as part of new development or other infrastructure projects.	The Project proposes the conversion of aboveground utilities to underground utilities. Approvals needed for the conversion of overhead utilities to underground include City Council approval for the allocation and creation of each undergrounding district and Development Services Department approval of ROW permits for construction. City Council holds a public hearing to establish a district for each undergrounding project. This

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Goals, Policies, Recommendations	Consistency
Pedestrian Environment and Connectivity **Policy P-UD-83.** Prohibit above ground utility placement in the pedestrian path of travel and support the undergrounding of utilities wherever possible to improve visual quality in the community.	creates an overlay that restricts utility companies from installing new aboveground utility lines within each district boundary (excluding electric transmission lines, which are regulated by the California Public Utilities Commission [CPUC]). Therefore, the Project would be consistent with the policies in the *Encanto Neighborhoods Community Plan*.
Fairbanks Ranch Country Club Community Plan	
Open Space Goal. Establish an open space system that provides for the preservation of natural resources, the managed production of resources, the provision of outdoor recreation, the protection of public health and safety, and the utilization of the varied terrain and natural drainage systems of the San Diego community to guide the form of urban development.	The Project proposes the conversion of aboveground utilities to underground utilities. Undergrounding utilities would enhance the visual and physical quality of open space areas and improve public safety. Therefore, the Project would be consistent with the goals in the *Fairbanks Ranch Country Club Community Plan*.
Golden Hill Community Plan	
Public Facilities, Services & Safety Element **Policy PF-3.13.** Expedite the undergrounding of overhead utility lines. A. Provide sufficient oversight to insure preservation of aesthetics in replacement and repair of impacted infrastructure, especially on historic properties, and historic public improvements (e.g. sidewalks, curbs, hardscape, etc.). B. Locate transformers within parkway areas in a manner that does not reduce sidewalk width when their location on private property is not possible. **Urban Design Element** **Policy UD-2.33.** Improve pedestrian environments in the community with wider sidewalks where needed, enhanced crosswalks and paving, better access and connectivity,	The Project proposes the conversion of aboveground utilities to underground utilities. Approvals needed for the conversion of overhead utilities to underground include City Council approval for the allocation and creation of each undergrounding district and Development Services Department approval of ROW permits for construction. Undergrounding utilities would enhance the visual character and improve pedestrian environments in the community. Once the new underground utility lines are in place, the City would construct the following improvements: **Curb Ramps** Pedestrian curb ramps would be installed where required by access law allowing wheelchairs to cross the street. Existing curb ramps may also be replaced, if necessary, to meet current City and ADA standards. **Streetlights**

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Goals, Policies, Recommendations	Consistency
shade-producing street trees, street furnishings and other amenities that support walking and transit use. A. (Not applicable) B. Keep the pedestrian zone and street corners within sidewalks clear of obstructions and visual clutter. Work with utility companies to underground or relocate above ground utility boxes within the sidewalk.	Existing streetlights that are currently affixed to wooden utility poles would be replaced with stand-alone fixtures in accordance with the City's current streetlight standards. In many cases, this process would relocate lighting from their existing locations, and additional lighting would be added as needed. **Trees** To reduce the impact associated with tree removal on these projects, new street trees would be planted when the City is able to get a property owner to agree to water and care for the tree until it becomes established. **Street Repair and Resurfacing** Pavement damage resulting from construction activities would be repaired, and most streets would receive a slurry seal treatment at the end of the Project. Occasionally, concrete street panels would need to be resurfaced. Therefore, the Project would be consistent with the policies in the *Golden Hill Community Plan*.
Kearny Mesa Community Plan	
Parks, Recreation, and Open Space **Policy 6.25.** Protect the natural terrain and Kearny Mesa's open space lands to preserve the natural habitat and cultural resources.	The Project proposes systematic conversion of aboveground utilities to underground utilities. The Project would be implemented largely within urban, developed areas. If utility undergrounding is proposed within an open space or other public area, SDG&E would provide post-construction improvements to return the site to its original condition, utilizing City standards and regulations. The Project could have a significant impact to unidentified cultural resources during construction activities, As such, the Project would implement **MM-CR-1** to lessen potential impacts. Therefore, the Project would be consistent with the policies in the *Kearny Mesa Community Plan*.

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Goals, Policies, Recommendations	Consistency
Linda Vista Community Plan	
Community Facilities Element **Policy 1.** Priority should be given to undergrounding of utilities in highly visible and populated areas.	The Project proposes systemic conversion of aboveground utilities to underground utilities. The implementation of proposed activities would occur based on a prioritization system developed by the City and would be implemented as funding allows. The Project is intended to prioritize projects with the greatest public benefit. City Council holds a public hearing to establish the districts for each undergrounding project. All residents and property owners within a district are mailed a public hearing notice and a map of the proposed area to be converted to underground. Any member of the public may attend and speak at the public hearing. Therefore, the Project would be consistent with the objectives in the *Linda Vista Community Plan*.
Mid-City Communities Plan: Normal Heights, Kensington-Talmadge, City Heights, and Eastern Area Communities Plan	
Natural and Cultural Resources Element **Visual Resources Goals** • Ensure that new development preserves and enhances framed public views of existing aesthetic resources such as parks and community landmarks. • Preserve and enhance panoramic public views of the bay, open spaces, and mountains from street rights-of-way and other public areas. **Recommendation.** Continue undergrounding utilities on view corridors. **Public Facilities and Services Element** **Utilities Goal.** To provide adequate and reliable utility service while ensuring that public utilities facilities are not disruptive to the community.	The Project would replace aboveground utilities with underground utilities. The functionality of the systems would remain the same, but the improvement would increase the visual character of improved areas. The Project would be implemented largely within urban, developed areas. If utility undergrounding is proposed within an open space or other public area, SDG&E would provide post-construction improvements to return the site to its original condition, utilizing City standards and regulations. Therefore, the Project would be consistent with the goals and recommendations in the *Mid-City Communities Plan*.

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Goals, Policies, Recommendations	Consistency
Recommendation. Continue the undergrounding of overhead lines. Establish guidelines for the timely removal of utility poles once underground facilities are in place.	
Midway-Pacific Highway Community Plan	
Mobility Element **Goal**. Enhancements to streetscapes and street functionality that support pedestrian, bicycle, and transit activity. **Policy ME-2.5**. Remove accessibility barriers along pedestrian paths of travel in the public right-of-way, which may include the undergrounding of public utilities and relocation of transit shelters to widen the pedestrian pathways.	The Project proposes systematic conversion of aboveground utilities to underground utilities. Additionally, post-construction improvements would ensure that curb ramps, streetlights, and landscaping are consistent with existing City standards. Pedestrian curb ramps would be installed where required by access law, allowing wheelchairs to cross the street. Existing curb ramps may also be replaced, if necessary, to meet current City and ADA standards. Additionally, existing streetlights that are currently affixed to wooden utility poles would be replaced with stand-alone fixtures in accordance with the City's current streetlight standards. In many cases, this process would relocate lighting from their existing locations, and additional lighting would be added as needed. Pavement damage resulting from construction activities would be repaired, and most streets would receive a slurry seal treatment at the end of the Project. Occasionally, concrete street panels would need to be resurfaced. Therefore, the Project would be consistent with the goals and policies in the *Midway-Pacific Highway Community Plan*.
Mira Mesa Community Plan	
Public Facilities and Services **6. Utilities.** The City has a long-term City wide program for utility providers to underground overhead power and communication lines. **Policy 4.6.** Under-grounding Utilities. Work with utility providers to accelerate the under-	The Project would convert overhead utilities to underground. The replacement of aboveground utilities with underground utilities would reduce the visual appearance of existing public utilities. Projects occurring adjacent to the MHPA must adhere to the MHPA Land Use

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grounding of overhead communication lines and electrical distribution lines within residential neighborhoods. Work with San Diego Gas & Electric to underground transmission lines where technically and economically feasible.	Adjacency Guidelines as outlined in section 1.4.3 of City's MSCP Subarea Plan. Table 4.5.2, which is discussed further in this section, presents the determination of consistency between the Project and MHPA guidelines. The Project would implement **MM-BIO-2** and **MM-BIO-3** to reduce impacts resulting from projects adjacent to the MHPA. In the event that a project is implemented under the Project and would cause activities to occur that may impact a listed species, field surveys may be conducted to assess the vegetation communities on site and determine if potential impacts would result from pole removal and/or undergrounding activities (including noise). As presented in Table 4.5.2, compliance with, and implementation of the measures within the MSCP Subarea Plan would ensure that potential indirect impacts are reduced to below a level of significance. The Project would be implemented largely within urban, developed areas. If utility undergrounding is proposed within an open space area, SDG&E would provide post-construction improvements to return the site to its original condition, utilizing City standards and regulations. Therefore, the Project would be consistent with the goals and policies in the *Mira Mesa Community Plan*.
Miramar Ranch North Community Plan	
Public Services Element **Utilities Objective.** Provide adequate utility service for development in the community. **Communications Objective.** Provide adequate communications services to the community.	The Project proposes the systematic conversion of aboveground utilities to underground utilities throughout the City. Overhead utility lines include electric transmission lines, electric distribution lines, and telecommunications lines. Upon completion of conversion, the functionality of the systems would remain the same. As such the Project would not affect the

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	quality of existing utility and communications services provided to the City. The Project would be consistent with the objectives in the *Miramar Ranch North Community Plan*.
Mission Valley Community Plan	
Urban Design Element **Policy DG-6 (Street Trees).** Incorporate street trees into sidewalk buffer areas in order to increase shade, promote carbon sequestration, shield pedestrian pathways, and provide additional vegetation in the urban environment. **Parks: Development Adjacent to Open Space** **Policy AOS-7.** Follow the City's MHPA Land Use Adjacency Guidelines, which address indirect effects on the MHPA from adjacent development, on development adjacent to MHPA lands. Follow all Land Use Adjacency Guidelines, especially the guidance on grading and land development including drainage, toxic substances in runoff, lighting, barriers, invasive plant species, brush management, and noise.	The Project would replace aboveground utilities with underground utilities. During construction, every effort would be made to avoid modification to or removal of existing street trees; however, occasionally a tree must be removed for purposes of worker and public safety. To reduce the impact associated with tree removal on these projects, new street trees would be planted in coordination with a property owner to water and care for the tree until it becomes established. The majority of work that would be implemented under the Project is located within developed land that does not include land designated as MHPA. However, there are some projects that include the removal of poles in MHPA-designated land or trenching that is adjacent to MHPA. Utility lines and access roads are conditionally compatible uses within the MHPA. As seen in Table 4.5-2, the Project would primarily be consistent with MHPA guidelines, and with the implementation of **MM-BIO-2**, **MM-BIO-3**, **MM-BIO-6a**, and **MM BIO-6b**, impacts resulting from the projects would be reduced to less than significant. Therefore, the Project would be consistent with the policies in the *Mission Valley Community Plan*.
Navajo Community Plan	
Parks and Recreation Facilities Element **Objective.** Protect and enhance the integrity and quality of existing parks, open space and	The Project proposes systematic conversion of aboveground utilities to underground utilities. Project improvements would ultimately

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recreational programs in the Navajo Community. Residential Street Design: Underground all utilities. This should be done not only in new subdivisions but also programmed in stages in older parts of the community. With overhead wires out of the way, it is possible to allow street trees to grow; and thereby, establish a more desirable environment **Community Environment Element** **Objective.** To preserve and enhance the natural beauty and amenities of the Navajo Community.	enhance the natural beauty and amenities of the community. The replacement of aboveground utilities with underground utilities would reduce the visual appearance of existing public utilities. The Project would be implemented largely within urban, developed areas. If utility undergrounding is proposed within an open space or other public area, SDG&E would provide post-construction improvements to return the site to its original condition, utilizing City standards and regulations. Therefore, the Project would be consistent with the objectives in the *Navajo Community Plan*.
North Park Community Plan	
Public Facilities, Services and Safety Element **Policy PF-1.9.** Underground all utilities including telephone, electric power lines, and utility boxes. (Refer to General Plan policy section PF-M). a. Evaluate the prioritization of undergrounding within the North Park community in order to address priority streets and future projects that may need to be expedited in the future. **Policy PF-1.12.** Support the City's program to reduce the visual impact of wireless communication facilities.	The proposed activities under the Project would consist of the systematic conversion of overhead utilities to underground throughout the City. The implementation of proposed activities would occur based on a prioritization system developed by the City and would be implemented as funding allows. The replacement of aboveground utilities with underground utilities would reduce the visual appearance of existing public utilities. The functionality of the systems would remain the same, but the improvement would increase visual character of improved areas. Therefore, the Project would be consistent with the goals in the *North Park Community Plan*.
Old Town San Diego Community Plan	
Public Facilities, Services & Safety Element **PF-1.9.** Underground all utilities including telephone, electric power lines, and utility boxes. **PF-1.13.** Maintain historic street scoring patterns and contractor stamps as part of utility undergrounding projects.	The Project proposes to replace aboveground utilities with underground utilities. During the design phase, design professionals would coordinate with property owners to plan the construction on private property to connect homes and businesses to the underground lines.

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Policy PF-3.1. Encourage agreements between property owners and utilities to locate transformers and other utility boxes on private property whenever feasible to minimize obstacles to pedestrian activity and visual impacts. **Policy PF-3.2.** Encourage SDG&E to locate or relocate pad-mounted transformers and other utility boxes outside of the public right-of-way through the execution of utility easements. **Policy PF-3.3.** Encourage utilities undergrounding projects in Old Town. Design projects to maintain sidewalk pedestrian path of travel widths of greater than four feet.	Once the design for the subject district is complete, property owners and community members would be invited to a community forum where they would be able to provide input on the placement of utility boxes, placement of streetlights, and other areas where design flexibility in the planned undergrounding improvements remain. Environmental screenings in accordance with this EIR will be performed, including an evaluation of historic resources and appropriate treatment and/or mitigation would be implemented to protect the historic integrity of Old Town's built environment. Therefore, the Project would be consistent with the policies in the *Old Town San Diego Community Plan*.
Otay Mesa Community Plan	
Public Facilities, Services, and Safety Element **Policy 6.7-1.** Provide future utility services in the most cost-effective and environmentally sensitive manner to meet the General Plan Policies PF-M.1-4. Integrate the design and siting of safe and efficient public utilities and associated facilities into the early stages of planning and development of future projects. **Policy 6.7-2.** Site and camouflage wireless communication facilities and equipment to reduce impacts to community character.	Project improvements would be constructed primarily within the public ROW. Trenching or tunneling would be the construction activity with the greatest impacts. Trenching within the public ROW could alter existing drainage infrastructure. Once conduit and cable are installed, impacted streets would be repaired and resurfaced to their original condition. Construction activities would not cause long-term impacts to the existing stormwater conveyance system. Additionally, a SWPPP would be prepared and implemented during construction activities, in compliance with the NPDES Construction Permit requirements, to ensure that stormwater is not contaminated by construction activities. Implementation of the Project would reduce visible and physical utility improvements at the surface. These improvements would improve the visible character of the City and remove large utility poles from existing sidewalks.

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Goals, Policies, Recommendations	Consistency
	The Project proposes replacement of aboveground utilities with underground utilities. The improvements would follow the alignment of existing utilities, but there would be minimal visual impacts once construction is complete. Therefore, the Project would be consistent with the policies in the *Otay Mesa Community Plan*.
Pacific Highlands Ranch Subarea Plan	
Community Facilities **Goal 2.** Site necessary community facilities throughout Pacific Highlands Ranch in a manner that contributes to and enhances the structure and shape of the community. **Community Design** **Goal 2.** Create a vibrant community that is physically based on the preservation and enhancement of natural resources.	The Project proposes replacement of aboveground utilities with underground utilities. The improvements would follow the alignment of existing utilities, but there would be minimal visual impacts once construction is complete. Implementation of the Project would reduce visible and physical utility improvements at the surface. These improvements would improve public safety, community character, and visual quality of the community's natural resources. Therefore, the Project would be consistent with the goals in the *Pacific Highlands Ranch Subarea Plan*.
Rancho Bernardo Community Plan	
Community Facilities Element **Objective.** To locate facilities in structures that enhance the character of the community and recognize the human need and appreciation for aesthetics.	The Project would convert aboveground utilities to underground utilities when City Council determines it is in the interest of public health, safety, and welfare of the general public. The conversion of aboveground utilities to underground would increase the character of the community and improve visual quality of the surrounding area. Therefore, the Project would be consistent with the objectives in the *Rancho Bernardo Community Plan*.
Rancho Encantada Precise Plan	
Precise Plan Goals. Retain utilities within the existing SDG&E utility easements.	The Project is managed by the City's Transportation Department in coordination with SDG&E and other utilities that provide

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Goals, Policies, Recommendations	Consistency
	telephone, cable television, and broadband services throughout the City. The design phase of the Project would include an examination of existing underground utility infrastructure that would be mapped prior to construction to ensure implementation of the undergrounding work would not interfere or conflict with existing utility systems and services in the area. The Project proposes replacement of aboveground utilities with underground utilities. The improvements would follow the alignment of existing utilities, but there would be minimal visual impacts to the surrounding area once construction is complete. Therefore, the Project would be consistent with the goals in the *Rancho Encantada Precise Plan*.
Rancho Peñasquitos Community Plan	
Overall Community Goals • Ensure a pleasant and healthful physical and social environment for Rancho Peñasquitos residents by balancing development with the preservation of the community's natural resources and amenities. • Provide and maintain a high level of public facilities and services concurrent with community growth and tailored to community needs.	The Project proposes systematic conversion of aboveground utilities to underground utilities. The functionality of the systems would remain the same; thus, the Project would not affect the level of service provided to the community. Upon the completion of undergrounding utilities, existing utility poles and lines would be removed, enhancing the community's natural resources. Therefore, the Project would be consistent with the goals in the *Rancho Peñasquitos Community Plan*.
Sabre Springs Community Plan	
Public Services Element **Objective.** Encourage design of public facilities that is aesthetically compatible and environmentally sensitive with the surroundings including undergrounding of utilities and cable communications where possible.	The Project includes utility undergrounding improvements throughout the City. The replacement of aboveground utilities with underground utilities would reduce the visual appearance of existing public utilities. When all properties within a district have been switched over to the new underground system, the existing poles will be removed. As such,

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Goals, Policies, Recommendations	Consistency
	undergrounding projects implemented through the Project would enhance the visual quality of areas surrounding the Project's project sites. The Project would be consistent with the objectives in the *Sabre Springs Community Plan*.
San Pasqual Valley Community Plan	
Community Facilities and Services **Goal.** Public facilities and services provided concurrent with community need. **Circulation** **Policy 2.** Street improvements shall be compatible with the rural character of the valley. Consideration should be given to minimize impacts to the landform, where safety permits, and as determined by the City Engineer.	The Project is managed by the City's Transportation Department in coordination with SDG&E and other utilities that provide telephone, cable television, and broadband services throughout the City. The design phase of the Project would include an examination of existing underground utility infrastructure that would be mapped prior to construction to ensure implementation of the undergrounding work would not interfere or conflict with existing utility systems and services in the area. The Project proposes replacement of aboveground utilities with underground utilities. The improvements would follow the alignment of existing utilities, but there would be minimal visual impacts to the surrounding area once construction is complete. Additionally, post construction improvements would ensure that curb ramps, streetlights, and landscaping are consistent with existing City standards. The Project would be consistent with the goals and policies in the *San Pasqual Community Plan*.
Scripps Miramar Ranch Community Plan	
Public Facilities and Services Element **Objectives** • Increase the Scripps Ranch community's participation and influence in the planning of public facilities. • Assure the availability of all utilities needed for new development.	The Project includes utility undergrounding improvements throughout the City. Additionally, Project improvements would include a public hearing process and public notification and community outreach to ensure that residents are informed and to give residents and community members a chance to

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Goals, Policies, Recommendations	Consistency
	provide input on Project specifics prior to construction. Therefore, the Project would be consistent with the objectives in the *Scripps Miramar Ranch Community Plan*.
Serra Mesa Community Plan	
Environmental Management Element **Objective.** To preserve and enhance the physical environment, visual appearances, safety, identity and character of the Serra Mesa community through aesthetic improvement and careful urban design. **Proposal/Recommendation.** The visual appearance of the community should be improved by: systematic undergrounding of utility distribution lines, encouraging the use of cable television and removal of television and other outdoor antennas, imposing sign controls in all areas, limiting the size and number of billboards and off-premises advertising structures, installing street trees and landscaping along heavily traveled streets and freeways and shielding residences facing Mission Valley from lights emanating from San Diego Stadium.	The replacement of aboveground utilities with underground utilities would reduce the visual appearance of existing public utilities. The functionality of the systems would remain the same, but the improvement would increase the visual character of improved areas. Additionally, post-construction improvements would ensure that curb ramps, streetlights, and landscaping are consistent with existing City standards. Every effort would be made to avoid modification to or removal of existing street trees; however, occasionally a tree must be removed for purposes of worker and public safety. To reduce the impact associated with tree removal on these projects, new street trees would be planted when the City is able to get a property owner to agree to water and care for the tree until it becomes established. Therefore, the Project would be consistent with the objectives and proposals/recommendations in the *Serra Mesa Community Plan*.
Skyline-Paradise Hills Community Plan	
Urban Design Element **Goal.** Enhance the community's image through improvements to the visual and physical character of the community. **Objective**. Improve the streetscape in the vicinity of parks and recreation centers, public buildings and high visibility streets in order to provide a sense of identity to activity centers and the routes leading to them.	The Project proposes systematic conversion of aboveground utilities to underground utilities. Project improvements would not impact historic resources and would ultimately improve the visual character of improved areas. The replacement of aboveground utilities with underground utilities would reduce the visual appearance of existing public utilities. The functionality of the systems would remain the same, but the improvement would increase

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	visual character of improved areas. Additionally, post construction improvements would ensure that curb ramps, streetlights, and landscaping are consistent with existing City standards. Therefore, the Project would be consistent with the goals and objectives in the *Skyline-Paradise Hills Community Plan*.
Southeastern San Diego Community Plan	
Pedestrian Environment and Connectivity **Policy P-UD-90.** Prohibit above ground utility placement in pedestrian path of travel and support the undergrounding of utilities wherever possible to reduce visual blight in the community.	The City Council holds a public hearing to establish a district for each undergrounding project. This creates an overlay that restricts utility companies from installing new aboveground utility lines within each district boundary (excluding electric transmission lines, which are regulated by the CPUC). Once the design for the subject district is complete, property owners and community members would be invited to a community forum where they would be able to provide input on the placement of utility boxes, placement of streetlights, and other areas where design flexibility in the planned undergrounding improvements remain. Therefore, the Project would be consistent with the policies in the Southeastern *San Diego Community Plan*.
Tierrasanta Community Plan	
Urban Design Element **Goal.** To create a functional, affordable, efficient and diverse suburban environment which is aesthetically pleasing and sensitive to the natural environment. **Objectives** • To protect and enhance the physical environment, visual appearance, identity and character of the Tierrasanta	The Project proposes systematic conversion of aboveground utilities to underground utilities. Project improvements would ultimately improve the visual quality and character of the community. The replacement of aboveground utilities with underground utilities would reduce the visual appearance of existing public utilities. The functionality of the systems would remain the same, but the improvement would increase visual character of improved areas.

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community through aesthetic improvements and careful urban design. • To provide public improvements which enhance the community both functionally and aesthetically.	Additionally, post-construction improvements would ensure that curb ramps, streetlights, and landscaping are consistent with existing City standards. Therefore, the Project would be consistent with the goals and objectives in the *Tierrasanta Community Plan*.
Torrey Highlands Subarea Plan	
Implementation Goal. Provide for the comprehensive development of Torrey Highlands consistent with City procedures and assure the provision of adequate public facilities and services to serve residential, commercial and institutional uses in a timely manner. **Implementing Principle.** Provide for the timely financing of public facilities including buildings, recreational improvements, streets, and utilities, for both capital and operating and maintenance costs.	The Project would involve the conversion of aboveground utilities to underground utilities throughout the City. Upon completion of conversion, the functionality of the systems would remain the same. As such the Project would not affect the quality of existing utility and communications services provided to the City. The Project is funded through SDG&E and has additional funding through a Surcharge Fund. The Surcharge Fund was established by applying an underground surcharge component to residents' electric bills, managed separately from the City's General Fund. The surcharge program also funds street resurfacing, curb ramps, streetlights, and street trees within each undergrounding project boundary. Therefore, the Project would be consistent with the goals and principles in the *Torrey Highlands Subarea Plan*.
Torrey Hills Community Plan	
Community Facilities Element **Goal.** Ensure that community facilities are designed to minimize adverse impacts to environmentally sensitive resources. **Policy 9.** Encourage the design of utility facilities which are aesthetically and environmentally sensitive. This includes, to the degree financially feasible, locating utility lines of 69 KV and below, underground, and	The Project proposes the systematic conversion of aboveground utilities to underground utilities. Once utility lines have been undergrounded, existing utility poles and lines would be removed; thus, the visual resources of the community would be enhanced and preserved.

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Goals, Policies, Recommendations	Consistency
screening large, concrete-lined drainage channels and the SDG&E substation facilities.	Therefore, the Project would be consistent with the goals and policies in the *Torrey Hills Community Plan*.
University Community Plan	
Urban Design Element **Objective.** Create an attractive appearance along Governor Drive and define subarea entryways. **Recommendation.** Continuing the undergrounding of telephone and electrical lines. A utility underground district has been approved for the section of Governor Drive between Gullstrand and Genesee. The section between Genesee and Regents is scheduled for undergrounding in 1990, and the section between Regents and Stresemann for 1991.	The Project proposes systematic conversion of aboveground utilities to underground utilities. Project improvements would ultimately improve the visual quality and character of the community. The replacement of aboveground utilities with underground utilities would reduce the visual appearance of existing public utilities. The functionality of the systems would remain the same, but the improvement would increase visual character of improved areas. Additionally, post-construction improvements would ensure that curb ramps, streetlights, and landscaping are consistent with existing City standards. Additionally, the section of Governor Drive between Gullstrand Street and Genesee Avenue has since been completed. Therefore, the Project would be consistent with the objectives and recommendations in the *University Community Plan*.
Uptown Community Plan	
Urban Design Element **Policy UD-3.29.** Underground utilities particularly on commercial streets, in order to reduce conflicts with pedestrian movement and improve the aesthetic character of the public realm. Undergrounding projects should maximize space available for street trees. **Policy UD-3.62.** Underground overhead utility lines in order to improve the visual character of Uptown's alleys.	The Project proposes systematic conversion of aboveground utilities to underground utilities. Project improvements would not impact historic resources and would ultimately improve the visual character. The replacement of aboveground utilities with underground utilities would reduce the visual appearance of existing public utilities. The functionality of the systems would remain the same, but the improvement would increase the visual character of improved areas. Additionally, post-construction improvements would ensure that curb ramps, streetlights, and

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	landscaping are consistent with existing City standards. During construction, every effort would be made to avoid modification to or removal of existing street trees; however, occasionally a tree must be removed for purposes of worker and public safety. To reduce the impact associated with tree removal on these projects, new street trees would be planted when the City is able to get a property owner to agree to water and care for the tree until it becomes established. Therefore, the Project would be consistent with the policies in the *Uptown Community Plan*.
Via De La Valle Community Plan	
Public Services Element **Objective.** Require the use of underground utilities and underground cable communications, in accordance with City ordinances	The Project proposes systematic conversion of aboveground utilities to underground utilities. Implementation of the Project would adhere to City ordinances. Upon completion of undergrounding, the functionality of the systems would remain the same, but the improvement would increase the physical and visual quality of improved areas. Therefore, the Project would be consistent with the objectives of the *Via De La Valle Community Plan*.
Local Coastal Program Land Use Plans	
Barrio Logan Community Plan and Local Coastal Program	
Urban Design Element **Policy 4.1.9.** Locate all mechanical equipment, including ground, building and roof-mounted equipment away from public view where possible. 1. Screen views of ground, building and roof- mounted mechanical equipment from adjoining properties and public rights of way with building elements that are consistent with the overall character and design of the building	The Project proposes to convert aboveground utilities to underground utilities throughout the City. Once the new system is functioning, the existing utility poles would be removed, and streets would be repaired from the damages caused during construction. Aboveground transformers, cable boxes, and pedestals will be installed to accommodate and not prevent effective pedestrian circulation, allowing for plantings and street trees along the right of way to the extent feasible. Undergrounding utilities

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facades. Building frontage should not be used for utilities, storage and refuse collection wherever possible. 2. Place utility boxes and access panels underground, or out of the public right-of-way to prevent pedestrian impediments and blank building frontages, and to ensure that sidewalk planting opportunities for street trees and landscape are not limited.	will improve visual resources and enhance the environmental quality of the community. Therefore, the Project would be consistent with the policies in the *Barrio Logan Community Plan and Local Coastal Program*.
La Jolla Community Plan and Local Coastal Program Land Use Plan	
Natural Resources and Open Space System Element **Goal.** Preserve the natural amenities of La Jolla such as its open space, hillsides, canyons, bluffs, parks, beaches, tidepools and coastal waters. **Recommendations** • Place the future installation of utility lines, facilities and equipment underground in any open space areas where feasible and revegetate the disturbed areas with indigenous plants. • Install utility lines and accessory facilities and equipment underground in dedicated parkland and in open space areas. Encourage new and existing development to locate cable, telephone and utility lines underground wherever feasible. Do not obstruct public views to Mount Soledad and to and along the ocean, as identified in Figure 9 and Appendix G, by overhead utility poles that intrude on the views to these natural features from public places.	The Project would be implemented largely within urban, developed areas. If utility undergrounding is proposed within an open space area, SDG&E would provide post-construction improvements to return the site to its original condition, utilizing City standards and regulations. Once conversion of utilities is complete, existing poles would be removed, thus enhancing the natural amenities of the community. Views provided from natural amenities such as open space, hillsides, canyons, bluffs, parks, beaches, tidepools, and coastal waters would be preserved and enhanced. Therefore, the Project would be consistent with the goals and recommendations in the *La Jolla Community Plan and Local Coastal Program Land Use Plan*.
Mission Beach Precise Plan and Local Coastal Program Addendum	
Overall Goal. The enhancement of the overall quality of the physical environment in Mission Beach. **Community Amenities Element**	The Project would include the replacement of aboveground utilities with underground utilities, which would reduce the visual appearance of existing public utilities. Additionally, implementation of the Project

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• To eliminate both visual and non-visual nuisances in Mission Beach. • To enhance the quality of the physical environment of Mission Beach by upgrading the existing community and encouraging attractive development in the future.	would increase public safety within improved areas. The functionality of the systems would remain the same, but the improvement would increase visual and physical quality of improved areas. Therefore, the Project would be consistent with the goals of the *Mission Beach Precise Plan and Local Coastal Program Addendum*.
North City Future Urbanizing Area Framework Plan (San Dieguito)	
Implementing Principles **Policy 4.9c.** Outside the compact communities, the street edge should be designed to retain existing natural features and limit site improvements to landscape elements. • Retain existing landforms, mature trees, and important rock outcroppings. The locations of driveways and utilities should avoid destroying important natural features.	The replacement of aboveground utilities with underground utilities would reduce the visual appearance of existing public utilities. The functionality of the systems would remain the same, but the improvement would increase visual character of improved areas. Additionally, post construction improvements would ensure that curb ramps, streetlights, and landscaping are consistent with existing City standards. Every effort would be made to avoid modification to or removal of existing street trees; however, occasionally a tree must be removed for purposes of worker and public safety. To reduce the impact associated with tree removal on these projects, new street trees would be planted when the City is able to get a property owner to agree to water and care for the tree until it becomes established. Therefore, the Project would be consistent with the principles in the *North City Future Urbanizing Area Framework Plan (San Dieguito)*.
Ocean Beach Community Plan and Local Coastal Program	
Public Facilities, Service, and Safety Element **Policy 5.4.1.** Support the ongoing utility line undergrounding program.	Undergrounding utility improvements are proposed throughout the City. The Project proposes replacement of aboveground utilities with underground utilities. The improvements would follow the alignment of existing utilities, and there would be minimal visual impacts once construction is complete.

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	Therefore, the Project would be consistent with the policies in the *Ocean Beach Community Plan and Local Coastal Program*.
Otay Mesa-Nestor Community Plan and Local Coastal Program	
Natural and Open Space Element **Recommendation**. Improve the appearance of the community through the undergrounding of utilities.	The Project proposes to convert aboveground utilities to underground utilities throughout the City. Once the new system is functioning, the existing utility poles would be removed and streets would be repaired from the damages caused during construction. Undergrounding utilities will improve visual resources and enhance the appearance of the community. Therefore, the Project would be consistent with the recommendations in the *Otay Mesa-Nestor Community Plan and Local Coastal Program*.
Pacific Beach Community Plan and Local Coastal Program Land Use Plan	
Community Facilities and Services Element **Goals** • Improve the community's scenic views and vistas of the beach and bay through a program of undergrounding utilities and maintaining streetscapes that frame, rather than obstruct, views. • SDG&E has a continuing program of undergrounding utilities. In view of its importance as a visitor destination, the City shall urge SDG&E to assign priority status to those areas identified in Figure 18. **Policy 1.** The City shall require the undergrounding of utilities for the approval of major projects in accordance with Council Policy and shall further implement the enhancement of key view corridors, identified by this plan, through underground utility districts.	The replacement of aboveground utilities with underground utilities would reduce the visual appearance of existing public utilities. The functionality of the systems would remain the same, but the improvement would increase visual character of improved areas. Additionally, post-construction improvements would ensure that curb ramps, streetlights, and landscaping are consistent with existing City standards. By undergrounding utilities, the community's scenic views and vistas of the beach and bay would be enhanced. The implementation of proposed activities would occur based on a prioritization system developed by the City and would be implemented as funding allows. The prioritization of undergrounding projects is determined based off greatest public benefit. Therefore, the Project would be consistent with the goals and policies in the *Pacific Beach Community Plan and Local Coastal Program Land Use Plan*.

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Peninsula Community Plan and Local Coastal Program Land Use Plan	
Community Facilities Element **Recommendation.** The process of undergrounding existing utility lines should be encouraged.	Undergrounding utility improvements are proposed throughout the City. The Project proposes replacement of aboveground utilities with underground utilities. The improvements would follow the alignment of existing utilities. Therefore, the Project would be consistent with the recommendations in the *Peninsula Community Plan and Local Coastal Program Land Use Plan*.
San Ysidro Community Plan and Local Coastal Program Land Use Plan	
Public Facilities, Services, and Safety Element **Policy 6.1.18.** Program the undergrounding of telephone and electric power lines to underground all utilities and boxes. **Policy 6.1.19.** Revisit prioritization of undergrounding within the San Ysidro community and coordinate other improvements in the same location.	The proposed activities under the Project would consist of the systematic conversion of overhead utilities to underground throughout the City. The implementation of proposed activities would occur based on a prioritization system developed by the City and would be implemented as funding allows. Therefore, the Project would be consistent with the policies in the *San Ysidro Community Plan and Local Coastal Program Land Use Plan*.
Tijuana River Valley Local Coastal Program Land Use Plan	
Utility **Goal.** To provide adequate public and private utilities to serve the Tijuana River Valley and surrounding communities and region, while respecting the natural characteristics of the area. **Recommendation.** Minimize environmental impacts when planning, designing, locating and constructing all new development for utilities and facilities within or crossing the MHPA. All such activities must avoid disturbing the habitat of MSCP covered species, and wetlands. If avoidance is infeasible, mitigation will be required.	The Project proposes the systematic replacement of aboveground utilities with underground utilities. The functionality of the systems would remain the same, and utilities would continue to serve the Tijuana River Valley and surrounding communities. Once aboveground utilities have been converted to underground utilities, the existing poles would be removed, enhancing the natural characteristics of the area. Projects occurring adjacent to MHPA must adhere to the MHPA Land Use Adjacency Guidelines as outlined in Section 1.4.3 of City's *MSCP Subarea Plan*. Table 5.5.2, which is discussed further in this section, presents the determination of consistency between the

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General, Community, and Park Plan Consistency Evaluation

Goals, Policies, Recommendations	Consistency
	Project and MHPA guidelines. Additionally, with the implementation of **MM-BIO-2** and **MM-BIO-3**, impacts resulting from the projects would be reduced to less than significant. In the event that a project is implemented under the Project and would cause activities to occur that may impact a listed species, field surveys may be conducted to assess the vegetation communities on site and determine if potential impacts would result from pole removal and/or undergrounding activities (including noise). As presented in Table 5.5.2, compliance with, and implementation of the measures within the *MSCP Subarea Plan* would ensure that potential indirect impacts are reduced to below a level of significance. Therefore, the Project would be consistent with the goals and recommendations in the *Tijuana River Valley Local Coastal Program Land Use Plan*.
Torrey Pines Community Plan and Local Coastal Program	
Community Facilities Element **Goal 5.** Underground, where feasible, all above ground power lines, and relocate all power lines out of Los Peñasquitos Lagoon. **Policy 5.** When feasible, underground all above ground utility lines when major street improvements are proposed.	The Project would replace aboveground utilities in the lagoon with underground utilities relocated to the nearby public ROW. Appurtenant structures and improvements would be located in the public ROW, and there would be minimal visual impacts once construction is complete. Therefore, the Project would be consistent with the goals and policies in the *Torrey Pines Community Plan and Local Coastal Program*.
Park Plans	
Balboa Park Master Plan	
Goal. Create within the Park a more pedestrian oriented environment. Reduce automobile and pedestrian conflicts. Minimize through traffic. Preserve, enhance and increase free and open parkland and establish a program of ongoing landscape design, maintenance and replacement.	Implementation of the Project would result in aboveground utilities being converted to underground utilities. Upon completion of conversion, existing utility poles would be removed, reducing pedestrian conflict. The replacement of aboveground utilities with underground utilities would reduce the visual appearance of existing public utilities and

Table 4.5-1
General, Community, and Park Plan Consistency Evaluation

Goals, Policies, Recommendations	Consistency
Architecture and Landscape Design Policies • Enhance major off-site viewpoints, internal viewpoints and views from adjacent neighborhoods. Screen or buffer incompatible uses and views in a timely fashion and in a manner consistent with surrounding landscaping and Park atmosphere. • Maintain and enhance the long established landscape themes of the developed Balboa Park.	preserve the natural characteristics. Additionally, post-construction improvements would ensure that curb ramps, streetlights, and landscaping are consistent with existing City standards. The Project would be implemented largely within urban, developed areas. If utility undergrounding is proposed within an open space area, SDG&E would provide post-construction improvements to return the site to its original condition, utilizing City standards and regulations. Therefore, the Project would be consistent with the goals and policies in the *Balboa Park Master Plan*.
Los Peñasquitos Canyon Preserve Master Plan	
General Concept. The primary objective of the Los Peñasquitos Canyon Preserve should be the preservation and enhancement of its natural land and cultural resources. Recreational and educational use by the public should be a secondary objective. **Recommendation**. The goals of long-range Preserve management should be to maintain and enhance the quality of the environment and to provide for public enjoyment, safety, and education.	The Project proposes to convert aboveground utilities to belowground utilities throughout the City. One of the primary objectives of the Project is to convert overhead utilities to underground when City Council determines it is in the interest of public health, safety, and welfare of the general public. Implementation of the Project would improve public safety, community character, and visual quality, thus enhancing the overall quality of the environment. Therefore, the Project would be consistent with the recommendations in the *Los Peñasquitos Canyon Preserve Master Plan*.
Mission Bay Park Master Plan	
Environment **Goal.** Mission Bay Park should be planned, designed, and managed for long-term environmental health. The highest water quality; sustained biodiversity; ongoing education and research; and the reduction of traffic noise, and air pollution should all be priorities. The Park's natural resources should	The Project proposes the replacement of aboveground utilities with underground utilities. The improvements would follow the alignment of existing utilities, but there would be minimal visual impacts once construction is complete. Implementation of the Project would reduce visible and physical utility improvements at the

Table 4.5-1
General, Community, and Park Plan Consistency Evaluation

Goals, Policies, Recommendations	Consistency
be conserved and enhanced not only to reflect environmental values, but also for aesthetic and recreational benefits.	surface. These improvements would improve public safety and the aesthetic quality of the park's natural resources. Therefore, the Project would be consistent with the goals of the *Mission Bay Park Master Plan*.
Parks Master Plan	
Parks and Programming **Policy PP3.** Incorporate innovative and emerging technology to enhance experiences for residents and visitors.	The Project proposes to convert aboveground utilities to belowground utilities throughout the City. The replacement of aboveground utilities with underground utilities would reduce the visual appearance of existing public utilities, preserving the natural environment of the community. In addition, removing aboveground utility poles and lines would improve public safety. Therefore, the Project would be consistent with the Parks and Programming policies of the *Parks Master Plan*.
Activation **Goal.** Safe and inviting public spaces that support positive experiences for everyone and that further the equity and access goal.	Implementation of the Project would reduce visible and physical utility improvements at the surface. These improvements would improve the public safety of the City's parks and remove large utility poles from existing sidewalks. Therefore, the Project would be consistent with the activation goal of the *Parks Master Plan*.
Art and Culture **Policy AC6.** Ensure local Kumeyaay Tribes are engaged early in the design process of recreational facilities, parks, and open space when the land below the facilities are known to be of significant importance to the Tribes. **Policy AC10.** Consider the Kumeyaay cultural connection to the land and surrounding environment when developing recreational facilities, parks, and open space. **Policy AC13.** Coordinate with Historical Resources Board Staff during the pre-design or design phases for new and renovated parks to	The Project involves the conversion of aboveground utilities to underground. Construction of new utility undergrounding projects and the subsequent removal of overhead utility systems generally consists of trenching or tunneling, cabling, cut-overs, and pole removal. Upon completion of conversion of utility systems, post-undergrounding improvements would be considered. In accordance with Assembly Bill 52, the City has begun consultation with native tribes that are affiliated with the Project's Area of Potential Effect. Outreach letters were sent to Native American representatives to solicit information

Table 4.5-1
General, Community, and Park Plan Consistency Evaluation

Goals, Policies, Recommendations	Consistency
ensure protection and appropriate treatment of historical resources.	concerning tribal cultural resources. To date, one response letter has been received, from the Viejas Band of Kumeyaay Indians, which stated "the project area may contain many sacred sites." Construction activities would potentially cause adverse risks to historical and cultural resources in project areas. As such, the Project would implement **MM-CR-1** to reduce Project impacts to a level that is less than significant. Therefore, the Project would be consistent with the art and culture policies of the *Parks Master Plan*.
Conservation, Sustainability, and Resilience **Goal.** A parks system that preserves and enhances our natural environment, grounded in science-based stewardship, landscape, while making our City more active, biodiverse, and resilient. **Policy CSR18.** Identify and preserve historical, archaeological, and Tribal Cultural resources in a manner consistent with the U.S. Secretary of the Interior's Standards, and pursue opportunities to increase awareness of and access to such resources.	The replacement of aboveground utilities with underground utilities would reduce the visual appearance of existing public utilities, preserving the natural environment of the community. Removing aboveground utility poles and lines would enhance the visual quality of the parks system. Additionally, post-construction improvements would ensure that landscaping is consistent with existing City standards. Implementation of the Project would include construction activities that may disturb historical, archaeological, and tribal cultural resources. Prior to construction, an updated record search would be conducted to identify known cultural resources within the Project's Area of Potential Effect. Additionally, the Project would implement **MM-CR-1** to reduce impacts during construction. Therefore, the Project would be consistent with the conservation, sustainability, and resilience goals and policies of the *Parks Master Plan*.
Operations and Maintenance **Goal.** An efficient, durable, and well-maintained parks system that provides consistent, long-term quality to everyone.	The Project would include the undergrounding of aboveground utilities. Implementation of the Project would include landscaping improvements of the removal of existing utility

Table 4.5-1
General, Community, and Park Plan Consistency Evaluation

Goals, Policies, Recommendations	Consistency
Policy OM4. Reinvest in existing parks and recreation facilities to extend their useful lives, improve operating efficiencies, and enhance the quality of service.	poles, which would enhance the visual quality and safety of the City's parks system. Therefore, the Project would be consistent with the operations and maintenance goal and policies of the *Parks Master Plan*.
San Diego River Park Master Plan	
Objective. Restoring and maintaining a healthy river	The Project would reduce the risk of utility-related pollution and minimizing disruptions to natural water flow during underground activities. Therefore, the Project would be consistent with the objectives of the *San Diego River Park Master Plan.*
Objective. Unifying a healthy habitat	The Project would include the undergrounding of aboveground utilities, which reduces above ground obstructions, promoting a more cohesive habitat for wildlife.
Objective. Creating a connected continuum along the river pathway	The Project would support this by removing overhead utility lines, which can be visual and physical barriers, thus enhancing the aesthetic and functional continuation of the trial.
Objective. Reorienting development toward the river	The Project aligns with this by ensuring that new developments have unobstructed views and access to the river, which enhances the overall riverfront experience.
Sunset Cliffs Natural Park Master Plan	
Objective. Restore areas of neglect and damage to their previous condition and visual quality.	The Project would include the undergrounding of aboveground utilities. Implementation of the Project would include the removal of existing utility poles, which would enhance the visual quality of the park. Therefore, the Project would be consistent with the objectives of the *Sunset Cliffs Natural Park Master Plan*.

A project is considered consistent with the provisions of the identified regional and local plans if it meets the general intent of the plans and would not preclude the attainment of the primary intent

of the land use plan or policy. Therefore, as detailed in Table 4.5-1, the Project is largely consistent with the goals and policies of the General Plan, Community Plans, and other applicable plans, and it would not preclude the attainment of the primary intent of these plans. However, in the event that a specific project implemented under the Project were to preclude the attainment of the primary intent of the plan or policy, the project would be evaluated separately. Therefore, the impact would be **less than significant**.

Issue 3: Would the Project conflict with the provisions of the City's Multiple Species Conservation Program Subarea Plan or other approved local, regional, or state habitat conservation plan?

The majority of work that would be implemented under the Project is located within developed land that does not include land designated as MHPA and therefore would not conflict with the City's adopted *MSCP Subarea Plan* or other approved local, regional, or state habitat conservation plan (including the VPHCP). However, there are some undergrounding projects that include the removal of poles in MHPA-designated land or trenching that is adjacent to MHPA. Utility lines and access roads are conditionally compatible uses within the MHPA. If the pole is inaccessible by truck or located in sensitive habitat, it would be cut at the base, cut into smaller pieces, and removed on foot with no new development or soil disturbance. Therefore, removal of utility lines and poles would also be compatible with the *MSCP Subarea Plan* and VPHCP when performed in conformance with applicable guidelines. Following are the relevant requirements from the "Roads and Utilities – Construction and Maintenance Policies" discussion of Section 1.4.2 of the City's *MSCP Subarea Plan* (City of San Diego 1997):

3. Temporary construction areas and roads, staging areas, or permanent access roads must not disturb existing habitat unless determined to be unavoidable. All such activities must occur on existing agricultural lands or in other disturbed areas rather than in habitat. If temporary habitat disturbance is unavoidable, then restoration of, and/or mitigation for, the disturbed area after project completion will be required.

4. Construction and maintenance activities in wildlife corridors must avoid significant disruption of corridor usage. Environmental documents and mitigation monitoring and reporting programs covering such development must clearly specify how this will be achieved, and construction plans must contain all the pertinent information and be readily available to crews in the field. Training of construction crews and field workers must be conducted to ensure that all conditions are met. A responsible party must be specified.

8. For the most part, existing roads and utility lines are considered a compatible use within the MHPA and therefore will be maintained. Exceptions may occur where underutilized or

> duplicative road systems are determined not to be necessary as identified in the Framework Management Section 1.5.

Undergrounding projects occurring adjacent to MHPA must adhere to the MHPA Land Use Adjacency Guidelines as outlined in Section 1.4.3 of the City's *MSCP Subarea Plan*. Table 4.5-2 presents the determination of consistency between the Project and MHPA guidelines.

As an essential public project, all work within the MHPA that would impact vernal pools would also be required to prepare a wetland deviation, in accordance with Section 4.1.5 (Essential Public Projects) of the VPHCP (City of San Diego 2017d):

> Pursuant to the City's Biology Guidelines and ESL Regulations, Section 143.0510 (d), a wetland deviation, including impacts to vernal pools, may be considered when a proposed project meets all the criteria as outlined under the EPP Option. A wetland deviation would only be required for impacts to vernal pools that occur inside the MHPA.

In the event that the Project would result in a significant impact, the Project would implement Mitigation Measure **(MM) BIO-4, MM-BIO-5, MM-BIO-6a and MM-BIO-6b** to reduce impacts to less than significant.

Additionally, the Project would include construction activities adjacent to vernal pools. However, the Project study area is covered under the VPHCP, as it is a public infrastructure program and would be permitted through the City. The Project would implement VPHCP minimization and avoidance measures and would implement additional measures when construction would occur within 100 feet of a vernal pool (**MM-BIO-7**) to reduce impacts to vernal pools as a result of the Project. As such, the Project would be consistent with the VPHCP.

Table 4.5-2
Project Consistency Determination with Multiple Species Conservation Program Land Use Considerations

Multi-Habitat Planning Area Adjacency Guidelines	Applicability	Implementation
Section 1.4.3 MSCP Subarea Plan – Land Use Adjacency Guidelines		
Drainage		
All new and proposed parking lots and developed areas in and adjacent to the preserve must not drain directly into the MHPA. All developed and paved areas must prevent the release of toxins, chemicals, petroleum products, exotic plant materials and other elements that	No new or proposed parking lots or developed areas are proposed as part of the Project. All impacts are temporary, and the Project would	Appropriate measures would be implemented to prevent runoff of hazardous materials consistent with the City of San Diego (City)

Table 4.5-2
Project Consistency Determination with Multiple Species Conservation Program Land Use Considerations

Multi-Habitat Planning Area Adjacency Guidelines	Applicability	Implementation
might degrade or harm the natural environment or ecosystem processes within the MHPA. This can be accomplished using a variety of methods including natural detention basins, grass swales or mechanical trapping devices. These systems should be maintained approximately once a year, or as often as needed, to ensure proper functioning. Maintenance should include dredging out sediments if needed, removing exotic plant materials, and adding chemical-neutralizing compounds (e.g., clay compounds) when necessary and appropriate.	underground existing aboveground utilities.	Stormwater Standards.
Toxics		
Land uses, such as recreation and agriculture, that use chemicals or generate by-products such as manure, that are potentially toxic or impactive to wildlife, sensitive species, habitat, or water quality need to incorporate measures to reduce impacts caused by the application and/or drainage of such materials into the MHPA. Such measures should include drainage/detention basins, swales, or holding areas with non-invasive grasses or wetland-type native vegetation to filter out the toxic materials. Regular maintenance should be provided. Where applicable, this requirement should be incorporated into leases on publicly owned property as leases come up for renewal.	No hazardous construction materials storage would be allowed that could impact the adjacent Multi-Habitat Planning Area (MHPA) (including fuel or sediment), and any drainage from the construction site must be clear of such materials. Consistent with the City Stormwater Standards, existing previously legal drainage that flows toward the MHPA shall be minimized.	The contractor shall ensure all areas for staging, storage of equipment and materials, trash, equipment maintenance, and other construction related activities are within the limits of the Project. The use of substances that are potentially toxic or impactive to native habitats/flora/fauna within the MHPA would be accompanied by measures consistent with the City's Stormwater Standards to reduce impacts.

Table 4.5-2
Project Consistency Determination with Multiple Species Conservation Program Land Use Considerations

Multi-Habitat Planning Area Adjacency Guidelines	Applicability	Implementation
Lighting		
Lighting of all developed areas adjacent to the MHPA should be directed away from the MHPA. Where necessary, development should provide adequate shielding with non-invasive plant materials (preferably native), berming, and/or other methods to protect the MHPA and sensitive species from night lighting.	No temporary or permanent lighting is currently proposed as part of Project, and no night work is planned.	In the event nighttime lighting is required during construction, any nighttime lighting would be subject to City Outdoor Lighting Regulations per San Diego Land Development Code Section 142.0740 and directed away from the MHPA (**MM-BIO-3**).
Noise		
Uses in or adjacent to the MHPA should be designed to minimize noise impacts. Berms or walls should be constructed adjacent to commercial areas, recreational areas, and any other use that may introduce noises that could impact or interfere with wildlife utilization of the MHPA. Excessively noisy uses or activities adjacent to breeding areas must incorporate noise reduction measures and be curtailed during the breeding season of sensitive species. Adequate noise reduction measures should also be incorporated for the remainder of the year.	Whenever possible, construction activities under the Project would be conducted outside of the breeding season of sensitive wildlife species. If undergrounding is required to be conducted during the breeding season of sensitive wildlife and suitable habitat is present within or adjacent to the utility planned for undergrounding, a protocol survey would be conducted to assess the presence or absence of sensitive species, and appropriate measures will be taken to reduce noise impacts to below 60 A-weighted decibels (dBA) hourly equivalent noise level (L_{eq}) or to the ambient	Surveys, including protocol surveys, may be required for potential impacts to certain avian species during their breeding season: coastal California gnatcatcher (3/1–8/15) western snowy plover (3/1–9/15) cactus wren (2/15–8/15) tricolored black bird (3/1–8/1) burrowing owl (2/1–8/31) California least tern (4/1–9/15) least Bell's vireo (3/15–9/15) southwestern willow flycatcher (5/1–9/1)

Table 4.5-2
Project Consistency Determination with Multiple Species Conservation Program Land Use Considerations

Multi-Habitat Planning Area Adjacency Guidelines	Applicability	Implementation
	noise level if noise levels already exceed 60 dBA hourly L_{eq}.	Ridgway's rail (3/15–8/15) Additionally, Project construction activities would implement noise reduction measures included in Mitigation Measure **(MM) BIO-1**, **MM-BIO-3** and **MM-BIO-5**.
Barriers		
New development adjacent to the MHPA may be required to provide barriers (e.g., non-invasive vegetation, rocks/boulders, fences, walls, and/or signage) along the MHPA boundaries to direct public access to appropriate locations and reduce domestic animal predation.	No permanent barriers or new development are required or proposed under the Project. All impacts would be temporary and previously aboveground utilities would be moved underground, such that no new public access would be created.	Not applicable.
Invasives		
No invasive non-native plant species shall be introduced into areas adjacent to the MHPA.	Any plant species installed within 200 feet of the MHPA as part of revegetation work shall comply with the Landscape Regulations (Land Development Code Section 142.0400 and per Table 142-04F, Revegetation and Irrigation Requirements) and be non-invasive.	The City shall remove all non-native plant species when feasible and permanently revegetate all graded, disturbed, or eroded areas using native species, suitable for the location (**MM-BIO-1** through **MM-BIO-3**).
Brush Management		
New residential development located adjacent to and topographically above the MHPA (e.g., along canyon edges) must be set back from slope edges to incorporate	The Project is not a structural development and would not create any	Not applicable.

Table 4.5-2
Project Consistency Determination with Multiple Species Conservation Program Land Use Considerations

Multi-Habitat Planning Area Adjacency Guidelines	Applicability	Implementation
Zone 1 brush management areas on the development pad and outside of the MHPA. Zones 2 and 3 will be combined into one zone (Zone 2) and may be located in the MHPA upon granting of an easement to the City (or other acceptable agency) except where narrow wildlife corridors require it to be located outside of the MHPA. Zone 2 will be increased by 30 feet, except in areas with a low fire hazard severity rating where no Zone 2 would be required. Brush management zones will not be greater in size that is currently required by the City's regulations. The amount of woody vegetation clearing shall not exceed 50 percent of the vegetation existing when the initial clearing is done. Vegetation clearing shall be done consistent with City standards and shall avoid/minimize impacts to covered species to the maximum extent possible. For all new development, regardless of the ownership, the brush management in the Zone 2 area will be the responsibility of a homeowners association or other private party. For existing project and approved projects, the brush management zones, standards and locations, and clearing techniques will not change from those required under existing regulations.	new brush management zones.	
Grading/Land Development		
Manufactured slopes associated with site development shall be included within the development footprint for projects within or adjacent to the MHPA.	No manufactured slopes are proposed or associated with the Project.	In the event manufactured slopes are proposed, the Project would be subject to San Diego Land Development Code Section 142.0101.

Table 4.5-2
Project Consistency Determination with Multiple Species Conservation Program Land Use Considerations

Multi-Habitat Planning Area Adjacency Guidelines	Applicability	Implementation
Section 1.5.2 MSCP Subarea Plan – General Management Directives		
Mitigation		
Mitigation, when required as part of project approvals, shall be performed in accordance with the City of San Diego Environmentally Sensitive Lands Ordinance and Biology Guidelines.	Mitigation would be implemented according to the ratios described in the City of San Diego Environmentally Sensitive Lands Ordinance and Biology Guidelines, as well as according to the requirements described in any permits issued by the resource agencies.	Mitigation ratios and associated mitigation measures proposed for impacts to sensitive vegetation and jurisdictional aquatic resources are described in Section 4.2, Biological Resources, and would be implemented according to **MM-BIO-6a** and **MM-BIO-6b**.
Restoration		
Restoration or revegetation undertaken in the MHPA shall be performed in a manner acceptable to the City. Where Covered Species status identifies the need for reintroduction and/or increasing the population, the Covered Species will be included in restoration/revegetation plans, as appropriate. Restoration or revegetation proposals will be required to prepare a plan that includes elements addressing financial responsibility, site preparation, planting specifications, maintenance, monitoring and success criteria, and remediation and contingency measures. Wetland restoration/revegetation proposals are subject to permit authorization by federal and state agencies.	The Project could temporarily displace native habitats, including wetlands, as well as developed land and ornamental vegetation. Following construction completion, the temporarily impacted areas will be revegetated and restored in place.	A revegetation plan will be prepared prior to implementation of construction and will include the following, in accordance with the San Diego Municipal Code, San Diego Biological Guidelines, and the Land Development Code—Landscape Standards. Revegetation and/or restoration plans will be prepared for each district, as directed by the qualified monitoring biologist based on the temporary impacts proposed, and will feature native species

Table 4.5-2
Project Consistency Determination with Multiple Species Conservation Program Land Use Considerations

Multi-Habitat Planning Area Adjacency Guidelines	Applicability	Implementation
		that are suitable for the location as well as erosion control features including silt fence and straw fiber rolls, where appropriate. The qualified monitoring biologist shall identify and adequately document all pertinent information concerning the revegetation goals and requirements, such as but not limited to, plant/seed palettes, timing of installation, plant installation specifications, method of watering, protection of adjacent habitat, erosion and sediment control, performance/success criteria, inspection schedule by City staff, document submittals, and reporting schedule. The revegetation areas will be monitored and maintained for 25 months to ensure adequate establishment and sustainability of the plantings/seedlings.

Table 4.5-2
Project Consistency Determination with Multiple Species Conservation Program Land Use Considerations

Multi-Habitat Planning Area Adjacency Guidelines	Applicability	Implementation
		Restoration plans may require 5-years of long-term maintenance and monitoring.

In the event that a project is implemented under the Project and would cause activities to occur that may impact a listed species, field surveys may be conducted to assess the vegetation communities and sensitive species on site and determine if potential impacts would result from pole removal and/or undergrounding activities (including noise). As presented in Table 4.5-2, compliance with, and implementation of the measures within the *MSCP Subarea Plan* would ensure that potential indirect impacts are reduced to below a level of significance. In addition, the Project would implement mitigation measures (**MM-BIO-1**, **MM-BIO-2**, **MM-BIO-3**, **MM-BIO-4**, **MM-BIO-5**, **MM-BIO-6a**, **MM-BIO-6b**, and **MM-BIO-7**) to reduce potential impacts to the MHPA. As a result, the Project would not conflict with the provisions of any natural community conservation plan or habitat conservation plan.

4.5.7 SIGNIFICANCE OF IMPACTS

Issue 1

Utility lines are standard infrastructure within any city and essential to provide modern conveniences. No deviation or variance is anticipated. Impacts would be **less than significant.**

Issue 2

A project is considered consistent with the provisions of the identified regional and local plans if it meets the general intent of the plans and would not preclude the attainment of the primary intent of the land use plan or policy. Therefore, as detailed in Table 4.5-1, the Project is largely consistent with the goals and policies of the General Plan (Blueprint SD), Community Plans, VPHCP, and other applicable plans, and it would not preclude the attainment of the primary intent of these plans. Impacts would be **less than significant**.

Issue 3

As presented in Table 4.5-2, compliance with and implementation of the measures within the *MSCP Subarea Plan* and implementation of **MM-BIO-1**, **MM-BIO-2**, and **MM-BIO-3** would ensure that potential indirect impacts are reduced to below a level of significance. As a result, the Project would not conflict with the provisions of any natural community conservation plan or habitat conservation plans (including the VPHCP). Furthermore, implementation of the Project would be consistent with state regulations and the City's Master Plan. Impacts would be **less than significant.**

4.5.8 MITIGATION, MONITORING, AND REPORTING

Impacts would be less significant. However, for consistency, the following mitigation measures are incorporated: **MM-BIO-1, MM-BIO-2, MM-BIO-3, MM-BIO-4, MM-BIO-5, MM-BIO-6a, MM-BIO-6b,** and **MM-BIO-7** (see Section 4.2, Biological Resources), and **MM-CR-1** (see Section 4.4, Historical, Archaeological, and Tribal Cultural Resources).

4.5.9 SIGNIFICANCE AFTER MITIGATION

Impacts related to land use would be **less than significant**.

4.6 NOISE

4.6.1 INTRODUCTION

This section describes the existing noise setting of the City of San Diego (City) Utilities Undergrounding Program (Project); identifies the applicable regulatory framework; evaluates potential impacts associated with noise and vibration that could result from the Project; identifies mitigation measures, if necessary, to reduce the level of impact associated with implementation of the Project; and identifies the level of significance after mitigation. Information in this section is from applicable environmental plans, including the *City of San Diego General Plan*, the San Diego Municipal Code (SDMC), and Community Plans. Details of the construction noise and ground-borne vibration exposure levels that form the basis of this quantitative assessment can be found in Appendix F.

4.6.2 EXISTING CONDITIONS

4.6.2.1 Noise Definitions and Criteria

The following subsections define relevant acoustical metrics and terminology.

Sound, Noise, and Acoustics

Sound is a process that consists of three components: the sound source, the sound path, and the sound receiver. All three components must be present for sound to exist. Without a source to produce sound, there is no sound. Similarly, without a medium to transmit sound pressure waves, there is no sound. Finally, sound must be received; a hearing organ, sensor, or object must be present to perceive, register, or be affected by sound or noise. In most situations, there are many different sound sources, paths, and receptors rather than just one of each. Acoustics is the field of science that deals with the production, propagation, reception, effects, and control of sound. Noise is defined as sound that is loud, unpleasant, unexpected, or undesired.

Sound Pressure Levels and Decibels

The amplitude of a sound determines its loudness. Loudness of sound increases with increasing amplitude. Sound pressure amplitude is measured in units of micronewton per square meter, also called micropascal. One micropascal is approximately one-hundred billionth (0.00000000001) of normal atmospheric pressure. The pressure of a very loud sound may be 200 million micropascals, or 10 million times the pressure of the weakest audible sound. Because expressing sound levels in terms of micropascal would be very cumbersome, sound pressure level in logarithmic units is used instead to describe the ratio of actual sound pressure to a reference pressure squared. These units are called bels. To provide a finer resolution, a bel is subdivided into 10 decibels (dB).

A-Weighted Sound Level

Sound pressure level alone is not a reliable indicator of loudness. The frequency, or pitch, of a sound also has a substantial effect on how humans will respond. Although the intensity (energy per unit area) of the sound is a purely physical quantity, the loudness, or human response, is determined by the characteristics of the human ear.

Human hearing is limited not only in the range of audible frequencies, but also in the way it perceives the sound in that range. In general, the healthy human ear is most sensitive to sounds between 1,000 and 5,000 hertz, and it perceives a sound within that range as more intense than a sound of higher or lower frequency with the same magnitude. To approximate the frequency response of the human ear, a series of sound level adjustments is usually applied to the sound measured by a sound level meter. The adjustments (referred to as a weighting network) are frequency dependent.

The A-scale weighting network approximates the frequency response of the average young ear when listening to ordinary sounds. When people make judgments about the relative loudness or annoyance of a sound, their judgments correlate well with the A-scale sound levels of those sounds. Other weighting networks have been devised to address high noise levels or other special situations (e.g., *C*-scale), but these scales are rarely used in conjunction with most environmental noise. Noise levels are typically reported in terms of A-weighted sound levels. All sound levels discussed in this report are A-weighted decibels (dBA). Examples of typical noise levels for common indoor and outdoor activities are depicted in Table 4.6-1.

Table 4.6-1
Typical Sound Levels in the Environment and Industry

Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
Jet fly over at 300 meters (1,000 feet)	110	Rock band
Gas lawn mower at 1 meter (3 feet)	100	Food blender at 1 meter (3 feet)
Diesel truck at 15 meters (50 feet) at 80 kilometers per hour (50 miles per hour)	90	Garbage disposal at 1 meter (3 feet)
Noisy urban area, daytime	80	Vacuum cleaner at 3 meters (10 feet)
Gas lawn mower at 30 meters (100 feet)	70	Normal speech at 1 meter (3 feet)
Commercial area	60	Large business office
Heavy traffic at 90 meters (300 feet)	50	Dishwasher next room
Quiet urban, daytime	40	Theater; large conference room (background)
Quiet urban, nighttime	30	Library
Quiet suburban, nighttime	20	Bedroom at night; concert hall (background)

Table 4.6-1
Typical Sound Levels in the Environment and Industry

Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
Quiet rural, nighttime	10	Broadcast/recording studio
Lowest threshold of human hearing	0	Lowest threshold of human hearing

Source: Caltrans 2009.
Note: dBA = A-weighted decibel.

Human Response to Changes in Noise Levels

Under controlled conditions in an acoustics laboratory, the trained, healthy human ear can discern changes in sound levels of 1 dBA when exposed to steady, single-frequency signals in the mid-frequency range. Under outside controlled conditions, the trained ear can detect changes of 2 dBA in normal environmental noise. It is widely accepted that the average healthy ear, however, can barely perceive noise level changes of 3 dBA. A change of 5 dBA is readily perceptible, and a change of 10 dBA is perceived as twice or half as loud. A doubling of sound energy results in a 3 dBA increase in sound, which means that a doubling of sound energy (e.g., doubling the volume of traffic on a road) would result in a barely perceptible change in sound level).

Noise Descriptors

Additional units of measure have been developed to evaluate the long-term characteristics of sound. The equivalent sound level (L_{eq}) is also referred to as the time-averaged or energy-averaged sound level. It is the equivalent steady-state sound level that in a stated period of time would contain the same acoustical energy as the time-varying sound level during the same time period. For instance, the 1-hour A-weighted equivalent sound level, $L_{eq(1h)}$, is the energy average of the A-weighted sound levels occurring during a 1-hour period and is the basis for the City's noise ordinance criteria for non-construction noise per SDMC Section 59.5.0401(a). The time-averaging period can be longer, such as the City of San Diego's 12-hour L_{eq} construction noise threshold of 75 dBA.

The day-night sound level (L_{dn}) and Community Noise Equivalent Level (CNEL) are other common descriptors but are based upon the energy-averaging of 24 successive hourly sound levels. But unlike a 24-hour L_{eq} value, these metrics apply dB adjustments to certain time periods as follows and yield higher overall values: L_{dn} applies a +10 dB "penalty" to hours between 10 p.m. and 7 a.m.; CNEL also applies this +10 dB nighttime penalty and a +5 dB penalty to the three evening hours between 7 p.m. and 10 p.m. Although resulting in slightly different overall values, L_{dn} and CNEL are often considered comparable for purposes of environmental noise impact assessment.

Sound Propagation

Sound propagation (i.e., the passage of sound from a noise source to a receiver) is influenced by geometric spreading, ground absorption, atmospheric effects, and shielding by natural and/or built features.

Sound levels attenuate (or diminish) at a rate of approximately 6 dBA per doubling of distance from an outdoor point source due to the geometric divergence or "spreading" of the sound waves. Atmospheric conditions such as humidity, temperature, and wind gradients introduce further effects that may temporarily increase or decrease sound levels at a receptor position. In general, the greater the distance the receiver is from the source, the greater the potential for variation in sound levels due to these atmospheric effects. Additional sound attenuation can result from built features such as intervening walls and buildings, and by natural features such as path-occluding hills and wide, dense expanses of forested ground cover.

Ground-borne Vibration Fundamentals

Ground-borne vibration is a small, rapidly oscillating motion transmitted through the ground. The strength of ground-borne vibration attenuates rapidly over distance. Some soil types transmit vibration quite efficiently; other types (primarily sandy soils) do not. Several basic measurement units are commonly used to describe the intensity of ground vibration. The primary descriptor used by the California Department of Transportation (Caltrans) is peak particle velocity (PPV) expressed in units of inches per second (ips). The calculation to determine PPV at a given distance is as follows from the Caltrans *Transportation and Construction Vibration Guidance Manual* (Caltrans 2020):

$$PPV_{dist} = PPV_{ref} * (25/D)^{\wedge 1.1}$$

Where: PPV_{dist} = the PPV in ips of the equipment adjusted for distance; PPV_{ref} = the reference vibration level in ips at 25 feet; and D = the distance from the equipment to the receiver.

Caltrans guidance applies this PPV velocity-based parameter (instead of acceleration or displacement) for assessment of potential building damage risk and building occupant annoyance when exposed to groundborne vibration propagation from construction activities.

4.6.2.2 Existing Noise

Given the wide geographical area across the city encompassed by the Project, the existing outdoor ambient noise environments are varied. In general, the Project area mainly consists of urban and suburban land uses where the transition from overhead utility lines to underground utilities has

been previously implemented or is planned for the future. The noise environments through most of the Project area are characterized by a "background" noise level generated by vehicular traffic on both near and distant roadways. Such noise is often the audibly dominant, persistent, or otherwise considered "primary" acoustical contributor to the outdoor sound environment. Typical secondary noise sources include distant aircraft, rustling leaves, landscaping maintenance, construction noise, birds, children playing, and passing conversations.

Noise-Sensitive Land Uses

Noise-sensitive land uses (NSLUs) are land uses where human activity may be adversely affected by noise—especially where people are normally expected to sleep. Examples of NSLUs are residences, hotels and motels, educational institutions, libraries, and hospitals and clinics.

Estimated Existing Noise Levels

By way of the 2018 *Transit Noise and Vibration Impact Assessment Manual*, FTA has offered guidance on estimating existing outdoor ambient sound level due to proximity to roadways and rail, or based on an approximation formula with population density as the input parameter (FTA 2018). For example, the former of these techniques predicts that daytime L_{eq} can be 55 dBA at a distance of 800 feet to an interstate highway and 75 dBA at a distance of 50 feet. Similar estimates are offered by FTA with respect to receptor proximity to operating railroads, parkways, and arterial roads. Previously conducted outdoor ambient sound level surveys for the City, exhibited in a variety of published project studies that are publicly available, show daytime L_{eq} values that are generally consistent with these estimates but also account for other acoustical contributors to the measured environment at a specific surveyed location.

Utilizing a combination of data from the aforementioned FTA guidance, Table 4.6-2 provides a matrix from which the outdoor ambient sound level, expressed as L_{dn} (which, for purposes of this assessment, are considered equivalent to a CNEL value) can be estimated. The values in Table 4.6-2 are not merely reproduced values that appear in Table 4-17 of the FTA guidance manual; rather, they represent the logarithmic summation of these sound level estimates from each of the two techniques (i.e., proximity to roadway or rail and the vicinity population density).

Table 4.6-2
Estimated Outdoor Ambient Sound Level (dBA, CNEL) per Federal Transit Administration Guidance

Perpendicular Distance between Receptor and Surface Transportation Source	Population Density (people per square mile) in Vicinity of Undergrounding Projects Implemented under the Project			
Distance to Interstate Highway[a,b]	*300–1,000*	*1,000–3,000*	*3,000–10,000*	*10,000–30,000*
10–50 feet	75	75	75	75

Table 4.6-2
Estimated Outdoor Ambient Sound Level (dBA, CNEL) per Federal Transit Administration Guidance

Perpendicular Distance between Receptor and Surface Transportation Source	Population Density (people per square mile) in Vicinity of Undergrounding Projects Implemented under the Project			
Distance to Interstate Highway[a,b]	*300–1,000*	*1,000–3,000*	*3,000–10,000*	*10,000–30,000*
50–100 feet	70	70	70	70
100–200 feet	65	65	65	65
200–400 feet	60	60	60	60
400–800 feet	55	55	55	60
800 or more feet	50	50	55	60
Parkway (55 mph) or City Streets (30 mph)[a,c]				
10–50 feet	70	70	70	70
50–100 feet	65	65	65	65
100–200 feet	60	60	60	60
200–400 feet	55	55	55	60
400 or more feet	50	50	55	60
Railway[a,d]				
10–30 feet	75	75	75	75
30–60 feet	70	70	70	70
60–120 feet	65	65	65	65
120–240 feet	60	60	60	60
240–500 feet	55	55	55	60
500–800 feet	50	50	55	60
800 or more	45	50	55	60

Source: FTA 2018.

Notes: dBA = A-weighted decibel; CNEL = Community Noise Equivalent Level; mph = miles per hour.

[a] Distances do not include shielding from intervening rows of buildings.

[b] Roadways with four or more lanes that permit trucks, with traffic at 60 mph.

[c] Parkways with traffic at 55 mph, but without trucks, and city streets with the equivalent of 75 or more heavy trucks per hour and 300 or more medium trucks per hour at 30 mph.

[d] Main line railroad corridors typically carrying 5–10 trains per day at speeds of 30–40 mph.

As an example, if an undergrounding project under the Project were to occur within the Sorrento Valley area (and having U.S. Postal Service zip code of 92121), online resources indicate that the population density is 313 people per square mile (ZipAtlas 2019), which FTA guidance would suggest results in a relatively quiet outdoor ambient sound level (45 dBA CNEL) when highways, parkways, and rail transportation routes are very far away. But if the project area was approximately 200–400 feet from Interstate 5, then FTA guidance suggests that the estimated outdoor ambient sound level would be at least 60 dBA CNEL. FTA guidance also suggests that published airport noise contours

should be consulted, which may show outdoor ambient sound in a project near an airport or airfield is actually much higher than what the values in Table 4.6-2 suggest.

4.6.3 REGULATORY SETTING

There are no applicable federal or state regulations related to noise and vibration that would apply to the Project. However, FTA offers guidance criteria for the assessment of construction noise at commercial and industrial receiving land uses, as well as ground-borne vibration standards with respect to building damage risk. Because undergrounding projects approved and implemented under the Project would be located almost entirely within the City of San Diego, the City's applicable regulations and relevant planning guidelines are described in this section.

City of San Diego Noise Ordinance

SDMC Section 59.5.0401 sets forth sound level limits. It is unlawful for any person to cause noise by any means to the extent that the 1-hour average sound level exceeds the applicable limit given in the following table (Table 4.6-3) at any location in the City on or beyond the boundaries of the property on which the noise is produced. The noise subject to these limits is the part of the total noise at the specified location that is due solely to the action of said person/event.

Table 4.6-3
City of San Diego Sound Level Limits

Land Use	Time of Day	1-Hour Average Sound Level (dBA)
Single-family residential	7 a.m. to 7 p.m.	50
	7 p.m. to 10 p.m.	45
	10 p.m. to 7 a.m.	40
Multifamily residential (up to a maximum density of 1/2,000)	7 a.m. to 7 p.m.	55
	7 p.m. to 10 p.m.	50
	10 p.m. to 7 a.m.	45
All other residential	7 a.m. to 7 p.m.	60
	7 p.m. to 10 p.m.	55
	10 p.m. to 7 a.m.	50
Commercial	7 a.m. to 7 p.m.	65
	7 p.m. to 10 p.m.	60
	10 p.m. to 7 a.m.	60
Industrial or agricultural	Any time	75

Source: City of San Diego 2019.
Notes: dBA = A-weighted decibel.

SDMC Section 59.5.0404 sets forth limitations related to construction noise (City of San Diego 2019).

A. It shall be unlawful for any person, between the hours of 7:00 p.m. of any day and 7:00 a.m. of the following day, or on legal holidays as specified in Section 21.0104 of the San Diego Municipal Code, with exception of Columbus Day and Washington's Birthday, or on Sundays, to erect, construct, demolish, excavate for, alter or repair any building or structure in such a manner as to create disturbing, excessive or offensive noise unless a permit has been applied for and granted beforehand by the Noise Abatement and Control Administrator. In granting such permit, the Administrator shall consider whether the construction noise in the vicinity of the proposed work site would be less objectionable at night than during the daytime because of different population densities or different neighboring activities; whether obstruction and interference with traffic particularly on streets of major importance, would be less objectionable at night than during the daytime; whether the type of work to be performed emits noises at such a low level as to not cause significant disturbances in the vicinity of the work site; the character and nature of the neighborhood of the proposed work site; whether great economic hardship would occur if the work were spread over a longer time; and whether proposed night work is in the general public interest; and he shall prescribe such conditions, working times, types of construction equipment to be used, and permissible noise levels as he deems to be required in the public interest.

B. Except as provided in subsection C. hereof, it shall be unlawful for any person, including The City of San Diego, to conduct any construction activity so as to cause, at or beyond the property lines of any property zoned residential, an average sound level greater than 75 decibels during the 12-hour period from 7:00 a.m. to 7:00 p.m.

C. The provisions of subsection B. of this section shall not apply to construction equipment used in connection with emergency work, provided the Administrator is notified within 48 hours after commencement of work.

City of San Diego Significance Determination Thresholds

Under Section K.6, the City's *California Environmental Quality Act (CEQA) Significance Determination Thresholds* (City of San Diego 2022) refer to the aforementioned noise ordinance requirements for assessing potential temporary construction noise impacts at residential receptors. Additionally, consideration of non-residential but potentially noise-sensitive receptors is stated in Section K.6 as follows: "where temporary construction noise would substantially interfere with normal business communication, or affect sensitive receptors, such as day care facilities, a significant noise impact

may be identified." To evaluate potentially significant impacts at such sensitive receptors that are not zoned as residential land uses, and in a manner akin to the assessment of construction noise exposures as presented in other project studies under City jurisdiction or in deference to its standards as guidance, such as was done in the *University of California San Diego 2019 Long Range Development Plan (Hillcrest Campus)*, the assessment herein adopts the same 75 dBA 12-hour L_{eq} quantitative threshold for construction noise.

Caltrans Guidance

With respect to continuous/frequent intermittent vibration sources (e.g., typical construction activities), the aforementioned Caltrans guidance manual suggests ground-borne vibration exposure limits (inches per second [ips] PPV) that depend on the building type or "structure and condition" as follows (Caltrans 2020):

I. Extremely fragile historic buildings, ruins, ancient monuments – 0.08 ips
II. Fragile buildings – 0.1 ips
III. Historic and some old buildings – 0.25 ips
IV. Older residential structures – 0.3 ips
V. New residential structures – 0.5 ips
VI. Modern industrial/commercial buildings – 0.5 ips

Most single-family homes would resemble the fourth (IV) category (older residential structures), and most historic resources should be considered the third (III) type (historic and some old buildings). For purposes of assessment conservatism, the second (II) category (fragile buildings) could apply to historic resources that may be considered fragile and for which the most stringent threshold would apply with respect to receiving ground-borne vibration from implementation of Project activities.

4.6.4 THRESHOLDS OF SIGNIFICANCE

Thresholds used to evaluate potential impacts related to noise and vibration are based on applicable criteria in the City's *CEQA Significance Determination Thresholds* (2022) and CEQA Guidelines Appendix G. Thresholds are modified from the City's *CEQA Significance Determination Thresholds* and CEQA Guidelines Appendix G and provide guidance to determine potential significance for noise and vibration impacts. A significant noise or vibration impact could occur if implementation of the Project would:

Issue 1: Result in or create a significant increase in the existing ambient noise level

Issue 2: Result in the exposure of people to noise levels which exceed the City's adopted noise ordinance or are incompatible with Table K-4 of the City's *CEQA Significance Determination Thresholds*?

Issue 3: Result in the exposure of people to current or future transportation noise levels which exceed standards established in the Transportation Element of the General Plan or an adopted airport Comprehensive Land Use Plan

Issue 4: Result in the exposure of persons to or generation of excessive ground-borne vibration or ground-borne noise levels?

Issue 5: Result in land uses which are not compatible with aircraft noise levels as defined by an adopted airport Comprehensive Land Use Plan (CLUP).

With respect to ground-borne vibration propagation generated by construction equipment activity and thus having the potential to create a significant impact (Issue 4), Caltrans guidance thresholds for architectural damage risk (e.g., 0.1 PPV for fragile or historical resources, 0.3 PPV for older residential structures, and 0.5 PPV for newer residential structures or modern industrial/commercial buildings as listed in Section 4.6.3, Regulatory Setting) will be utilized as impact significance criteria. For building occupant annoyance, Caltrans guidance suggests exposure to 0.2 ips PPV of continuous-type vibration would be "annoying" (Caltrans 2020) and will thus be used for that assessment of impact significance.

Issue No. 5 is addressed in Chapter 6, Effects Found Not to be Significant.

4.6.5 APPROACH AND METHODOLOGY

Construction Noise Modeling

The noise assessment technique in this section quantitatively predicts construction noise generation for each sequential construction phase and the resulting noise levels at distances within which NSLUs in the vicinity of the Project would likely be adversely affected. Assumptions regarding construction activities, construction equipment, and duration of construction activities are based on information provided by the City, similar projects, and reference data from the *FHWA Roadway Construction Noise Model User's Guide* (FHWA 2006). Anticipated quantities and types of equipment, as shown in Chapter 3, Project Description, reflect the City's description of the Project's expected construction activities. Typical duty cycles of construction equipment, which are expressed as "acoustical usage factor" by the Roadway Construction Noise Model, represent reference data from FHWA.

For purposes of this programmatic-level analysis, the construction noise level for each of the six distinct and sequential construction phases was estimated by calculating the aggregate L_{eq} over a 12-hour time-averaging period (noise modeling provided as Appendix F), so that estimated noise levels could be compared with the City's noise ordinance thresholds and estimates of pre-existing outdoor ambient sound levels. Conservatively, and in a manner comparable to what FTA guidance considers "detailed assessment" of construction noise, the aggregate or total L_{eq} for each phase assumes that all expected equipment types and their on-site quantities (consistent with those described in Chapter 3) are operating for some period of time within an 8-hour construction shift (i.e., 7:30 a.m. to 4:00 p.m., assuming a half-hour break within) and are, on average, equidistant from a hypothetical noise-sensitive receptor.

Specifications of each undergrounding project implemented under the Project would vary depending on the subject site characteristics and needs; however, requirements for the construction phases of each undergrounding project are not expected to differ substantially from what has been detailed in Chapter 3. Although all project-level activities implemented under the Project may slightly differ from the exact scenario analyzed in this Program EIR (PEIR), the modeled representative project and estimated maximum noise levels included herein would represent a conservative assessment of noise impacts associated with anticipated Project implementation at an undergrounding project study area.

Vibration Standards

Section 4.6.3 summarizes standards from the Caltrans *Transportation and Construction Vibration Guidance Manual* (Caltrans 2020) that were used herein to assess potential impact (i.e., building damage risk) to receiving structures. As for the occupants potentially within these structures, the Caltrans guidance also indicates that a PPV of 0.2 ips would be considered "annoying" (Caltrans 2020) and thus represents an appropriate annoyance-based impact threshold for purposes of this Project assessment.

Operation

No operational (i.e., long-term fixed location) noise emissions are anticipated. Since implementation of the Project would involve the undergrounding of existing utility lines, no new development or land uses are proposed. The Project does not include any long-term development or operational equipment. Therefore, no operational noise would be created as a result of implementation of the Project.

4.6.6 IMPACTS

Issue 1: Would the Project result in or create a significant increase in the existing ambient noise level?

Impact Threshold

Based on the City's *CEQA Significance Determination Thresholds* (City of San Diego 2022), a project would have a potentially significant noise impact if it would result in the following:

- Generation of noise levels that exceed the City's adopted Noise Ordinance, SDMC Section 59.5.0404 (i.e., 75 dBA L_{eq} [12-hour]). Additionally, construction noise that would substantially interfere with normal business communications or affect sensitive receptors may be significant per the City's *CEQA Significance Determination Thresholds* (City of San Diego 2022).
- Exposure of people to noise levels that exceed the City's adopted Noise Ordinance, SDMC Section 59.5.0401.
- An increase in transportation noise by 3 dB that results in the exposure of people to transportation noise levels that exceed the General Plan Noise Element land use-noise compatibility guidelines.

Analysis

Construction

In general, construction noise would be short-term and intermittent, with noise-generating activities moving along undergrounding project alignments, such that construction activities would not be in close proximity to any one specific noise-sensitive receptor for a prolonged period of time and would not typically result in a prolonged substantial increase in ambient noise levels. However, for the purposes of this PEIR, potential construction noise of undergrounding projects was conservatively calculated.

Table 4.6-4 presents for each of the six noise-producing construction phases a set of estimated activity-to-receptor minimum horizontal distances needed to attain the indicated L_{eq} dB thresholds corresponding with the type of receiving land use on which a sensitive receptor may be located: residential, commercial, or industrial. For all three, the City's 75 dBA 12-hour L_{eq} standard for construction noise is the applied threshold. Construction activity due to Project implementation taking place at a distance less than that indicated in Table 4.6-4 with respect to a receptor position would result in higher noise emission levels that would exceed the relevant threshold and thus, under such circumstances, require mitigation. As a result, construction noise impacts for activities implemented under the Project would be **potentially significant** without mitigation (see **Mitigation Measure [MM] NOI-1**).

Note that while the noise exposure level attributed to implementation of the Project at a receiving land use may be compliant with these fixed-value thresholds, it may be at a magnitude that is either less than, comparable to, or greater than the existing outdoor ambient sound level as estimated by Table 4.6-2 or as might be measured prior to Project implementation. Consistent with what is summarized in Section 4.6.2.1, Noise Definitions and Criteria, if the construction noise level is at least 3 dB greater than the pre-Project ambient level, it would be a barely perceptible change; 5 dB greater would be readily perceptible, and 10 dB greater would be a noticeable "doubling" of perceived outdoor sound level. Although such potential increases above the existing outdoor ambient sound level at a receiving land use are possible under the right conditions, they would be temporary and conclude upon completion of the Project activity being implemented.

Table 4.6-4
Estimated Average Receptor-to-Activity Distance (feet) within which Anticipated Construction Noise would Exceed Indicated Threshold

Construction Phase for Typical Undergrounding Project Implemented under the Project	Residential (75 dBA 12-hour L_{eq})[a]	Commercial (75 dBA 12-hour L_{eq})[b]	Industrial (75 dBA 12-hour L_{eq})[b]
Trenching/Boring/Conduit	90	90	90
Cabling and Connection	35	35	35
Cut-Overs	35	35	35
Removal of Overhead Utilities	65	65	65
Post-Undergrounding Improvements	160	160	160
Street Restoration	120	120	120

Source: Appendix F.
Notes: dBA = A-weighted decibel; L_{eq} = equivalent sound level.
[a] Per City of San Diego Noise Ordinance, SDMC Section 59.5.0404.b.
[b] Applying same San Diego Noise Ordinance, SDMC Section 59.5.0404.b threshold for potential sensitive receptors within these non-residential land use types and zones.

Operation

Implementation of the Project would not result in any long-term development or substantial aboveground noise-generating equipment. No permanent substantial increase in ambient noise levels would occur; thus, long-term operational impacts from Project implementation would be **less than significant**.

Issue 2: Would the Project result in the exposure of people to noise levels which exceed the City's adopted noise ordinance or are incompatible with Table K-4 of the City's *CEQA Significance Determination Thresholds*?

Analysis

Table K-4 from the City's *CEQA Significance Determination Thresholds* is primarily a planning tool to ensure long-term compatibility of various land uses. As discussed under Issue 1, Operation, the proposed Project would not result in any long-term development, operational equipment, or new employees. Therefore, no operational noise would be created, and the proposed Project would be compatible with the standards in Table K-4. Impacts would be **less than significant**.

Issue 3: Result in the exposure of people to current or future transportation noise levels which exceed standards established in the Transportation Element of the General Plan or an adopted airport Comprehensive Land Use Plan?

Analysis

The Project entails installation of underground utilities that, upon completion, would not cause a change to surface transportation or aviation traffic routes; therefore, there would be **no impacts** relating to this assessment criterion.

Issue 4: Would the Project result in the exposure of persons to or generation of excessive ground-borne vibration or ground-borne noise levels?

Construction

Construction equipment anticipated for undergrounding projects implemented under the Project include a variety of engine-driven vehicles and machines as well as hand-held or portable devices. Table 4.6-5 presents a sampling of typical anticipated construction equipment and distances from a receiving occupied residential structure or a historic structure within which vibration velocity levels would likely exceed the indicated threshold and therefore could result in a **potentially significant impact**, as was determined for historic buildings in Section 4.4.

Table 4.6-5
Estimated Average Receptor-to-Activity Distance within which Anticipated Construction Vibration would Exceed Impact Criteria

Construction Phase for Typical Undergrounding Project Implemented under Project (sample vibration-producing equipment)	Reference Vibration Velocity Level (ips PPV) at 25 feet	Distance (feet) within which Vibration Velocity would exceed 0.2 ips PPV (occupied residence)	Distance (feet) within which Vibration Velocity would exceed 0.1 ips PPV (fragile or historic structure)
Trenching/Boring/Conduit (roller)	0.21	25	50
Trenching/Boring/Conduit (auger drill rig[a])	0.089	12	23
Trenching/Boring/Conduit (compactor[b])	0.035	5	9
Trenching/Boring/Conduit (backhoe or excavator[c])	0.089	12	23
Trenching/Boring/Conduit (skidsteer[d])	0.003	0.55	1
Removal of Overhead Utilities (crane[c])	0.089	12	23
Post-Undergrounding Improvements (crane[c])	0.089	12	23
Post-Undergrounding Improvements (skid-steer[d])	0.003	0.55	1
Street Restoration (backhoe or front-end loader[c])	0.089	12	23
Street Restoration (roller)	0.21	25	50

Source: Table 7-4, Caltrans 2020.
Notes: ips = inches per second; PPV = peak particle velocity.
[a] Assumed comparable to "caisson drilling" per Caltrans (2020) Table 18.
[b] Assumed comparable to "jackhammer" per Caltrans (2020) Table 18.
[c] Assumed comparable to "large bulldozer" per Caltrans (2020) Table 18.
[d] Assumed comparable to "small bulldozer" per Caltrans (2020) Table 18.

Usage of jackhammers that may be needed to break pavement immediately adjoining a residential structure, which would occur within the indicated 5-foot or 9-foot screening distance (depending upon residential or fragile building type) represents an example of when construction equipment vibration is expected to be a significant and unavoidable impact.

Operation

Implementation of the Project would not result in any long-term development or substantial aboveground noise-generating equipment. No substantial operational vibration would occur; thus, impacts from the Project would be **less than significant**.

4.6.7 SIGNIFICANCE OF IMPACTS

Temporary construction noise impacts from project-level activities conducted under the Project would be **potentially significant** without mitigation for receptors located within the screening distances identified in Table 4.6-4; therefore, in such circumstances, **MM-NOI-1** would be applied for qualifying residential receptors and non-residential commercial and industrial receptors that may have noise-sensitive uses such as offices or day-care centers.

Ground-borne vibration levels resulting from some construction equipment would result in excessive ground-borne vibration levels when occurring very close (i.e., distances identified in Table 4.6-5) to residential homes, historic structures, or buildings within which operation of vibration-sensitive instruments and processes occur, such as medical procedures, advanced technology manufacturing (e.g., lithography), and scientific research. Under such conditions, impacts would be **significant and unavoidable**.

As with any type of construction, vibration levels during any phase may, at times, be perceptible. However, the trenching/boring construction phases that have the highest potential of producing vibration (roller, auger drill, compactor, backhoe, or excavator) would be intermittent and would only occur for short periods of time for any individual site. Using administrative controls, such as project-level (district creation) tabletop studies that identify the status of buildings that fall within screening distances detailed in Table 4.6-5 and by the appropriate use of tools that have a lower potential to produce perceptible vibration, the impact of construction vibration can be reduced.

Implementation of the above practices to reduce vibration during these trenching/boring activities would reduce potential construction vibration-related impacts; however, even with the implementation of the above practices, significant construction vibration-related impacts may still occur because the project-specific construction techniques, locations of construction activities, and location of vibration-sensitive land uses are not known at this time. At a program level of review, construction-related vibration impacts would, therefore, remain **significant and unavoidable**.

4.6.8 MITIGATION, MONITORING, AND REPORTING

MM-NOI-1 Activities implemented under the Project shall be required to comply with the construction noise level limit defined by San Diego Municipal Code (SDMC) Section 59.5.0404. If construction noise would exceed this construction noise limit, a permit would be required from the Noise Abatement and Control Administrator (NACA) in accordance with SDMC Section 59.5.0404, which may include the incorporation of site-specific noise reduction measures to meet property line limitations. Such noise reduction measures may include implementation of any one or more of the following options:

A. Turn off idling equipment and vehicle engines when they are not engaged in performing work to advance project progress.

B. Locate and shield stationary noise sources such as generators, compressors, or pumps as far from the nearest noise-sensitive receivers of concern as feasible.

C. Construction equipment and vehicles shall, at all times, be properly outfitted and maintained with manufacturer-approved noise-reduction devices (e.g., exhaust mufflers) to minimize generated noise.

D. When loose materials are handled or transferred, such as rock, aggregate, or construction debris dumped into a container, the receiving metal walls of the container shall include noise-dampening linings to minimize noise generation as materials make contact with their surfaces.

E. Material laydown and construction vehicle staging areas shall be located as far from noise-sensitive land uses (NSLUs) as feasible.

Additionally, advanced notification shall be provided to surrounding land uses within 100 feet of the project alignment. This disclosure shall include, at a minimum, the project construction schedule, including the various types of activities that would be occurring throughout the duration of the construction period. This notification shall give a contact phone number for any questions or complaints.

As needed and when practical, outdoor noise level monitoring would represent an available technique for evaluating the need for or the post-installation effectiveness of one or more implemented noise reduction measures and thus help ensure that aggregate sound emission from undergrounding project construction work performed by the contractor is in compliance with the City of San Diego's construction noise standard of 75 A-weighted decibel (dBA) equivalent sound level (L_{eq}) (12-hour). If measured noise levels attributed to typical project construction activity over a reasonable sampling period is found to be in exceedance of this

standard, alternative methods (such as the use of quieter equipment or fewer pieces of equipment operating at any one time) or supplemental noise reduction means shall be implemented, as necessary.

Effectiveness of **MM-NOI-1** would, overall, depend on the specific equipment involved in the activity and the original condition of that equipment, the specific locations of the noise sources and the receivers, and other variables. Installation of a noise barrier, for example, would vary in effectiveness depending on the degree to which the line-of-sight between the source and receiver is broken, and typically ranges from 5 to 15 dB. Installation of more effective engine exhaust silencers could offer noise reduction improvements of several decibels. In combination, however, these measures would result in substantial decreases in noise generated from construction.

4.6.9 SIGNIFICANCE AFTER MITIGATION

Regarding Issue 1, in most cases noise impacts would generally be **less than significant** and would not require mitigation, as Project construction activities could be located at distances from sensitive receivers that exceed the screening values studied herein (Table 4.6-4) and result in exposure levels that are comparable to or even less than that of the existing outdoor ambient sound in the vicinity of a receiver, such as one located in a densely populated area or near surface transportation routes.

Regarding Issue 2, construction noise impacts for activities implemented under the Project near sensitive receptors at horizontal distances closer than those identified in Table 4.6-4 would be potentially significant without mitigation. With implementation of **MM-NOI-1**, potential construction noise impacts related to Project implementation would be reduced to a less-than-significant level. However, there may be circumstances where distances between sources of construction activity noise and the receiver are very close and would result in exposure levels that still exceed the City's threshold. For example, one of the construction noise prediction worksheets included as part of Appendix F shows that even with implementation of an 8-foot-tall temporary barrier between the direct sound path from source to receptor, there remain minimum distances within which noise exposures would exceed a 75 dBA 12-hour L_{eq} value. For this reason, and under such potential conditions of source-to-receiver proximity and construction equipment activity as studied herein for the Project, construction noise impacts may be **significant and unavoidable**.

Ground-borne vibration resulting from operation of some construction equipment types would result in excessive vibration exposure levels when occurring very close (i.e., distances identified in Table 4.6-5) to residential homes, historic structures, or buildings within which operation of vibration-sensitive instruments and processes occur. Therefore, the impact would remain **significant and unavoidable**.

4.7 PALEONTOLOGICAL RESOURCES

4.7.1 INTRODUCTION

This section describes the existing paleontological resources setting of the City of San Diego (City) Utilities Undergrounding Program (Project), identifies the applicable regulatory framework, evaluates potential impacts associated with paleontological resources that would result from the Project, identifies mitigation measures, if necessary, to reduce the level of impact associated with implementation of the Project, and identifies the level of significance after mitigation. Information in this section is from applicable environmental plans, including the *City of San Diego General Plan*, San Diego Municipal Code (SDMC), and Community Plans.

4.7.2 EXISTING CONDITIONS

Paleontological resources (i.e., fossils) are the remains and/or traces of prehistoric plant and animal life. Fossil remains, such as bones, teeth, shells, and leaves, are found in the geologic deposits within which they were originally buried. For the purposes of this discussion, paleontological resources can be thought of as including not only the actual fossil remains, but also the areas and geologic formations likely to contain those fossils.

The Project area lies within the western portion of the Peninsular Ranges Geomorphic Province, where older, generally plutonic and metamorphic bedrock geological units are overlain by younger, Cenozoic sedimentary deposits. The Peninsular Ranges were formed by uplift of plutonic igneous rock resulting from the subduction of the Pacific Plate underneath the North American Plate during the latter portion of the Mesozoic Era (approximately 125 to 90 million years ago [Ma]) (Abbott 1999; USGS 2007). Paleontological resource sensitivity of the sedimentary units is listed in Table 4.7-1 (County of San Diego 2009).

Table 4.7-1
Paleontological Resource Sensitivity Criteria

Resource Sensitivity/ Potential	Definition
High	High resource potential and high sensitivity are assigned to geologic formations known to contain paleontological localities with rare, well-preserved, critical fossil materials for stratigraphic or paleoenvironmental interpretation, and fossils providing important information about the paleoclimatic, paleobiological, and/or evolutionary history (phylogeny) of animal and plant groups. In general, formations with high resource potential are considered to have the highest potential to produce unique invertebrate fossil assemblages or unique vertebrate fossil remains and are, therefore, highly sensitive.

Table 4.7-1
Paleontological Resource Sensitivity Criteria

Resource Sensitivity/ Potential	Definition
Moderate	Moderate resource potential and moderate sensitivity are assigned to geologic formations known to contain paleontological localities. These geologic formations are judged to have a strong, but often unproven, potential for producing unique fossil remains (Deméré and Walsh 1993).
Low	Low resource potential and low sensitivity are assigned to geologic formations that, based on their relatively young age and/or high-energy depositional history, are judged unlikely to produce unique fossil remains. Low resource potential formations rarely produce fossil remains of scientific significance and are considered to have low sensitivity. However, when fossils are found in these formations, they are often very significant additions to our geologic understanding of the area.
Marginal	Marginal resource potential and marginal sensitivity are assigned to geologic formations that are composed either of volcaniclastic (derived from volcanic sources) or metasedimentary rocks, but that nevertheless have a limited probability for producing fossils from certain formations at localized outcrops. Volcaniclastic rock can contain organisms that were fossilized by being covered by ash, dust, mud, or other debris from volcanoes. Sedimentary rocks that have been metamorphosed by heat and/or pressure caused by volcanoes or plutons are called metasedimentary. If the sedimentary rocks had paleontological resources within them, those resources may have survived the metamorphism and still be identifiable within the metasedimentary rock, but since the probability of this occurring is so limited, these formations are considered marginally sensitive.
No Potential	No resource potential is assigned to geologic formations that are composed entirely of volcanic or plutonic igneous rock, such as basalt or granite and, therefore, do not have any potential for producing fossil remains. These formations have no paleontological resource potential (i.e., they are not sensitive).

Geologic rock units that underlie the area of potential effect (APE) are listed in Table 4.7-2. As shown in Table 4.7-2, geologic rock units that underlie the Project APE include artificial fill; alluvium, slope wash, and undifferentiated alluvium and slope wash deposits; Bay Point Formation; Lindavista Formation; San Diego Formation; Miocene-age igneous rocks; Otay Formation; Sweetwater Formation; Pomerado Conglomerate; Mission Valley Formation; Stadium Conglomerate; Friars Formation; Scripps Formation; Ardath Shale; Torrey Sandstone; Delmar Formation; Mount Soledad Formation; Cabrillo Formation; Point Loma Formation; Cretaceous-age intrusive igneous rocks; and Mesozoic metasedimentary and metavolcanic rocks, undivided. Following the *General Grading*

Guidelines for Paleontological Resources (City of San Diego n.d.), each rock unit underlying the APE was subsequently assigned a paleontological resource sensitivity rating by the San Diego Natural History Museum (SDNHM) during the records search conducted for the Project. The sensitivity definitions and ratings of these rock units are listed in Tables 4.7-1 and 4.7-2, respectively.

Table 4.7-2
Paleontological Sensitivity of Geological Rock Units Underlying the Project APE

Geological Rock Units	Sensitivity Rating
Artificial Fill (Qaf)	No Potential
Holocene Alluvium, Landslide, Slope Wash, and Undifferentiated Alluvium and Slope Wash Deposits (Qal, Qls, Qsw and Qal + Qsw)	Low
Pleistocene Alluvium or Colluvium (Qoa and Qc)	Moderate
Bay Point Formation (Qbp)	High
Lindavista Formation (Qln and Qlb)	Moderate to High[1]
San Diego Formation (Tsd and Tsdss)	High
Miocene-Age Igneous Rocks (Tba)	No Potential
Otay Formation (To, Tof)	High
Sweetwater Formation (Tsw)	High
Pomerado Conglomerate (Tp)	Moderate to High[2]
Mission Valley Formation (Tmv)	High
Stadium Conglomerate (Tst)	High
Friars Formation (Tf)	High
Scripps Formation (Tsc)	High
Ardath Shale (Ta)	High
Torrey Sandstone (Tt)	Moderate
Delmar Formation (Td)	High
Mount Soledad Formation (Tmss and Tmsc)	Moderate
Cabrillo Formation (Kcs, Kccg)	Moderate
Point Loma Formation (Kp)	High
Cretaceous Intrusive Igneous Rocks (Kg, Kgu, and Kt)	No Potential
Mesozoic Metasedimentary and Metavolcanic Rocks, Undivided (Mzu, and Jsp)	Low (Marginal to Moderate[3])

Source: Appendix G (confidential appendix).
Notes: APE = area of potential effect; SDNHM = San Diego Natural History Museum.

1 The Lindavista Formation is considered to have high paleontological sensitivity in Tierrasanta and Mira Mesa and moderate paleontological sensitivity in all other areas of its geographic extent.

2 The Pomerado Conglomerate is considered to have high paleontological sensitivity in Scripps Ranch and Tierrasanta and moderate paleontological sensitivity in all other areas of its geographic extent.

3 The metavolcanic rocks are assigned marginal sensitivity, and the metasedimentary rocks are assigned moderate sensitivity; however, due to lack of localities near the Project area, the SDNHM assigned a low sensitivity rating to the geological unit.

Paleontological Records Search

A search of the paleontological records at the SDNHM was conducted to determine if any documented fossil collection localities occur in the Project area. The SDNHM has 1,246 fossil localities from geological units within a 0.25-mile radius of the Project area. Of these localities, 297 are located within the boundaries of the undergrounding projects (Confidential Appendix G).

Geologic Units Underlying the Project Area

Artificial Fill (Qaf)

The thickness of the artificial fill (map unit Qaf) mapped throughout the Project area is variable. Due to the young (recent), human-made/placed nature of these deposits, artificial fill has no potential to produce scientifically significant paleontological resources because any recovered fossils are not in their original geographic, stratigraphic, and temporal context (City of San Diego 2022; County of San Diego 2009) (Confidential Appendix G).

Artificial fill underlies 44 of the undergrounding projects and presumably underlies most if not all of the other areas that have previously developed within the City. The SDNHM does not have any fossil localities from deposits of artificial fill within a 0.25-mile radius of the Project area. Because artificial fill has been previously disturbed and may have been imported to the Project area, any contained fossil remains have lost their original stratigraphic contextual data and are thus of little scientific value. For these reasons, artificial fill is assigned no paleontological sensitivity.

Alluvium, Slope Wash, and Undifferentiated Alluvium and Slope Wash Deposits (Qal, Qls, Qsw, and Qal + Qsw)

The Holocene (less than approximately 11,000 years old) alluvium (map unit Qal), landslide (map unit Qls), slope wash (map unit Qsw), and undifferentiated alluvium and slope wash deposits (map unit Qal + Qsw) mapped throughout the Project area along drainages and lower elevations are described by Kennedy (1975) as follows:

> Alluvium in the area consists primarily of poorly consolidated stream deposits of silt, sand, and cobble-sized particles derived from bedrock sources that lie within and to the east of the study area. The alluvium is intertongued with Holocene slope wash that generally mantles the lower valley slopes throughout the area. For this reason, alluvium and slope wash have not been differentiated in most areas.

A total number of 237 of the undergrounding projects are underlain by Holocene-age deposits (Confidential Appendix G). Due to the young (recent) nature of these deposits, Holocene-age alluvium and slope wash has low potential to produce scientifically significant paleontological resources (City of San Diego 2022; County of San Diego 2009) (Confidential Appendix G).

Holocene alluvial deposits are generally less than 11,700 years old and are assigned a low paleontological sensitivity based on their young geologic age and the lack of known fossil localities; however, these deposits may overlie sensitive units that could be impacted where the contact is relatively shallow (Confidential Appendix G). Although Holocene and Pleistocene landslide (Qls) deposits may contain fossils, these fossils have been transported and have lost their contextual stratigraphic data and, therefore, are also considered to have a low paleontological sensitivity. However, these deposits may include at depth Pleistocene old alluvial or colluvial deposits (map units Qoa and Qc), which have a moderate paleontological sensitivity (Confidential Appendix G).

Bay Point Formation (Qbp)

The Pleistocene Bay Point Formation (approximately 0.08 to 0.13 Ma) (Valentine 1959; Kennedy 1973; USGS 2007; GEI 2017) (Confidential Appendix G) (map unit Qbp) consists of shallow marine and nonmarine deposits that are generally correlative with terrace deposits (Qt1-3 of Tan and Kennedy 1996; Qop6-7 and Qop2-4 of Kennedy and Tan 2007). Named for deposits near Crown Point (formerly Bay Point), the formation is composed of poorly consolidated, pale brown, fine- to medium-grained sandstones (Valentine 1959; Tan and Kennedy 1996; Kennedy 1975).

The Bay Point Formation has produced important invertebrate and vertebrate fossil localities along coastal San Diego (Stephens 1929; Hertlein and Grant 1939; Valentine 1959; Deméré 1981) and has high paleontological sensitivity (City of San Diego 2022; County of San Diego 2009) (Confidential Appendix G). The nearshore marine deposits of the Pleistocene-age (approximately 11,700 to 750,000 years old) Bay Point Formation underlie 18 undergrounding projects. More specifically, these deposits rest on the Nestor and Bird Rock terraces (approximately 120,000 and 80,000 years old, respectively) and are equivalent to units 6 and 7, old paralic deposits, of Kennedy and Tan (2008). The SDNHM has 33 fossil collection localities from the Bay Point Formation within a 0.25-mile radius of the Project area. These localities yielded trace fossils (e.g., sponge borings in shell and worm tubes) and fossilized impressions or remains of plants (e.g., magnolias and other vascular plants), marine invertebrates (e.g., foraminifers, bryozoans, chitons, snails, clams, mussels, oysters, scallops, ostracods, crabs, barnacles, sea urchins, and sand dollars), marine vertebrates (e.g., sharks, rays, and bony fish), and terrestrial vertebrates (e.g., birds, rodents, horses, and mammoths).

Lindavista Formation (Qln and Qlb)

The Pleistocene Lindavista Formation (approximately 0.7 to 1.5 Ma) (GEI 2017; Kennedy 1973; USGS 2007) (map units Qln and Qlb) represents nearshore marine, beach, and nonmarine depositional environments and is present throughout the Project area, either mapped at the surface or underlying artificial fill or surficial alluvial deposits. The Lindavista Formation is generally correlative with very old paralic deposits ($Qvop_{1-13}$ of Kennedy and Tan [2008]) and is considered to have high paleontological sensitivity in Tierrasanta and Mira Mesa and moderate paleontological sensitivity in

all other areas of its geographic extent. Within the Project area, the Lindavista Formation has moderate chance to produce scientifically significant paleontological resources (City of San Diego 2022; County of San Diego 2009) (Confidential Appendix G).

Marine and/or non-marine terrace deposits of the early to middle Pleistocene-age (approximately 0.5 to 1.5 Ma) Lindavista Formation (mapped by Kennedy and Tan [2008] as Quaternary very old paralic deposits, various units) underlie 14 of the undergrounding projects. The SDNHM does not have any fossil collection localities from these deposits within a 0.25-mile radius of the Project area. The rare fossil localities in San Diego County have produced remains of nearshore marine invertebrates (e.g., snails, clams, scallops, barnacles, and sand dollars).

San Diego Formation (Tsd and Tsdss)

The early Pleistocene to late Pliocene (approximately 1.5 to 3 Ma) San Diego Formation (map units Tsd and Tsdss) consists of marine and nonmarine strata and is named for deposits in the South Bay area of San Diego (Arnold 1906; Deméré 1983; GEI 2017). The San Diego Formation has produced numerous fossil traces, plants, invertebrates, and vertebrates and has high potential to produce scientifically significant paleontological resources (City of San Diego 2022; County of San Diego 2009) (Confidential Appendix G).

Marine sedimentary deposits of the San Diego Formation underlie 15 of the undergrounding projects. The SDNHM has 48 fossil collection localities from the San Diego Formation within a 0.25-mile radius of the undergrounding projects. These localities produced trace fossils (e.g., sponge borings, worm burrows, and coprolites) and fossilized impressions or remains of plants (e.g., coralline algae and vascular plants), marine invertebrates (e.g., bryozoans, brachiopods, snails, mussels, oysters, scallops, clams, tusk shells, shrimp, barnacles, crabs, starfish, sand dollars, and sea urchins), marine vertebrates (e.g., sharks, rays, bony fish, sea birds, eared seals, walruses, whales, and sea cows), and terrestrial vertebrates (e.g., rabbits and horses).

Miocene-Age Igneous Rocks (Tba)

The Miocene-age (approximately 11 Ma) basaltic and andesitic igneous rocks (map unit Tba) do not have the potential to yield fossils and, therefore, have no paleontological resource sensitivity (Confidential Appendix G).

Otay Formation (To and Tof)

The Oligocene-age Otay Formation (approximately 29 Ma) consists of three informal members: a basal fanglomerate member, a middle gritstone member, and an upper sandstone-mudstone member (Artim and Pinckney 1973; Deméré 1988; Walsh and Deméré 1991; Tan and Kennedy

2002). The Otay Formation has been known to yield scientifically significant, terrestrial vertebrate fossil specimens and, therefore, has high potential to produce paleontological resources.

The Otay Formation, and in particular, the middle gritstone member, has produced an important assemblage of Arikareean North American Land Mammal Age paleofauna, including tortoises, lizards, snakes, birds, shrews, rodents, rabbits, dogs, foxes, rhinoceroses, camels, mouse-deer, and oreodonts (Deméré 1988) (Confidential Appendix G).

Sweetwater Formation (Tsw)

The late Eocene (approximately 37 to 42 Ma) Sweetwater Formation (map unit Tsw) is a terrestrial sedimentary unit found along coastal San Diego (Deméré and Walsh 1993; GEI 2017). The river channel deposits of the middle Eocene-age (approximately 37 to 42 Ma) Sweetwater Formation have been tentatively identified underlying four individual undergrounding project sites within the Colina del Sol neighborhood of eastern San Diego. The outcrop occurs in an upfaulted block within the La Nacion Fault and is mapped as the Mission Valley Formation by Kennedy and Tan (2008). The two SDNHM fossil collection localities from the Sweetwater Formation within a 0.25-mile radius of the Project area were recovered from this outcrop, including one from a planned undergrounding project site. The Sweetwater Formation has yielded remains of opossums, insectivores, and rodents and has high potential to produce scientifically significant paleontological resources (City of San Diego 2022; County of San Diego 2009; Deméré and Walsh 1993; Walsh 1996) (Confidential Appendix G).

Pomerado Conglomerate (Tp)

The middle Eocene (approximately 42 Ma) Pomerado Conglomerate (map unit Tp) is a fluvial to nearshore marine sedimentary unit found along coastal San Diego (Deméré and Walsh 1993; GEI 2017; Kennedy and Peterson 1975; Kennedy and Tan 2007; Tan and Kennedy 1996; Walsh 1996). The Pomerado Conglomerate has produced extinct terrestrial mammals and marine mollusks and has high potential to produce scientifically significant paleontological resources within the Scripps Ranch and Tierrasanta areas of San Diego and moderate paleontological sensitivity in all other areas of its geographic extent (Deméré and Walsh 1993; Walsh 1996; City of San Diego 2022; County of San Diego 2009) (Confidential Appendix G).

Mission Valley Formation (Tmv)

The middle Eocene (approximately 42 Ma) Mission Valley Formation (map unit Tmv) is a marine sedimentary unit found along coastal San Diego (GEI 2017; Kennedy and Peterson 1975; Kennedy and Tan 2007; Tan and Kennedy 1996). The Mission Valley Formation has produced numerous terrestrial vertebrates and marine invertebrates and vertebrates and has high potential to produce scientifically significant paleontological resources (Deméré and Walsh 1993; Walsh 1996; City of San Diego 2022; County of San Diego 2009) (Confidential Appendix G).

The SDNHM has two fossil collection localities from the Mission Valley Formation within a 0.25-mile radius of the Project area, which yielded fossilized remains of terrestrial mammals (e.g., marsupials, insectivores, bats, primates, and rodents). Elsewhere in San Diego County, marine deposits of the Mission Valley Formation have produced abundant and well-preserved remains of marine invertebrates (e.g., foraminifers, clams, snails, crustaceans, and sea urchins) and marine vertebrates (e.g., sharks, rays, and bony fish).

Stadium Conglomerate (Tst)

The middle Eocene (approximately 42 to 44 Ma) Stadium Conglomerate (map unit Tst) is a terrestrial sedimentary unit found along coastal San Diego (GEI 2017; Kennedy and Peterson 1975; Kennedy and Tan 2007; Tan and Kennedy 1996). The Stadium Conglomerate has yielded significant fossils throughout its geographic extent in San Diego County and has moderate to high potential to produce scientifically significant paleontological resources in the upper member and high potential to yield scientifically significant paleontological resources in the lower member (County of San Diego 2009) (Confidential Appendix G). The City assigns the Stadium Conglomerate high paleontological sensitivity (City of San Diego 2022).

Non-marine deposits of the Stadium Conglomerate underlie 14 of the undergrounding projects. The SDNHM does not have any fossil collection localities from the Stadium Conglomerate within a 0.25-mile radius of the Project area. The upper member of the Stadium Conglomerate has produced fossilized impressions or remains of plants (e.g., petrified wood) and marine invertebrates (e.g., foraminifers and mollusks) and sparse fossilized remains of terrestrial mammals (e.g., opossums, insectivores, primates, rodents, carnivores, rhinoceroses, and artiodactyls). While the upper and lower members of the Stadium Conglomerate have been assigned distinct paleontological resource sensitivities (high to moderate, and high, respectively), these deposits should be treated as having a high fossil potential when it is not possible to distinguish the two members (Confidential Appendix G).

Friars Formation (Tf)

The middle Eocene (approximately 44 to 47 Ma) Friars Formation (map unit Tf) is a terrestrial sedimentary unit found along coastal San Diego. The formation is named for strata located along the north side of Mission Valley, near Friars Road. The Friars Formation has high potential to produce scientifically significant paleontological resources (City of San Diego 2022; County of San Diego 2009) (Confidential Appendix G).

The fluvial deposits of the Friars Formation underlie four individual undergrounding project sites (Confidential Appendix G). The SDNHM has 18 fossil collection localities from the Friars Formation within a 0.25-mile radius of the Project area. The Friars Formation is assigned a high paleontological

sensitivity on the basis of the recovery of diverse and well-preserved assemblages of both marine invertebrates and terrestrial vertebrates from these deposits (Confidential Appendix G).

Scripps Formation (Tsc)

The middle Eocene (approximately 44 to 47 Ma) Scripps Formation (map unit Tsc) is a marine sedimentary unit found along coastal San Diego. Part of the La Jolla Group, it is named for strata located north of the Scripps Institute of Oceanography pier on the north of Black's Canyon (GEI 2017; Geolex 2017; Kennedy and Moore 1971). The Scripps Formation has produced trace, plant, marine invertebrate, and marine vertebrate fossil remains and has high potential to produce scientifically significant paleontological resources (City of San Diego 2022; County of San Diego 2009) (Confidential Appendix G).

Ardath Shale (Ta)

The marine outer shelf deposits of the early middle Eocene-age (approximately 47 to 48 Ma) Ardath Shale (map unit Ta) underlie a single undergrounding project site (Confidential Appendix G). The SDNHM has 11 fossil collection localities from the Ardath Shale within a 0.25-mile radius of the Project area. These localities produced trace fossils (e.g., borings) and fossilized impressions or remains of plants (e.g., flowering plants), marine invertebrates (e.g., foraminifers, corals, bryozoans, worms, brachiopods, snails, clams, mussels, oysters, scallops, tusk shells, crabs, sea stars, and sea urchins), and marine vertebrates (e.g., bony fish). The Ardath Shale has been assigned a high paleontological sensitivity, as indicated by the diverse and well-preserved fossil assemblages that have been recovered from this geologic unit (Confidential Appendix G).

Torrey Sandstone (Tt)

The middle Eocene (approximately 48 to 49 Ma) Torrey Sandstone (map unit Tt) is a marine sedimentary unit found along the coast of San Diego. The Torrey Sandstone is a nearshore marine deposit that consists of white to tan, well-sorted sand. This formation has been known to yield scientifically significant terrestrial plant and marine invertebrate remains, while vertebrate remains are rarer and include crocodile, shark, and ray teeth. The SDNHM has six fossil collection localities from the Torrey Sandstone within a 0.25-mile radius of the Project area; however, none of these are within planned undergrounding project sites (Confidential Appendix G). The Torrey Sandstone has a moderate paleontological sensitivity.

Delmar Formation (Td)

The early middle Eocene (approximately 49 to 50 Ma) Delmar Formation (map unit Td) is a marine sedimentary unit found along the coast of San Diego. The Delmar Formation consists of lagoonal to estuarine deposits and is known to yield fossils. Both aquatic reptiles (such as crocodiles) and

terrestrial mammals (including tillodonts and early rhinoceroses) have been discovered, the latter having been washed in and preserved in shallow, nearshore deposits. The SDNHM has 41 fossil collection localities from the Delmar Formation within a 0.25-mile radius of the Project area; however, none of these are within planned undergrounding project sites (Confidential Appendix G). The Delmar Formation has a high paleontological sensitivity.

Mount Soledad Formation (Tmss and Tmsc)

The early to middle Eocene (approximately 48 to 50 Ma) Mount Soledad Formation (map units Tmss and Tmsc) is a marine sedimentary unit found along the coast of San Diego. The Mount Soledad Formation consists of submarine fan deposits (GEI 2017; Kennedy and Peterson 1975). Taxa recovered from this formation include mollusks, planktonic and benthic foraminifers, and pollen. The SDNHM has 10 fossil collection localities from the Mount Soledad Formation within a 0.25-mile radius of the Project area, including 8 localities that are within planned undergrounding project sites (Confidential Appendix G). The Mount Soledad Formation has a moderate paleontological sensitivity.

Cabrillo Formation (Kcs and Kccg)

The Late Cretaceous (approximately 72 to 76 Ma) Cabrillo Formation (map units Kcs and Kccg) is a marine sedimentary unit found along the coast of San Diego (GEI 2017). The Cabrillo Formation consists of submarine fan deposits (GEI 2017; Abbott 1999; Kennedy and Peterson 1975). Fossils recovered from this formation include marine invertebrates and vertebrate remains. The SDNHM has six fossil collection localities from the Cabrillo Formation within a 0.25-mile radius of the Project area; however, none of these are within planned undergrounding project sites (Confidential Appendix G). The Cabrillo Formation has a moderate paleontological sensitivity.

Point Loma Formation (Kp)

The Late Cretaceous (approximately 75 Ma) Point Loma Formation (map unit Kp) is a marine sedimentary unit found along the coast of San Diego (GEI 2017). The Point Loma Formation consists of marine shelf and submarine fan deposits (GEI 2017; Abbott 1999; Kennedy and Peterson 1975; Tan and Kennedy 1996). Fossils recovered from this formation include diverse fossil assemblages of marine invertebrates, marine vertebrates (e.g., sharks, bony fish, and mosasaurs), and rare terrestrial plants, duck-billed dinosaurs (hadrosaurs), and armored dinosaurs (ankylosaurs). The SDNHM has 33 fossil collection localities from the Point Loma Formation within a 0.25-mile radius of the Project area, including 2 localities that are within planned undergrounding project sites (Confidential Appendix G). The Point Loma Formation has a high paleontological sensitivity.

Cretaceous-Age Intrusive Igneous Rocks (Kg, Kgu, and Kt)

Cretaceous-age (more than approximately 66 Ma) igneous bedrock (map units Kg, Kgu, and Kt) in this area is mid-Cretaceous in age and described by Kennedy (1975) as granitic rocks of the Southern California Batholith (USGS 2007). Of the individual undergrounding project sites, 18 are underlain by these rocks (Confidential Appendix G). The SDNHM does not have any fossil localities from intrusive igneous rocks within a 0.25-mile radius of the Project area. Plutonic igneous rocks do not preserve fossils because they crystallize at extremely high temperatures and pressures several miles below the earth's surface, so these rocks are assigned no paleontological sensitivity. Igneous rocks have no paleontological resource potential (County of San Diego 2009) (Confidential Appendix G).

Mesozoic Metasedimentary and Metavolcanic Rocks, Undivided (Mzu and Jsp)

The Mesozoic metasedimentary and metavolcanic bedrock (map units Mzu and Jsp) are late Jurassic to early Cetaceous (approximately 125–145 Ma) in age and are the oldest geological unit within the Project area. These rocks underlie 15 of the undergrounding project sites. Metasedimentary deposits mapped as the Santiago Peak volcanics (map unit Jsp) within San Diego County have a marginal sensitivity, due to the minor fossil potential within these specific rock types (County of San Diego 2009) (Confidential Appendix G). Overall, this geological unit has a low paleontological sensitivity.

The SDNHM does not have any fossil localities from this undivided unit within a 0.25-mile radius of the Project area. The metavolcanic portions of this unit rarely preserve fossils due to the high temperatures associated with their formation; some of the volcanic breccias, however, have produced petrified wood and are assigned a marginal sensitivity (Deméré and Walsh 1993). The metasedimentary portions have the potential to yield fossils, including siliceous microfossils (e.g., radiolarians) and marine macroinvertebrates (e.g., clams and belemnites), and are assigned a moderate paleontological sensitivity. The lack of nearby localities from these deposits indicates that fossil recovery is unlikely, so the geologic unit as a whole is assigned a low paleontological sensitivity.

4.7.3 REGULATORY SETTING

Federal

Paleontological Resources Preservation Act

The Paleontological Resources Preservation Act requires the Secretaries of the Interior and Agriculture to manage and protect paleontological resources on federal land using scientific principles and expertise. The Omnibus Public Lands Act–Paleontological Resources Preservation (OPLA–PRP) includes specific provisions addressing management of these resources by the Bureau of Land Management, the National Park Service, the Bureau of Reclamation, the U.S. Fish

and Wildlife Service, all of the Department of the Interior, and the Forest Service of the U.S. Department of Agriculture.

OPLA–PRP affirms the authority for many of the policies that the federal land-managing agencies already have in place for the management of paleontological resources, such as issuing permits for collecting paleontological resources, curation of paleontological resources, and confidentiality of locality data. The OPLA–PRP only applies to federal lands and does not affect private lands. It provides authority for the protection of paleontological resources on federal lands, including criminal and civil penalties for fossil theft and vandalism. As directed by the act, the federal agencies are in the process of developing regulations, establishing public awareness and education programs, and inventorying and monitoring federal lands.

State

The California Environmental Quality Act (CEQA) Guidelines (14 CCR 15000 et seq.) require that all private and public activities not specifically exempted be evaluated against the potential for environmental damage, including effects to paleontological resources. Paleontological resources are recognized as part of the environment under these guidelines.

Local

City of San Diego Municipal Code

Chapter 14, Article 2, Division 1 of the SDMC was updated in March 2018 to include the following for paleontological resources:

Section 142.0151: Paleontological Resources Requirements for Grading Activities

a) Paleontological resources monitoring shall be required in accordance with the General Grading Guidelines for Paleontological Resources in the Land Development Manual for any of the following:
    (1) Grading that involves 1,000 cubic yards or greater, and 10 feet or greater in depth, in a High Resource Potential Geologic Deposit/Formation/Rock Unit; or
    (2) Grading that involves 2,000 cubic yards or greater, and 10 feet or greater in depth, in Moderate Resource Potential Geologic Deposit/Formation/Rock Unit; or
    (3) Grading on a fossil recovery site or within 100 feet of the mapped location of a fossil recovery site.
b) If paleontological resources, as defined in the General Grading Guidelines for Paleontological Resources, are discovered during grading, notwithstanding Section 142.0151(a), all grading in the area of discovery shall cease until a

qualified paleontological monitor has observed the discovery, and the discovery has been recovered in accordance with the General Grading Guidelines for Paleontological Resources.

Land Development Manual

Appendix P of the City of San Diego Land Development Manual details the City's general grading guidelines for paleontological resources. The general guidelines require paleontological resource monitoring in the event any of the following occurs pursuant to SDMC Section 142.0151:

1. Grading that involves 1,000 cubic yards or greater, and 10 feet or greater in depth, in a High Resource Potential Geologic Deposit/Formation/Rock Unit; or
2. Grading that involves 2,000 cubic yards or greater, and 10 feet or greater in depth, in Moderate Resource Potential Geologic Deposit/Formation/Rock Unit; or
3. Grading on a fossil recovery site or within 100 feet of the mapped location of a fossil recovery site.

(b) If paleontological resources, as defined in the General Grading Guidelines for Paleontological Resources, are discovered during grading, notwithstanding Section 142.0151(a), all grading in the area of discovery shall cease until a qualified paleontological monitor has observed the discovery, and the discovery has been recovered in accordance with the General Grading Guidelines for Paleontological Resources.

4.7.4 THRESHOLDS OF SIGNIFICANCE

Thresholds used to evaluate potential impacts related to paleontological resources are based on applicable criteria in the City's *CEQA Significance Determination Thresholds* (City of San Diego 2022) and CEQA Guidelines Appendix G. Thresholds are modified from the City's *CEQA Significance Determination Thresholds* and CEQA Guidelines Appendix G and provide guidance to determine potential significance for paleontological resource impacts. The Project would have a significant impact to paleontological resource if it would:

Issue 1: Require over 1,000 cubic yards of excavation in a high resource potential geologic deposit/formation/rock unit

Issue 2: Require over 2,000 cubic yards of excavation in a moderate resource potential geologic deposit/formation/rock unit

4.7.5 APPROACH AND METHODOLOGY

The paleontological resources information in this section is based on review of published geological maps covering the Project area and a paleontological records search conducted by the SDNHM, which is included as Confidential Appendix G. Potential impacts were assessed by identifying the nature and likelihood of paleontological resources occurrences within the Project area and identifying locations where proposed activities could directly or indirectly (by vibration, for instance) affect potential paleontological resources.

4.7.6 IMPACTS

Issue 1: Would the Project require over 1,000 cubic yards of excavation in a high resource potential geologic deposit/formation/rock unit; or,

Issue 2: Would the Project require over 2,000 cubic yards of excavation in a moderate resource potential geologic deposit/formation/rock unit?

Impact Threshold

Under the City's *CEQA Significance Determination Thresholds* for paleontology (City of San Diego 2022), specific policies have been created to reduce impacts to paleontological resources. The City's thresholds include a Paleontological Monitoring Determination Matrix that identifies which formational units are considered to have a high, moderate, low, or zero sensitivity rating. The determination matrix also addresses certain conditions where monitoring is required when the thresholds are not met and notes: "Monitoring is always required when grading on a fossil recovery site or near a fossil recovery site in the same geologic deposit/formation/rock unit as the project site as indicated on the Kennedy Maps. Monitoring may be required for shallow grading (i.e., <10 feet) when a site has previously been graded and/or unweathered geologic deposits/formations/rock units are present at the surface. Monitoring is not required when grading documented or undocumented artificial fill" (City of San Diego 2022).

Analysis

As described in Chapter 3, Project Description, the Project includes a description of planned activities, as well as supporting implementation methods. The majority of these activities are routine in nature and anticipated to occur in conformance with the Project. However, additional activities not identified in the Project may be required and may occur anywhere within the City's Project area.

Geological mapping indicates that the individual undergrounding project sites are underlain by artificial fill; alluvium, slope wash, and undifferentiated alluvium and slope wash deposits; Bay Point

Formation; San Diego Formation; Miocene-age igneous rocks; Otay Formation; Sweetwater Formation; Pomerado Conglomerate; Mission Valley Formation; Stadium Conglomerate; Friars Formation; Scripps Formation; Ardath Shale; Torrey Sandstone; Delmar Formation; Mount Soledad Formation; Cabrillo Formation; Point Loma Formation; Cretaceous-age intrusive igneous rocks; and Mesozoic metasedimentary and metavolcanic rocks, undivided. Many of these geologic units have produced numerous plant and animal fossils in the region; therefore, these units should be considered to have high potential to contain significant paleontological resources. Based on the records search results, the sedimentary rock within the Project area has low to high potential to produce paleontological resources during construction.

A paleontological records search performed by the SDNHM identified 297 known fossil localities in the Project area. However, given the depth of anticipated excavation for the Project (less than approximately 5 feet in depth), these fossil localities are not anticipated to be impacted by Project-related earthmoving.

Refer to Confidential Appendix G, which identify the individual undergrounding project sites and their respective low to high paleontological sensitivity rating. Determining the paleontological sensitivity of individual undergrounding project sites outlined in Confidential Appendix G is based on underlying geology (both surficial and subsurficial); proximity of known paleontological localities as determined through the paleontological records search results (Confidential Appendix G); the potential for original, as-built excavations within the area to impact geological units with moderate to high paleontological sensitivity; and proposed earthwork.

Pursuant to Land Development Code (LDC) Section 142.0151, the City Transportation Department shall verify grading quantities and geologic formation sensitivity for all ground-disturbing construction activities and apply the appropriate requirements for paleontological monitoring. Geologic formation sensitivity is provided in Table 4.7-2, Paleontological Sensitivity of Geological Rock Units Underlying the Project APE. Regulatory compliance for ground-disturbing construction activities would be ensured through notes on plans in accordance with the *General Grading Guidelines for Paleontological Resources* in the City's Land Development Manual. In the event that excavation quantities exceed the City's established thresholds in these sensitive locations, compliance with LDC Section 142.0151 and Land Development Manual Appendix P would ensure that the potential for impacts to paleontological resources would be **less than significant** through paleontological monitoring as required.

4.7.7 SIGNIFICANCE OF IMPACTS

Individual undergrounding project sites, as well as additional potential Project activities, would be underlain by geologic formations with moderate to high paleontological sensitivity (Confidential Appendix G). Pursuant to LDC Section 142.0151, Land Development Manual

Appendix P, if there are impacts due to construction activities where excavation would exceed the City's thresholds in sensitive areas or around known fossil recovery sites, monitoring would be required. With implementation of required monitoring, the potential for impacts to paleontological resources would be **less-than-significant**, and no mitigation measures would be required.

4.7.8 MITIGATION, MONITORING, AND REPORTING

No mitigation measures would be required because potential impacts to paleontological resources associated with implementation of the proposed Project would be **less than significant**.

4.7.9 SIGNIFICANCE AFTER MITIGATION

The potential for impacts to paleontological resources during construction of the Project would be **less than significant** through compliance with the LDC and no mitigation is required.

4.8 TRANSPORTATION

4.8.1 INTRODUCTION

This section describes the existing transportation setting of the City of San Diego (City) Utilities Undergrounding Program (Project), identifies the applicable regulatory framework, evaluates potential impacts associated with transportation that would result from the Project, identifies mitigation measures, if necessary, to reduce the level of impact associated with implementation of the Project, and identifies the level of significance after mitigation. Information in this section is from applicable environmental plans, including the *City of San Diego General Plan*, San Diego Municipal Code (SDMC), and Community Plans.

4.8.2 EXISTING CONDITIONS

All construction activities associated with implementation of the Project would generally be located within the City's geographic boundaries and jurisdiction. The gray areas in Figure 2-1 represent the districts that will be qualitatively analyzed in the section below.

Undergrounding projects adjacent to state freeways and highways would not directly impact vehicular travel but may occur on state right-of-way (ROW) pending receipt of appropriate encroachment permits from the California Department of Transportation. Descriptions of the types of City roadways are provided below.

Roadway Network

The roadway network within the City includes a number of freeways, expressways, and arterial, major, and collector streets that provide a reasonable level of mobility and accessibility. General descriptions for each roadway category are provided below:

- **Freeway**. Freeways are under the jurisdiction of the California Department of Transportation, have full access control with full grade separation and ramp connections, and are usually divided roadways with four lanes or more. Their primary purpose is the longer distance movement of traffic.
- **Expressway**. An expressway is a divided highway whose only purpose is to carry through traffic and to provide a network connecting to the State Highway System. An expressway has full control of access and may have grade separations at selected intersections. Expressways are located so as to serve travel demand corridors that exceed the vehicle-carrying capacity of an arterial street.
- **Primary Arterial**. A primary arterial is a six-lane divided highway with some access control and possibly grade separations. Its main function is to carry through traffic and to provide a network connecting to the State Highway System.

- **Major Street**. A major street is a four- or six-lane divided highway designed to interconnect major activity areas in the city and to provide a network connecting to the State Highway System. It provides direct access to abutting property as its secondary function.
- **Collector Street**. A collector street is a two- or four-lane street that serves to move traffic in local areas and carry it to major streets. Collector streets are also designed to provide direct access to abutting properties.
- **Sub-Collector Street**. A sub-collector street or local street is designed primarily to provide access to adjoining property with the movement of traffic given secondary importance. Most residential streets within the community are designated as sub-collector streets.

California Department of Transportation facilities include Interstates 5, 15, and 805; State Routes 52, 54, 56, 94, and 125; and Routes 905 and 11 along the United States–Mexico border. Some of the major expressways, arterials, and major streets in the City are Via De La Valle, Del Mar Heights Road, Carmel Valley Road, Camino Del Norte, Sorrento Valley Boulevard, Mira Mesa Boulevard, Miramar Road, Claremont Mesa Boulevard, Balboa Avenue, Friars Road, University Avenue, Otay Mesa Road, Beyer Boulevard, Camino De La Plaza, and Genesee Avenue.

Transit System

Rail and bus service are the primary forms of public transportation in the City. The Coaster and Amtrak trains provide passenger rail service to the City along the coastal rail corridor. The Coaster provides commuter rail service between Oceanside and downtown San Diego with stations in the City at Sorrento Valley, Old Town, and the Santa Fe Depot. Amtrak provides intercity passenger rail service from downtown San Diego to Los Angeles, and north to San Luis Obispo. Public transit service is also provided by the San Diego Metropolitan Transit System and consists of light-rail transit (or Trolley) and public bus. The San Diego Metropolitan Transit System operates fixed-bus service that includes local, urban, express, and rural routes. The San Diego Trolley operates on three lines: the Blue, Orange, and Green Lines.

Bicycle and Pedestrian Facilities

The City's *Bicycle Master Plan* (City of San Diego 2013) provides a framework for making cycling a more practical and convenient transportation option that also reflects changes in user needs and changes to the City's bicycle network and overall infrastructure.

The City currently has a developed bicycle network that consists of bike paths, bike lanes, and bike routes. Many bike paths are located in Mission Valley, Mission Bay Park, and along the beachfronts in Pacific Beach and Mission Beach. Other bike paths of significant length can be found in Carmel Valley, Rancho Peñasquitos, Mira Mesa, Rose Canyon, near the San Diego International Airport, and in the Mission Trails Park. Most of the bike lane facilities are located in areas of the City

developed within the last 30 years and include Rancho Bernardo, Rancho Peñasquitos, Sabre Springs, Mira Mesa, University City, Carmel Valley, and Tierrasanta. Bike routes are located along major arterials as well as along quiet neighborhood streets.

The City classifies all walking facilities into one of seven types: district sidewalks, corridor sidewalks, connector sidewalks, neighborhood sidewalks, ancillary pedestrian facilities (such as plazas, paseos, promenades, courtyards, or pedestrian bridges and stairways), path, and trails. The City's *Final Draft Pedestrian Master Plan* (City of San Diego 2015) provides guidelines for pedestrian improvement projects with the intent to enhance pedestrian safety, walkability, mobility, and neighborhood quality.

4.8.3 REGULATORY SETTING

Senate Bill 743

On September 27, 2013, Governor Jerry Brown signed Senate Bill (SB) 743, which went into effect in January 2014. SB 743 directed the Governor's Office of Planning and Research (OPR) (now the Governor's Office of Land Use and Climate Innovation) to develop revisions to the California Environmental Quality Act (CEQA) Guidelines (14 CCR 15000 et seq.) by July 1, 2014, to establish new criteria for determining the significance of transportation impacts and define alternative metrics for traffic level of service (LOS). This started a process that changes transportation impact analysis under CEQA. These changes include elimination of auto delay, LOS, and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts for land use projects and plans in California. Additionally, parking impacts for particular types of development projects in areas well served by transit are not considered significant impacts on the environment. According to the legislative intent contained in SB 743, these changes to current practice were necessary to "more appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions."

On January 20, 2016, OPR released the *Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA*, which was an update to *Updating Transportation Impacts Analysis in the CEQA Guidelines, Preliminary Discussion Draft of Updates to the CEQA Guidelines Implementing Senate Bill 743*, which had been released August 6, 2014. Of particular relevance was the updated text of the proposed new CEQA Guidelines Section 15064.3, which relates to the determination of the significance of transportation impacts, alternatives, and mitigation measures. Specifically, CEQA Guidelines Section 15064.3 establishes vehicle miles traveled (VMT) as the most appropriate measure of transportation impacts. In November 2018, the California Natural Resources Agency finalized the updates to the CEQA Guidelines, and the updated guidelines became effective on December 28, 2018.

OPR's regulatory text indicated that a public agency may immediately commence implementation of the new transportation impact guidelines and that the guidelines must be implemented statewide by July 1, 2020. However, the OPR (2018) *Technical Advisory on Evaluating Transportation Impacts in CEQA* allowed local agencies to retain their congestion-based LOS standards in General Plans and for project planning purposes. The legislative intent of SB 743 has many consistencies with City of San Diego goals and policies contained in the *City of San Diego General Plan*, *Climate Action Plan*, and individual community plans.

Based on these changes, the City adopted the *CEQA Significance Determination Thresholds* for transportation, which sets forth the revised thresholds of significance for evaluating transportation impacts. In conjunction with this update, the City also adopted its *Transportation Study Manual (TSM)* (City of San Diego 2022a), which defines the methodology for analyzing a project's transportation impacts in accordance with SB 743 (i.e., screening and evaluation criteria for determining VMT impacts). The TSM also includes the requirements for non-CEQA analysis, such as the Local Mobility Analysis, which evaluates the effects of a development project on mobility, access, circulation, and related safety elements in the proximate area of the project.

All undergrounding projects must complete a Local Mobility Analysis unless they meet the following screening criteria (City of San Diego 2022a):

- Consistent with community plan and zoning designation and generates less than 1,000 daily unadjusted driveway vehicle trips
- Inconsistent with community plan or zoning designation and generates less than 500 daily unadjusted driveway vehicle trips
- Within the Downtown Community Planning Area and generates less than 2,400 daily unadjusted trips.

City of San Diego General Plan Mobility Element

The purpose of the Mobility Element (City of San Diego 2024) is to improve mobility through development of a balanced, multimodal transportation network. The Mobility Element and Land Use and Community Planning Element of the General Plan are closely linked. The Land Use and Community Planning Element identifies existing uses and planned land uses, and the Mobility Element identifies the proposed transportation network and strategies that have been designed to meet the future transportation needs generated by the planned land uses. The Mobility Element is part of a larger body of plans and programs that guide the development and management of our transportation system. The *Regional Transportation Plan*, prepared and adopted by the San Diego Association of Governments (SANDAG), is the region's long-range mobility plan. The *Regional Transportation Plan* plans for and identifies projects for multiple modes of transportation in order to achieve a balanced regional system. The Mobility Element and the *Regional Transportation Plan* both

highlight the importance of integrating transportation and land use planning decisions and using multimodal strategies to reduce congestion, increase travel choices, and decrease VMT. However, the Mobility Element more specifically plans for the City's transportation goals and needs. It expresses a citywide vision and provides a comprehensive policy framework for how the City should grow and develop, provide public services, and maintain the qualities that define the City. Land use decisions influence transportation and greatly affect how much a person travels, how they travel, and how far they travel, which are all components of VMT.

The General Plan Mobility Element, *Bicycle Master Plan* (City of San Diego 2013), *Pedestrian Master Plan* (City of San Diego 2015), and community plans all provide a vision and guidance for planning and enhancing neighborhood quality and mobility options with bicycle and pedestrian improvements.

Community Plans

The community plans are a part of the Land Use Element of the General Plan. Community plans provide more detailed land use designations and site-specific policy recommendations than is practical at the citywide level. Community plans typically address community issues, such as the local street, bicycle, pedestrian, and transit networks; distinctive environmental characteristics; community landmarks; location, prioritization, and provision of public facilities; community urban design guidelines; and identification of gateways. Together, the General Plan and the community plans seek to guide future growth and development to achieve citywide and community-level goals. There are 52 communities in the City. A detailed description of each community plan is included in the Section 4.5, Land Use.

Climate Action Plan

The City's updated 2022 *Climate Action Plan* (CAP) replaced the plan adopted in 2015. The plan includes strategies that are composed of associated targets, measures, actions (quantified), and supporting actions (qualitative; not yet quantifiable) that the City can use to avoid or mitigate and reduce future greenhouse gas emissions. The CAP helps achieve the greenhouse gas reduction targets set forth by the State of California. The City's new CAP establishes a community-wide goal of net zero by 2035, committing San Diego to an accelerated trajectory for greenhouse gas reductions.

The Project's greenhouse gas analysis has been conducted consistent with the applicable CAP requirements; refer to Section 4.3, Greenhouse Gas Emissions.

4.8.4 THRESHOLDS OF SIGNIFICANCE

The City's *CEQA Significance Determination Thresholds* (City of San Diego 2022b) for transportation are based on CEQA Guidelines Appendix G. For the purposes of this analysis, the Project would have a significant environmental impact if it would:

Issue 1: Conflict with an adopted program, plan, ordinance, or policy addressing the transportation system, including transit, roadways, bicycle and pedestrian facilities

Issue 2: Result in vehicle miles traveled (VMT) exceeding thresholds identified in the City of San Diego Transportation Study Manual

Issue 3: Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)

Issue 4: Result in inadequate emergency access

4.8.5 APPROACH AND METHODOLOGY

The current CEQA Guidelines require that transportation impacts be evaluated based on vehicle miles traveled (VMT) rather than LOS or any other measure of a project's effect on automobile delay. This section includes a qualitative analysis of VMT based on the requirements of the current CEQA Guidelines and the City's guidelines for analysis of transportation impacts.

However, the construction phase of each undergrounding project in the Project would have the potential to affect City transportation facilities immediate to each undergrounding project due to temporary traffic generated by construction workers and trucks, and temporary street and/or lane closures. Once the construction is completed at the Project's work areas, conditions at the affected transportation facilities would return to pre-Project conditions. If needed due to construction activities, the City will install curb ramps, replace streetlights, plant new street trees, and repair damaged pavement. The following section will focus on the Project's potential impacts to the City's transportation network.

4.8.6 IMPACTS

Issue 1: Would the Project conflict with an adopted program, plan, ordinance, or policy addressing the transportation system, including transit, roadways, bicycle and pedestrian facilities?

Impact Threshold

According to the City's *Significance Determination Thresholds* (City of San Diego 2022b), transportation impacts may be significant if a project would conflict with adopted policies, plans, or programs supporting alternative transportation modes (e.g., bus turnouts, bicycle racks). A significant transportation impact could occur if the proposed project would conflict with the General Plan Mobility Element or other adopted transportation programs, plans, ordinances, or policies, such as the City's *Bicycle Master Plan*.

Analysis

Construction of each undergrounding project (up to 15 total miles per year) under the Project is expected to take approximately 63 months and would include six construction phases: trenching/boring and conduit installation, cabling and connection, cut-overs, removal of overhead equipment and poles, post-undergrounding improvements, and street restoration. Post-undergrounding improvements would include public improvements like curb ramps, streetlights, tree planting, and paving or pavement restoration. Construction could also temporarily pause due to unforeseen circumstances, which would extend the overall construction period beyond what is listed above. Construction work would be conducted Monday through Friday between 7:30 a.m. to 4:00 p.m. Traffic generated by the construction phase of the project would be temporary, and this traffic would cease once construction of the proposed project is completed.

The City, in coordination with the San Diego Gas & Electric Company, will be required to obtain applicable encroachment permits from affected jurisdictions outside of the City (i.e., the California Department of Transportation) for any work conducted within the ROW of public transportation facilities (i.e., state facilities and railroad crossings) of those affected jurisdictions.

Tables 4.8-1 and 4.8-2 provide the project trip generation estimates for each construction phase. These estimates are based on the maximum number of construction workers, vendor trucks, and haul trucks for each construction phase required for a typical undergrounding project (up to 15 total miles per year).

Table 4.8-1
Construction Project Trip Generation

Vehicle Type	Daily Quantity	Daily Trips1	AM Peak Hour			PM Peak Hour		
			In	*Out*	*Total*	*In*	*Out*	*Total*
Phase I – Trenching/Boring/Conduit								
Workers	20	40	20	0	20	0	20	20
Vendor Trucks[2]	6	12	1	1	2	1	1	2
Haul Trucks[2]	3	6	1	0	1	0	1	1
Subtotal Phase I		*58*	*22*	*1*	*23*	*1*	*22*	*23*
Phase II – Cabling and Connection								
Workers	12	24	12	0	12	0	12	12
Vendor Trucks[2]	4	8	1	0	1	0	1	1
Haul Trucks[2]	0	0	0	0	0	0	0	0
Subtotal Phase II		*32*	*13*	*0*	*13*	*0*	*13*	*13*
Phase III – Cut-Overs								
Workers	8	16	8	0	8	0	8	8
Vendor Trucks[2]	0	0	0	0	0	0	0	0
Haul Trucks[2]	0	0	0	0	0	0	0	0
Subtotal Phase III		*16*	*8*	*0*	*8*	*0*	*8*	*8*

Table 4.8-1
Construction Project Trip Generation

Vehicle Type	Daily Quantity	Daily Trips1	AM Peak Hour			PM Peak Hour		
			In	*Out*	*Total*	*In*	*Out*	*Total*
Phase IV – Removal of Overhead Equipment and Poles								
Workers	5	10	5	0	5	0	5	5
Vendor Trucks[2]	0	0	0	0	0	0	0	0
Haul Trucks[2]	3	6	1	0	1	0	1	1
Subtotal Phase IV		*16*	*6*	*0*	*6*	*0*	*6*	*6*
Phase V – Post Undergrounding Improvements								
Workers	14	28	14	0	14	0	14	14
Vendor Trucks[2]	1	2	0	0	0	0	0	0
Haul Trucks[2]	0	0	0	0	0	0	0	0
Subtotal Phase V		*30*	*14*	*0*	*14*	*0*	*14*	*14*
Phase VI – Street Restoration								
Workers	8	16	8	0	8	0	8	8
Vendor Trucks[2]	2	4	1	0	1	0	1	1
Haul Trucks[2]	2	4	1	0	1	0	1	1
Subtotal Phase VI		*24*	*10*	*0*	*10*	*0*	*10*	*10*
Project Total		**176**	**73**	**1**	**74**	**1**	**73**	**74**

Source: Section 4.1, Air Quality and Odor; Appendix B.

Notes:

1 Daily trips represent the number of trips to and from the project area for one individual undergrounding project (i.e., two trips represent one truck traveling to the work area and leaving the work area).

2 Assumes vendor and haul truck trips are spread evenly throughout an 8-hour workday (construction would generally occur between 7:30 a.m. and 4:00 p.m.).

As shown in Table 4.8-1, the construction and post-construction phase of each undergrounding project is expected to generate a total of approximately 176 daily trips, 74 AM peak-hour trips (73 inbound and 1 outbound), and 74 PM peak-hour trips (1 inbound and 73 outbound). As shown in Table 4.8.2, with application of passenger car equivalent (PCE) factor to account for truck trips, the construction and post-construction phase of each undergrounding project is expected to generate a total of approximately 226 PCE daily trips, 84 PCE AM peak-hour trips (82 inbound and 2 outbound), and 84 PCE PM peak-hour trips (2 inbound and 82 outbound). Per Table 4.8-1, Phase I, trenching, boring and conduit installation, would generate the highest volumes of construction-related traffic, relative to other phases. This phase would generate a total of 40 worker trips, 12 vendor trips, and 6 haul trips per day. All the workers would arrive during the AM peak hour and leave during the PM peak hour; however, the vendor and haul truck trips would be spread over an 8-hour workday. As shown in the table above, this phase would generate a total of 58 daily trips, 23 AM peak hour trips, and 23 PM peak hour trips. All other phases would generate fewer daily and peak hour trips than

this phase; however, most phases of construction would overlap and therefore, generate a maximum of 178 daily vehicle trips or 226 PCE daily trips during the construction period.

Table 4.8-2
Construction Project Trip Generation in PCE

Vehicle Type	Daily Quantity	Daily Trips1	AM Peak Hour			PM Peak Hour		
			In	*Out*	*Total*	*In*	*Out*	*Total*
Phase I – Trenching/Boring/Conduit								
Workers	20	40	20	0	20	0	20	20
Vendor Trucks[2]	6	24	2	2	4	2	2	4
Haul Trucks[2]	3	15	3	0	3	0	3	3
Subtotal Phase I		*79*	*25*	*2*	*27*	*2*	*25*	*27*
Phase II – Cabling and Connection								
Workers	12	24	12	0	12	0	12	12
Vendor Trucks[2]	4	16	2	0	2	0	2	2
Haul Trucks[2]	0	0	0	0	0	0	0	0
Subtotal Phase II		*40*	*14*	*0*	*14*	*0*	*14*	*14*
Phase III – Cut-Overs								
Workers	8	16	8	0	8	0	8	8
Vendor Trucks[2]	0	0	0	0	0	0	0	0
Haul Trucks[2]	0	0	0	0	0	0	0	0
Subtotal Phase III		*16*	*8*	*0*	*8*	*0*	*8*	*8*
Phase IV – Removal of Overhead Equipment and Poles								
Workers	5	10	5	0	5	0	5	5
Vendor Trucks[2]	0	0	0	0	0	0	0	0
Haul Trucks[2]	3	15	3	0	3	0	3	3
Subtotal Phase IV		*25*	*8*	*0*	*8*	*0*	*8*	*8*
Phase V – Post Undergrounding Improvements								
Workers	14	28	14	0	14	0	14	14
Vendor Trucks[2]	1	4	0	0	0	0	0	0
Haul Trucks[2]	0	0	0	0	0	0	0	0
Subtotal Phase V		*32*	*14*	*0*	*14*	*0*	*14*	*14*
Phase VI – Street Restoration								
Workers	8	16	8	0	8	0	8	8
Vendor Trucks[2]	2	8	2	0	2	0	2	2
Haul Trucks[2]	2	10	3	0	3	0	3	3
Subtotal Phase VI		*34*	*13*	*0*	*13*	*0*	*13*	*13*
Project Total		**226**	**82**	**2**	**84**	**2**	**82**	**84**

Source: Section 4.1, Air Quality and Odor; Appendix B.
Notes: PCE = passenger car equivalent.
[1] Daily trips represent the number of trips to and from the project area (i.e., two trips represent one truck traveling to the work area and leaving the work area).

[2] Assumes vendor and haul truck trips are spread evenly throughout an 8-hour workday (construction would generally occur between 7:30 a.m. and 4:00 p.m.).

It should be noted that the trip generation estimates of all the phases include traffic destined to/from the Project area; individual worker crews would work in one area along each specific undergrounding project and move along linearly across the length of a typical undergrounding project. Traffic generated by the construction phase of the Project would be temporary; this traffic would cease once construction of each undergrounding project within the Project is completed, and local traffic conditions would return to pre-Project conditions.

The Project would not alter the existing circulation network or construct any new roadways. The TSM specifies that a Local Mobility Analysis is required of projects consistent with a community plan and zoning that generate more than 1,000 average daily trips or projects inconsistent with a community plan or zoning or generate more than 500 average daily trips. The combination of truck trips and employee trips would result in a total of 176 daily vehicle trips or 226 daily PCE trips (see Table 4.8-2) during construction.

It is expected that worker and truck traffic would work in crews that move linearly along the length of a typical project. Given the maximum construction trip generation of 176 (or 226 PCE) daily trips, the trips generated by Project construction would be significantly fewer than 1,000 daily trips per the City's criteria to prepare a Local Mobility Analysis and require any operational analysis. The temporary trips from the Project would not have the potential to conflict with the City's General Plan or any community plan. However, in some circumstances, there may be partial or complete road closure for a short duration during the construction period that could temporarily impact existing circulation of the street and transportation system.

Therefore, implementation of the Project could temporarily disrupt existing or planned vehicular and alternative transportation facilities (i.e., bus routes or bicycle facilities) along the length of each undergrounding project due to construction activities within the public ROW. A Traffic Control Plan/Permit[1] would be required prior to the start of construction within the public ROW. A traffic control plan/permit requires notification to affected agencies (including transit agencies) prior to the start of work. Roadway lane closures and delays would also occur during construction that could alter circulation movements or warrant detours. However, these alterations would be temporary and would not result in inconsistency with the adopted plan, policy, or program related to transit, roadways, and bicycle and pedestrian facilities. Therefore, impacts would be less than significant.

[1] Traffic control permits are required for all public improvement projects, construction projects. or other work encroaching into the public ROW, including the sidewalks, parking spaces, medians, alleys, and streets. The traffic control plan shall conform to the latest edition of the City's *Standard Drawings*, Appendix A; the *Manual of Uniform Traffic Control Devices* and the California Supplement; and the *Standard Specifications for Public Works Construction*, including Regional Supplement Amendments and City Supplement Amendments.

Issue 2: Would the Project result in vehicle miles traveled (VMT) exceeding thresholds identified in the City of San Diego Transportation Study Manual?

Impact Threshold

According to the TSM (City of San Diego 2022a), a project that meets at least one of the following screening criteria would be presumed to have a less-than-significant VMT impact due to the project characteristics and/or location:

1. Residential or Commercial Project Located in a VMT-Efficient Area: The project is a residential or commercial employment project located in a VMT-efficient area (15% or more below the regional average household VMT/capita or VMT/employee) based on the applicable location-based screening map produced by SANDAG.
2. Industrial Project Located in a VMT-Efficient Area: The project is an industrial employment project located in a VMT-efficient area (in an area with average or below average base year VMT/employee) based on the applicable location-based screening map produced by SANDAG.
3. Small Project: The project is a small project defined as generating less than 300 daily unadjusted driveway trips using the City trip generation rates/procedures.
4. Locally Serving Retail/Recreational Project: The project is a locally serving retail/recreational project defined as having 100,000 square feet gross floor area or less and demonstrates through a market area study that the market capture area for the project is approximately 3 miles (or less) and serves a population of roughly 25,000 people or less. Locally serving retail is consistent with the definitions of Neighborhood Shopping Center in the SDMC LDC Trip Generation Manual. Locally serving recreation is consistent with the land uses listed in Appendix B of the draft TSM, given that it meets the square footage and market capture area above. Adding retail/recreation square footage (even if it is 100,000 square feet gross floor area or less) to an existing regional retail shopping area is not screened out.
5. Locally Serving Public Facility: The project is a locally serving public facility defined as a public facility that serves the surrounding community or a public facility that is a passive use. The following are considered locally serving public facilities: transit centers, public schools, libraries, post offices, park-and-ride lots, police and fire facilities, and government offices. Passive public uses include communication and utility buildings, water sanitation, and waste management.
6. Affordable Housing: The project has access to transit and is wholly or has a portion that meets one of the following criteria: is affordable to persons with a household income equal to or less than 50% of the area median income (as defined by California Health and Safety Code Section 50093) or is housing for senior citizens, transitional foster youth, disabled veterans, or homeless persons. The units shall remain deed restricted for a period of at least 55 years. The project shall

provide no more than the minimum amount of parking per unit, per SDMC Section 143.0744. Only the portion of the project that meets the above criteria is screened out.

7. Mixed-Use Project Screening Considerations: The project's individual land uses should be compared to the screening criteria above. It is possible for some of the mixed-use project's land uses to be screened out and some to require further analysis. For purposes of applying the small project screening criteria, the applicant would only include the trip generation for portions of the project that are not screened out based on other screening criteria.
8. Redevelopment Project Screening Considerations: The project is a redevelopment project that demonstrates that the project's total VMT is less than the existing land use's total VMT. Exception: if a project replaces affordable housing with a smaller number of moderate-income or high-income residential units, the project is not screened out and must analyze VMT impacts.

If a project is not screened out based on the above, additional criteria is used to determine the methodology for completing a VMT analysis. Per the TSM, transportation VMT analysis for CEQA shall be conducted using the SANDAG Regional Travel Demand Model, which provides base year VMT data. By utilizing the SANDAG screening maps, the resident VMT per capita and employee VMT per employee can be estimated. Definitions of these metrics are described below per the TSM:

Resident VMT per capita includes all vehicle-based resident trips grouped and summed to the home location of individuals on the trip. It includes all trips: home-based and non-homebased trips. The VMT for each home is then summed for all homes in a particular census tract and divided by the population of that census tract to arrive at resident VMT per capita.

Employee VMT per employee includes all vehicle-based employee trips grouped and summed to the work location of individuals on the trip. This includes all trips, not just work-related trips. The VMT for each work location is then summed for all work locations in a particular census tract and divided by the number of employees of that census tract to arrive at employee VMT per employee.

Analysis

CEQA Guidelines Section 15064.3(b) focuses on the currently adopted VMT metric for determining the significance of transportation impacts. The passage of SB 743 required the focus of transportation analysis change from LOS or vehicle delay to VMT. The TSM (City of San Diego 2022a) establishes the guidelines and methodology for assessing transportation impacts for land use and transportation projects based on the updated CEQA Guidelines. The Project is in San Diego. Therefore, the following assessment is based on the City's TSM and the OPR (2018) *Technical Advisory on Evaluating Transportation Impacts in CEQA*.

VMT is defined as "the amount and distance of automobile travel attributable to a project….'[A]utomobile' refers to on-road passenger vehicles, specifically cars and light trucks" (OPR

2018). OPR has clarified in its technical advisory (OPR 2018) that heavy-duty truck VMT is not required to be included in the estimation of a project's VMT. Other relevant considerations may include the effects of a project on transit and non-motorized travel.

The anticipated construction traffic generated by the Project would be categorized under CEQA Section 15064.3(b)(3), Qualitative Analysis. For permanent operation, the City recommends that any project generating 300 or less average daily trips may be presumed to have a less-than-significant impact and therefore not be subject to screening from a detailed VMT analysis.

The City's TSM guidelines recommend a threshold of significance for land use development (residential, office, industrial, small projects, and other land uses) and transportation projects (City of San Diego 2022a). It should be noted that there is no significance threshold for construction projects or the construction phase of any project. The construction of the Project would generate a relatively low number of temporary construction-related trips (see Tables 4.8-1 and 4.8-2), which reflects trips during all phases of construction and includes heavy-duty truck trips, although such trips have been excluded from VMT analysis by OPR. The increase in VMT associated with projects' construction would be temporary and would not cause a significant VMT impact in accordance with the City's TSM guidelines.

Project operation is anticipated to entail the same or fewer operational vehicle trips as the existing facilities. There would not be permanent staff but may be staff that conducts routine inspections, maintenance, and repairs as required. This would result in relatively minimal new daily personnel and truck trips related to operation of the Project. Therefore, the operation of the Project can be screened out per the City's TSM, given that it would not generate 300 daily trips[2] or more, and would therefore be presumed to have a less-than-significant VMT impact.

Therefore, the construction and operation of the Project would not result in VMT exceeding thresholds, and impacts can be presumed to be **less than significant**.

Issue 3: Would the Project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

[2] Per City of San Diego (2022a, pp. 19–20). The Project is a small project defined as generating less than 300 daily unadjusted driveway trips using the City trip generation rates/procedures. A project that meets this screening criteria would be presumed to have a less-than-significant VMT impact.

Impact Threshold

According to the City's *Significance Determination Thresholds*, transportation impacts may be significant if a project would increase traffic hazards to motor vehicles, bicyclists, or pedestrians due to proposed non-standard design features.

Analysis

Implementation of the Project would not involve construction of roads or permanent design features that would present hazardous roadway and traffic conditions. The Project would replace and redesign curbs for Americans with Disabilities Act (ADA) compliance. New pedestrian curb ramps would be installed where required by access law, allowing individuals with a disability to cross the street. Existing curb ramps may also be replaced, if necessary, to meet current City and ADA standards. At some locations, additional sidewalk and curb replacement may be included where necessary to create a transition to the ramp in compliance with access law. The Project would not include any new driveways or introduce new vehicular access. Therefore, the operational traffic from the Project along roadways would not increase hazards due to a geometric design feature or incompatible uses.

Access for construction-related traffic (workers and trucks) to the site would be from and along the existing roadways. All required administrative, staging, storage, and laydown areas related to Project construction would be located near the Project area following standard construction practices. A Public Right of Way permit would be issued prior to the start of construction within the public ROW to ensure safe and efficient circulation of vehicular, bicycle, and pedestrian traffic through or around construction areas, particularly during trenching or tunneling, as required by SDMC Section 129.0702. A traffic control plan (TCP) would be prepared and implemented in accordance with the California Manual on Uniform Traffic Control Devices (CA MUTCD). Flag persons would be in place as needed to control and direct traffic safely through the areas to ensure that only temporary, short-duration traffic delays would occur. No long-term impacts associated with traffic hazards are anticipated, therefore, impacts would be **less than significant**.

Issue 4: Would the Project result in inadequate emergency access?

Impact Threshold

According to CEQA Guidelines Appendix G, transportation impacts may be significant if a project would result in inadequate emergency access.

Analysis

Emergency access requirements are established in the City's Fire Code. The Project is located in an established, developed urbanized area with ample access for emergency service providers.

Construction activities would occur in the Project area. A traffic control plan/permit would be implemented for any lane closures in the public ROW or driveway closures that would impact adopted emergency access or response plans. The contractor would follow standard construction practices and ensure adequate on-site circulation and access is always maintained for all users. Therefore, the Project would not create significant impediments for emergency access, and the impact would be **less than significant**.

4.8.7 SIGNIFICANCE OF IMPACTS

Regarding Issues 1 through 4, impacts associated with the proposed Project would be **less than significant.**

4.8.8 MITIGATION, MONITORING, AND REPORTING

Impacts would be **less than significant**, and no mitigation is required.

4.8.9 SIGNIFICANCE AFTER MITIGATION

Impacts would be **less than significant**, and no mitigation is required.

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4.9 SOLID WASTE

4.9.1 INTRODUCTION

This section describes the existing solid waste setting of the City of San Diego (City) Utilities Undergrounding Program (Project), identifies the applicable regulatory framework, evaluates potential impacts associated with solid waste that would result from the Project, identifies mitigation measures, if necessary, to reduce the level of impact associated with implementation of the Project, and identifies the level of significance after mitigation. Information in this section is from applicable environmental plans, including the *City of San Diego General Plan*, San Diego Municipal Code, and Community Plans.

4.9.2 EXISTING CONDITIONS

The City implements integrated solid waste management strategies that emphasize waste reduction and recycling, composting, and environmentally sound landfill management to meet the City's long-term disposal needs. The primary focus of the City's solid waste management planning is preventing materials from entering the waste stream through Citywide source reduction and recycling. The City's Recycling Ordinance, adopted in November 2007 and updated in 2022, describes local waste management policies and programs. Composting programs expand and build upon the City's Recycling Ordinance and help to divert organic waste from landfills. This emphasis is consistent with federal law under the Resource Conservation and Recovery Act (RCRA), Subtitle D, and the California Integrated Waste Management Act. These waste reduction programs are detailed in the City's *Source Reduction and Recycling Element* planning document, which is updated annually.

The City operates the West Miramar Landfill, located on Marine Corps Air Station Miramar. Approximately 1.4 million tons of waste is disposed at the West Miramar Landfill every year (City of San Diego 2024a). Operation of the facility requires a solid waste facility permit, issued by the City's Local Enforcement Agency, which reports to the California Department of Resources Recycling and Recovery (CalRecycle). The West Miramar Landfill has a current permitted site capacity of 97,354,735 cubic yards and is permitted for a daily throughput of 8,000 tons (CalRecycle 2024a). The estimated cease operation date for the West Miramar Landfill is 2031 (CalRecycle 2024a).

Currently, the only other landfill that provides disposal capacity within the urbanized region is the City's Sycamore Landfill. The Sycamore Landfill is located to the east of the West Miramar Landfill, within the City's jurisdictional boundaries. The Sycamore Landfill has a maximum permitted throughput of 5,000 tons per day (CalRecycle 2024b). The landfill has a maximum capacity of 147,908,000 cubic yards and is estimated to close in 2042 (CalRecycle 2024b).

4.9.3 REGULATORY SETTING

Federal

Resource Conservation and Recovery Act

The Environmental Protection Agency describes RCRA as follows (EPA 2024):

> RCRA gives EPA the authority to control hazardous waste from the "cradle-to-grave." This includes the generation, transportation, treatment, storage and disposal of hazardous waste. To achieve this, EPA develops regulations, guidance and policies that ensure the safe management and cleanup of solid and hazardous waste, and programs that encourage source reduction and beneficial reuse….Non-hazardous solid waste is regulated under Subtitle D of RCRA. Regulations established under Subtitle D ban open dumping of waste and set minimum federal criteria for the operation of municipal waste and industrial waste landfills, including design criteria, location restrictions, financial assurance, corrective action (cleanup), and closure requirement. States play a lead role in implementing these regulations and may set more stringent requirements. In absence of an approved state program, the federal requirements must be met by waste facilities.

State

California Integrated Waste Management Act (AB 939)

The California Integrated Waste Management Act was enacted by the California legislature in 1989 with the goal of reducing dependence on landfills for the disposal of solid waste and to ensure an effective and coordinated system for the safe management of all solid waste generated within the state. Assembly Bill (AB) 939 mandated a reduction in the amount of solid waste disposed of by jurisdictions and required diversion goals of 25% by 1995 and 50% by the year 2000. The Integrated Waste Management Act established a hierarchy of preferred waste management practices, which include (1) source reduction, (2) recycling and composting, and (3) environmentally safe disposal by transformation or landfilling. It addresses all aspects related to solid waste regulation, including the details regarding the lead enforcement agency's requirements and responsibilities; the permit process, including inspections and denials of permits; enforcement; and site cleanup and maintenance. It requires that each county prepare a countywide integrated waste management plan that is reviewed at least once every 5 years to assure that waste management practices remain consistent with the practices defined in the California Public Resources Code (PRC). In 2013, AB 341 increased the waste diversion target to 75% by 2020.

Waste Management (AB 1594)

Alternative daily cover (ADC) is cover material other than earthen material placed on the surface of the active face of a municipal solid waste landfill at the end of each operating day to control vectors, fires, odors, blowing litter, and scavenging. CalRecycle has approved 11 ADC material types that can currently be reported as diversion: ash, cement, kiln dust, treated auto shredder waste, construction waste, demolition waste, compost, green material, contaminated sediment, sludge, and shredded tires. Generally, these materials must be processed so that they do not allow gaps in the exposed landfill face (CalRecycle 2024c).

Pursuant to PRC Section 41781.3 and AB 1594, beginning January 1, 2020, the use of green material as ADC will not constitute diversion through recycling and will be considered disposal. "Green material" is defined as any plant material that is either separated at the point of generation or separated at a centralized facility that employs methods to minimize contamination. Green material includes, but is not limited to, yard trimmings, untreated wood wastes, paper products, and natural fiber products. Green material does not include treated wood waste, mixed demolition or mixed construction debris, or manure and plant waste from the food processing industry, alone or blended with soil. As of August 1, 2018, local jurisdictions are required to include information in an annual report on how the local jurisdiction intends to address the diversion requirements and divert green material that is being used as ADC. A jurisdiction that does not meet certain diversion requirements as a result of not being able to claim diversion for the use of green material as ADC would be required to identify and address, in an annual report, barriers to recycling green material and, if sufficient capacity at facilities that recycle green material is not expected to be operational before a certain date, to include a plan to address those barriers.

California Solid Waste: Diversion (AB 341)

AB 341, adopted in 2011, amended AB 939 by making a legislative declaration that it is the policy goal of the State of California that not less than 75% of solid waste generated be reduced, recycled, or composted by the year 2020. While a policy goal may not be legally enforceable, city and/or county ordinances and other mechanisms make AB 341 provisions enforceable within their jurisdictions. AB 341 also required a business (defined to include a commercial or public entity) that generates more than 8 cubic yards of commercial solid waste per week or is a multifamily residential dwelling of five units or more to arrange for recycling services, starting July 1, 2012.

Short-Lived Climate Pollutants: Organic Waste Methane Emissions Reductions (SB 1383)

Senate Bill (SB) 1383 establishes methane emissions reduction targets in a statewide effort to reduce emissions of short-lived climate pollutants in various sectors of California's economy. The law codifies the California Air Resources Board's *Short-Lived Climate Pollutant Reduction Strategy*, established pursuant to SB 605, to achieve reductions in the statewide emissions of short-lived

climate pollutants. Actions to reduce short-lived climate pollutants are essential to address the many impacts of climate change on human health, especially in California's most at-risk communities, and on the environment. SB 1383 establishes targets to achieve a 50% reduction in the level of the statewide disposal of organic waste from the 2014 level by 2020 and a 75% reduction by 2025. The law grants CalRecycle the regulatory authority required to achieve the organic waste disposal reduction targets and establishes an additional target that not less than 20% of currently disposed edible food is recovered for human consumption by 2025 (CalRecycle 2024d).

Local

City of San Diego General Plan

The *City of San Diego General Plan* Public Facilities, Services, and Safety Element (City of San Diego 2024b) contains goals and policies related to the provision of public services within the City limits. Applicable policies include those listed below.

- PF-I.1.c. Encourage waste reduction and recycling with source-separated collection of materials.
- PF-I.2. Maximize waste reduction and diversion.
- PF-I.2.f. Reduce and recycle Construction and Demolition debris.
- PF-I.2.g. Strive for recycling of 100 percent of inert Construction and Demolition materials and a minimum of 50 percent by weight of all other material.
- PF-I.2.h. Use recycled, composted, and post-consumer materials in manufacturing, construction, public facilities and in other identified uses whenever appropriate.
- PF-I.3.g. Maximize environmental benefit in landfill-based waste diversion and effective load check programs by ensuring that recyclable or hazardous materials do not end up in the landfill.

City of San Diego Zero Waste Plan: Road to Zero Waste, Next Stop 75%

State of California regulations for solid waste (PRC Section 41700 et seq.) require that each region have a plan with adequate capacity to manage or dispose of solid waste for at least 15 years into the future. The City's *Zero Waste Plan* (City of San Diego 2015) establishes goals to target 75% diversion by 2020, 90% diversion by 2035, and 0% diversion by 2040 and outlines potential diversion strategies to help the City achieve these goals.

The "Whitebook," Standard Specifications for Public Works Construction

The City created *The "Whitebook," Standard Specifications for Public Works Construction* (City of San Diego 2021), a supplement that takes precedence over the specification language contained in

the *Greenbook, Standard Specifications for Public Works Construction* and addresses the unique conditions in the City that are not addressed in the *Greenbook*. Specifically, Part 1 – General Provisions (B), Section 5-14 addresses construction and demolition waste management.

4.9.4 THRESHOLDS OF SIGNIFICANCE

The City's *California Environmental Quality Act (CEQA) Significance Determination Thresholds* (City of San Diego 2022) are based on CEQA Guidelines Appendix G. For the purposes of this analysis, the Project would have a significant environmental impact if it would:

Issue 1: 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

Issue 2: Conflict with federal, state, and local management and reduction statutes and regulations related to solid waste

4.9.5 APPROACH AND METHODOLOGY

The CEQA Guidelines (14 CCR 15000 et seq.) Appendix G checklist addresses capacity and constraints related to utilities and services systems, including water, stormwater, wastewater, electricity, natural gas, and solid waste. The City defines what is considered a significant impact in the *California Environmental Quality Act Significance Determination Thresholds*. The Project Notice of Preparation disclosed that potential impacts to solid waste may occur as a result of Project implementation. As such, this section specifically addresses potential impacts to solid waste service systems.

4.9.6 IMPACTS

Issue 1: Would the Project 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?

Issue 2: Would the Project conflict with federal, state, and local management and reduction statutes and regulations related to solid waste?

Impact Threshold

Regarding regulations applicable to public projects, the City's *CEQA Significance Determination Thresholds* state the following (City of San Diego 2022):

1. Public projects are required to adhere to City of San Diego Administrative Regulations and project specifications that require that the overall waste

produced is reduced sufficiently to comply with waste reduction targets established in the Public Resources Code. Furthermore, Council Policy 900-14 requires City projects to achieve the U.S. Green Building Council's LEED Silver standard for all new buildings and major renovations over 5,000 feet.

2. Projects complying with the City of San Diego Administrative Regulations are not required to prepare a Waste Management Plan.

Analysis

Temporary Construction Impacts

Construction of the Project would generate construction and demolition waste consisting of utility poles, wires, transformers, concrete, asphalt, soil, and small amounts of packaging material. Wooden utility poles have been treated with preservatives and fungicides to prevent damage and premature decomposition and therefore cannot be composted. All activities under the Project, including activities managed by the San Diego Gas & Electric Company (SDG&E), would be required to comply with federal, state, and local regulations regarding solid waste and disposal. Projects undertaken by the City would be required to implement the City's *Whitebook*, which addresses construction and demolition waste management. Compliance with the City's *Whitebook* would ensure **less-than-significant** impacts related to solid waste.

Permanent Operational Impacts

During operation, the Project would produce little solid waste aside from routine utility infrastructure maintenance activities. Under existing conditions, solid waste generated during normal operations of the aboveground utilities mainly consists of vegetation trimmings to avoid conflicts with the utility infrastructure. Once the lines have been installed underground, the volume of solid waste generated during operation would decrease relative to existing conditions. SDG&E and the telecommunication companies are responsible for the operation and maintenance of undergrounding projects under the Project. As such, SDG&E and the telecommunication companies would manage disposal of consumables in response to the City's *Zero Waste Plan*, which targets 75% waste diversion by 2020, 90% diversion by 2035, and 0% diversion by 2040 (City of San Diego 2015). In addition, operation of the Project would be required to comply with federal, state, and local regulations regarding waste management. Therefore, impacts would be **less than significant**.

4.9.7 SIGNIFICANCE OF IMPACTS

Impacts would be **less than significant** for Issues 1 and 2.

4.9.8 MITIGATION, MONITORING, AND REPORTING

No mitigation is required.

4.9.9 SIGNIFICANCE AFTER MITIGATION

Impacts related to solid waste would be **less than significant** during temporary construction and long-term operation of the Project.

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5 CUMULATIVE IMPACTS

Section 15355 of the California Environmental Quality Act (CEQA) Guidelines defines cumulative impacts as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." CEQA Guidelines Section 15130(b) states that "the discussion of cumulative impacts…need not provide as great detail as is provided for the effects attributable to the project alone." Section 15130(b) further states that a cumulative impacts discussion "should be guided by the standards of practicality and reasonableness."

Cumulative impacts can occur from the interactive effects of a single project. For example, the combination of noise and dust generated during construction activities can be additive and can have a greater impact than either noise or dust alone. However, substantial cumulative impacts more often result from the combined effect of past, present, and future projects located in proximity to a proposed project. Thus, it is important for a cumulative impacts analysis to be viewed over time and in conjunction with other related past, present, and reasonably foreseeable future projects, the impacts of which might compound or interrelate with those of the project under review.

As provided by CEQA Guidelines Section 15130(b)(1), the evaluation of cumulative impacts is to be based on either of the following:

> (A) A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency, or
>
> (B) A summary of projections contained in an adopted local, regional or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect. Such plans may include: a general plan, regional transportation plan, or plans for the reduction of greenhouse gas emissions. A summary of projections may also be contained in an adopted or certified prior environmental document for such a plan. Such projections may be supplemented with additional information such as a regional modeling program. Any such document shall be referenced and made available to the public at a location specified by the lead agency.

Pursuant to CEQA Guidelines Section 15130(d), cumulative impact discussions may rely on previously approved land use documents such as general plans, specific plans, plans for the reduction of greenhouse gas (GHG) emissions, and local coastal plans, which may be incorporated by reference. In addition, no further cumulative impact analysis is required when a project is consistent with such plans and the lead agency determines that the regional or area-wide cumulative impacts of the proposed project have already been adequately addressed in a certified Environmental Impact Report (EIR) for that plan. In addition, CEQA Guidelines Section 15130(e)

states that "[i]f a cumulative impact was adequately addressed in a prior EIR for a community plan, zoning action, or general plan, and the project is consistent with that plan or action, then an EIR for such a project should not further analyze that cumulative impact, as provided in Section 15183(j)."

For the analysis of cumulative impacts associated with the City of San Diego (City) Utilities Undergrounding Program (Project), the cumulative geographic area primarily includes the City, since the underground utilities that would be built and maintained under the Project are located within the City's boundaries, but would also include cities bordering where the projects are located such as Imperial Beach, Chula Vista, National City, Lemon Grove, La Mesa, El Cajon, Poway, and Escondido. Additionally, the cumulative geographic area would include surrounding areas in unincorporated San Diego County due to their proximity to the City. Due to the programmatic nature of the Project, this cumulative impact analysis relies on adopted planning documents, consistent with CEQA Guidelines Section 15130(b)(1)(B), as well as other past, present, and probable future projects, City Capital Improvement Program projects primarily related to utility infrastructure, and private development with potential for impacts to similar issue areas.

5.1 PLANS, PROGRAMS, AND PROJECTS EVALUATED FOR CUMULATIVE IMPACTS

Consistent with CEQA Guidelines Section 15130(b)(1)(B), this cumulative impact analysis relies primarily on the cumulative impact analysis of the *City of San Diego General Plan Program Environmental Impact Report*, which concluded that implementation of the City's General Plan would result in significant and unavoidable cumulative impacts to the following environmental issue areas: aesthetics, air quality, biological resources, cultural resources, historical resources, noise, paleontological resources, population and housing, public services, recreation, tribal cultural resources, utilities and service systems, and wildfire (City of San Diego 2024).

In addition to the *City of San Diego General Plan*, the General Plan for unincorporated San Diego County, the *City of San Diego Multiple Species Conservation Program (MSCP) Subarea Plan* and *Vernal Pool Habitat Conservation Plan* (VPHCP), *the County of San Diego MSCP Subarea Plan,* the City of San Diego Land Development Code, the *Draft San Diego Association of Governments' San Diego Forward: The Regional Plan*, the *San Diego International Airport – Airport Land Use Compatibility Plan*, and the *Integrated Natural Resources Management Plan 2011–2015*, among others, were used to evaluate cumulative impacts.

In addition to the plans and projects listed above, certain projects have been included in the cumulative impacts analysis for specific resource areas. Table 5-1 provides a list of plans, programs, and projects used for the analysis of cumulative impacts.

Table 5-1
Cumulative Plans, Programs, and Projects

Project Name	Jurisdiction	Description	Status/Timing	Potential Significant and Unavoidable Impacts
Plans				
Brown Field Municipal Airport Master Plan (AMP)	City of San Diego	The City of San Diego (City) operates Brown Field Municipal Airport (SDM) in Otay Mesa. As of 2017, the AMP has guided 20 years of development, including a new terminal, hangars, parking, and airside improvements.	Notice of Preparation of Program Environmental Impact Report (PEIR), February 7, 2019; the Brown Field AMP Environmental Impact Report (EIR) should be certified by late spring or summer 2025	To be determined
Montgomery-Gibbs Executive AMP	City of San Diego	The City operates Montgomery-Gibbs Executive Airport (MYF) in Kearny Mesa. In 2017, the City began an AMP to guide 20 years of development, including new hangars, terminal expansion, parking, and airside improvements.	Notice of Preparation of PEIR, February 7, 2019	To be determined
Metropolitan Air Park	City of San Diego	This project is occurring within the Brown Field Municipal Airport in San Diego. Metropolitan Air Park is developing 331 acres with general aviation and non-aviation facilities, including offices, hotels, restaurants, an air and space museum, industrial and commercial space, a fueling	Draft Environmental Impact Report (DEIR) certified and adopted November 2024	Aesthetics, air quality, biological resources, cultural resources, cumulative effects, drainage/absorption, geology/soils, hazards and hazardous materials, hydrology/water quality,

Table 5-1
Cumulative Plans, Programs, and Projects

Project Name	Jurisdiction	Description	Status/Timing	Potential Significant and Unavoidable Impacts
		station, and a solar energy generation facility.		land use/planning, noise, population/housing, public services, sewer capacity, solid waste, transportation, vegetation, wetland/riparian, wildlife, greenhouse gas (GHG), energy conservation
City General Plan	City of San Diego	The General Plan sets out a long-range, comprehensive framework for how the City will grow and develop, provide public services, and maintain the qualities that define San Diego over the next 20 to 30 years.	Final Environmental Impact Report (FEIR) certified and plan adopted in March 2008; horizon year 2030; plan amended in 2023	Agricultural resources, air quality, biological resources, geologic conditions, health and safety, historical resources, hydrology, land use, mineral resources, noise, paleontological resources, population and housing, public facilities, public utilities, traffic, visual effects/neighborhood character, water quality
Blueprint SD	City of San Diego	Revisions to the General Plan to incorporate the City's climate action	FEIR certified and plan adopted in July 2024	Aesthetics, air quality, biological resources,

Table 5-1
Cumulative Plans, Programs, and Projects

Project Name	Jurisdiction	Description	Status/Timing	Potential Significant and Unavoidable Impacts
		goals and the new vision of the San Diego Association of Governments (SANDAG) for the region's transportation system and to provide a Citywide framework to guide and focus future land use changes in each community.		cultural resources, noise, hydrology, public services, recreation, transportation, tribal cultural resources, utilities and service systems, wildfire
City Land Development Code (LDC)	City of San Diego	The LDC is one of the tools used to implement the General Plan and community plans, which establish the pattern and intensity of land use throughout the City. The LDC consolidates all development regulations into a sequence of four chapters of the San Diego Municipal Code.	FEIR certified and code adopted in 1997; 2024 LDC update approved July 1 and effective September 2024	Soils/erosion hazards, air quality, hydrology/water quality, biology, land use agricultural land and mineral resources, transportation/circulation, neighborhood character/ aesthetics (landform alteration), historical resources, paleontological resources, human health and public safety (vectors)
County (County) of San Diego General Plan	County of San Diego (unincorporated)	The General Plan will direct population growth balanced with infrastructure needs, development, and resource protection. The General Plan also includes updates to Community and Subregional Plans.	FEIR certified and plan adopted in 2011; horizon year 2030	Aesthetics, agricultural resources, air quality, biological resources, hazards and hazardous materials, hydrology and water quality, mineral resources, noise, public

Table 5-1
Cumulative Plans, Programs, and Projects

Project Name	Jurisdiction	Description	Status/Timing	Potential Significant and Unavoidable Impacts
				services, transportation and traffic, utilities and service systems
City Multiple Species Conservation Program (MSCP) Subarea Plan	City of San Diego	The City's MSCP Subarea Plan was prepared pursuant to the general outline developed by the United States Fish and Wildlife Service and the California Department of Fish and Wildlife (CDFW) to meet the requirements of the California Natural Communities Conservation Planning Act of 1992. This Subarea Plan forms the basis for the implementing agreement that is the contract between the City and the wildlife agencies that ensures implementation of the Subarea Plan and thereby allows the City to issue "take" permits at the local level.	FEIR/Environmental Impact Statement (EIS) certified and plan adopted in March 1997	Land use, biology
County MSCP Subarea Plan	County of San Diego	The County's MSCP Subarea Plan is a comprehensive, long-term habitat conservation plan that addresses the needs of multiple species and the preservation of natural vegetation communities in San Diego County. The MSCP addresses the potential impacts	FEIR/EIS certified and plan adopted in October 1997	Land use, biology

Table 5-1
Cumulative Plans, Programs, and Projects

Project Name	Jurisdiction	Description	Status/Timing	Potential Significant and Unavoidable Impacts
		of urban growth, natural habitat loss, and species endangerment and creates a plan to mitigate for the potential loss of Covered Species and their habitat due to the direct impacts of future development of public and private lands within the MSCP area.		
SANDAG Regional Comprehensive Plan (RCP)	SANDAG	The RCP is a long-term planning framework for the San Diego region. The plan balances population, housing, and employment growth with habitat preservation, agriculture, open space, and infrastructure needs within the San Diego region. The plan provides a long-term context for guiding future growth in the San Diego region.	FEIR certified and plan adopted in July 2004	Land use, population/housing/ employment, transportation/ circulation, energy, geology, paleontology, biological resources, cultural resources
SANDAG San Diego Forward: The Regional Plan	SANDAG	The proposed Regional Plan is an update to the RCP for the San Diego region and the 2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), combined into one document. The 2050 RTP/SCS is the blueprint for a regional transportation system, serving existing and projected residents and workers within the San Diego region	FEIR and plan released December 2021; horizon year 2050	Aesthetics; agricultural and forestry resources; air quality; biology; cultural and paleontological resources; energy; geology, soils, and mineral resources; GHG emissions; hazards and hazardous materials;

Table 5-1
Cumulative Plans, Programs, and Projects

Project Name	Jurisdiction	Description	Status/Timing	Potential Significant and Unavoidable Impacts
		over the next 40 years to further enhance quality of life and offer more mobility options for people and goods. The SCS serves to align regional transportation, housing, and land use plans to reduce the amount of vehicle miles traveled to attain the regional GHG reduction targets established by the California Air Resource Board.		land use; noise and vibration; population and housing; public services and utilities; transportation; water supply
San Diego International Airport – Airport Land Use Compatibility Plan (ALUCP)	San Diego County Regional Airport Authority	This ALUCP provides airport land use compatibility policies and standards related to four airport-related factors: noise, safety, airspace protection, and overflight.	FEIR certified and plan adopted in April 2014; draft update released June 2024	Land use and planning, population and housing
Integrated Natural Resources Management Plan (INRMP)	Marine Corps Air Station (MCAS) Miramar	The INRMP for MCAS Miramar guides implementation of the natural resources program. The INRMP integrates the land use needs of the air station in support of its military mission with the management and conservation of natural resources. The INRMP establishes MCAS Miramar's approach and guidelines relative to natural resources to accomplish this end.	Finding of No Significant Impact adopted June 2018	None

Table 5-1
Cumulative Plans, Programs, and Projects

Project Name	Jurisdiction	Description	Status/Timing	Potential Significant and Unavoidable Impacts
Morena Corridor Specific Plan	City of San Diego	The Morena Corridor Specific Plan identifies land uses, urban design policies, and transportation and infrastructure improvements for the area along Morena Boulevard, around the future Tecolote and Clairemont Drive trolley stations, and the commercial and industrial lands within the southwest area of Linda Vista. The Morena Corridor Specific Plan would allow for increased residential density in Linda Vista and transit-oriented development adjacent to the future trolley stations.	FEIR certified and plan adopted in September 2019	Transportation and circulation, noise, air quality, historic and tribal cultural resources, paleontological resources, visual effects and neighborhood character
San Diego International Airport Development Plan	San Diego County Regional Airport Authority	The Airport Development Plan provides a development framework to implement improvements that will enable the airport to accommodate future demand for air travel anticipated to occur at San Diego International Airport.	FEIR released January 2020	Air quality, GHG emissions, cultural resources, land use and planning, noise, traffic and circulation, cumulative impacts (air quality)
University of California (UC) San Diego 2018 Long Range Development	UC San Diego	The LRDP is a general land use plan that guides the physical development of the campus. The LRDP outlines the possibilities for growth in a way that acknowledges the campus's historic foundations, natural beauty, and	FEIR released November 2018	Air quality, cultural and tribal cultural resources, population and housing, transportation/traffic, cumulative impacts (air quality, cultural

Table 5-1
Cumulative Plans, Programs, and Projects

Project Name	Jurisdiction	Description	Status/Timing	Potential Significant and Unavoidable Impacts
Plan (LRDP), La Jolla Campus		unique character while ensuring that UC San Diego can continue to advance its mission.		resources and tribal cultural resources, population and housing, transportation/traffic)
Balboa Avenue Station Area Specific Plan	City of San Diego	The proposed Balboa Avenue Station Area Specific Plan would increase residential density by redesignating and rezoning lands to allow for transited-oriented development adjacent to the Balboa Avenue trolley station.	FEIR certified and plan adopted in September 2019; amendment to the plan certified in December 2021	Air quality, historical and tribal cultural resources, noise, paleontological resources, cumulative impacts (transportation/ circulation)
University of San Diego Master Plan Update	City of San Diego	Comprehensive revision of the 1996 University of San Diego Master Plan and Design Guidelines, as well as the campus's building space and infrastructure needs associated with increasing enrollment from 7,000 to 10,000 full-time-equivalent students over the next 20 years.	Final Subsequent EIR released May 2017	Transportation/ circulation, cumulative impacts (transportation/ circulation, air quality)
Campus Point Master Plan	City of San Diego	Intensification of an existing 731,725-square-foot scientific research and development facility by 328,383 square feet, thereby creating a 1,060,108-square-foot science and business park, characterized by a campus-like	Final Supplemental EIR released April 2017	Traffic circulation

Table 5-1
Cumulative Plans, Programs, and Projects

Project Name	Jurisdiction	Description	Status/Timing	Potential Significant and Unavoidable Impacts
		environment, with comprehensive site design and substantial landscaping.		
Barrio Logan Community Plan Update	City of San Diego	Comprehensive update to the current adopted 1978 Barrio Logan/Harbor 101 Community Plan. The 2013 Community Plan Update was rescinded in 2014.	FEIR released May 2, 2013; plan adopted in December 2023	Land use, air quality, noise, cultural resources, paleontological resources, GHG emissions, hydrology
Clairemont Mesa Community Plan Update	City of San Diego	Comprehensive update to the Clairemont Community Plan that will result in a plan for future growth and development for the next 20 years that is specific to the Clairemont community and will identify a vision and strategies to support community character.	Draft Community Plan released May 2021	Air quality, biological r, energy conservation, geology and soils, GHG emissions, historical resources (built environment, archaeology, and tribal cultural resources), hazards and hazardous materials, hydrology and water quality, land use, noise, paleontological resources, population and housing, public services and facilities and recreation, public utilities, transportation/ circulation, visual effects

Table 5-1
Cumulative Plans, Programs, and Projects

Project Name	Jurisdiction	Description	Status/Timing	Potential Significant and Unavoidable Impacts
				and neighborhood character
Kearny Mesa Community Plan Update	City of San Diego	The updated Community Plan for Kearny Mesa will provide clear direction for the future development of the community over the next 20 years.	Final PEIR and community plan adopted 2020	Cultural resources, public services, public utilities
Mira Mesa Community Plan Update	City of San Diego	The updated Community Plan will take into account current conditions, Citywide goals in the Climate Action Plan and the General Plan, and community-specific goals to provide direction for the long-term development of the community over the next 20 to 30 years.	FEIR released May 2, 2013; plan approved in December 2023	Air quality and odor; historical, archaeological, and tribal cultural resources; noise; public services and facilities; public utilities (utilities); transportation, visual effects and neighborhood character
Mission Valley Community Plan Update	City of San Diego	The Community Plan Update is the blueprint for the future development of the neighborhood.	Plan approved June 20, 2019, and adopted September 2019	Air quality; historical, cultural, and tribal cultural resources; hydrology and water; noise; public services and facilities; public utilities and infrastructure; transportation

Table 5-1
Cumulative Plans, Programs, and Projects

Project Name	Jurisdiction	Description	Status/Timing	Potential Significant and Unavoidable Impacts
Old Town San Diego Community Plan Update	City of San Diego	The Community Plan Update provides land use designations and policies that will help guide future development in the community.	Plan approved July 26,2018 and adopted October 2018	Land use, air quality, noise, cultural resources, paleontological resources, GHG emissions, hydrology
Midway-Pacific Highway Community Plan Update	City of San Diego	The Community Plan Update provides detailed, community-specific policy direction to implement the General Plan with respect to the distribution and arrangement of land uses (public and private); the street, multimodal mobility, and transit network; provision of parks and public facilities; community-wide and site-specific urban design guidelines; and recommendations to preserve and enhance historic and cultural resources within the Midway-Pacific Highway community.	FEIR released December 2017; adopted September 2018	Transportation and circulation, historical and tribal cultural resources, noise, paleontological resources
University Community Plan Update	City of San Diego	The updated Community Plan will consider current conditions, Citywide goals in the Climate Action Plan and the General Plan, and community-specific goals to provide direction for	Plan was adopted in July 2024; draft plan released July 2024	Aesthetics, air quality, biological resources, cultural resources, noise, hydrology, public services, recreation, transportation, tribal cultural resources,

Table 5-1
Cumulative Plans, Programs, and Projects

Project Name	Jurisdiction	Description	Status/Timing	Potential Significant and Unavoidable Impacts
		the long-term development of the community.		utilities and service systems, wildfire
Projects				
City Capital Improvement Program (CIP)	City of San Diego Public Works Department	The CIP involves design, permitting, and construction of various infrastructure improvement projects, including airports, bikeways, bridges, stormwater facilities, libraries, parks, public safety facilities, street/sidewalk improvements, utility undergrounding, water, and sewer. The CIP is subject to ongoing updates and currently includes approximately 156 stormwater CIP projects, including "green" infrastructure, low-impact development, storm drain replacements, and stream restoration/mitigation. Stormwater CIPs are identified through various programs, including Water Quality Improvement Plans, Comprehensive Load Reduction Plans, Watershed Asset Management Plans, and Watershed Master Plans. A current list of CIPs can be accessed at	Ongoing	Biological resources, cultural resources, water quality

Table 5-1
Cumulative Plans, Programs, and Projects

Project Name	Jurisdiction	Description	Status/Timing	Potential Significant and Unavoidable Impacts
		https://www.sandiego.gov/cip/projectinfo.		
North City Project, Pure Water San Diego Program	City of San Diego	The North City Pure Water Project is the first phase of the City's Pure Water Program. The project is designed to augment Miramar Reservoir, which is a source of domestic drinking water supply, with 30 million gallons per day of purified water produced at the future North City Pure Water Facility.	FEIR/EIS certified in April 2018; project started in April 2021 with completion anticipated in 2025	Noise; transportation, circulation, and parking
The Preserve at Torrey Highlands	City of San Diego	The Preserve at Torrey Highlands Project involves construction of three office buildings composed of an 180,000-square-foot, six-story building; a 120,000-square-foot, four-story building that would include a 5,000-square-foot fitness center; a 150,000-square-foot, five-story building; an amenity building that would include a 3,850-square-foot cafe; and a 180,000-square-foot, seven-story parking garage with one level below grade and surface parking. Each office building would include subterranean parking spaces.	FEIR released March 2019	Transportation/ circulation, visual effects and neighborhood character, GHG emissions

Table 5-1
Cumulative Plans, Programs, and Projects

Project Name	Jurisdiction	Description	Status/Timing	Potential Significant and Unavoidable Impacts
The Inn at Sunset Cliffs	City of San Diego	The project involves authorization of previously unpermitted repairs and changes to a cliffside deck at an existing hotel.	Mitigated Negative Declaration (MND) released August 2022	None
Morena Apartment Homes Project	City of San Diego	The project involves construction of 150 market-rate multifamily units with an approximately 4,400-square-foot clubhouse facility, recreational facility, landscaped areas, a pool and pool house building, and a water quality detention basin.	FEIR released August 2018	None
Costa Verde Revitalization Project	City of San Diego	The revitalization project involves reconfiguration and expansion of the existing Costa Verde Center to create a local, walkable hub that provides community gathering spaces, additional retail shops, restaurants, office space, neighborhood services, and a 200-room hotel.	FEIR released September 2020; Notice of Extension of Time (NOT) January 30, 2024	Noise, transportation/ circulation

Table 5-1
Cumulative Plans, Programs, and Projects

Project Name	Jurisdiction	Description	Status/Timing	Potential Significant and Unavoidable Impacts
Mid-Coast Corridor Transit Project	SANDAG	The project includes extension of the Trolley Blue Line service and associated improvements that would improve transit service between downtown San Diego, Old Town, and University City.	Final Supplemental EIS/EIR released September 2014; Record of Decision issued October 2014; construction commenced fall 2016; operation began in 2021	Transportation, air quality, noise and vibration, paleontological resources, cumulative impacts (transportation, air quality)
North Torrey Pines Living and Learning Neighborhood Project	UC San Diego	The project is a mixed-use development containing undergraduate housing, academic and administrative space, community and open space, and underground parking in the west campus of UC San Diego. Three of the buildings would be primarily residential, and three would contain a mix of educational, community, and residential uses.	EIR certified March 2018; became operational 2020–2021	Transportation and traffic, cumulative impacts (transportation and traffic)
University Towne Center Revitalization Project (Westfield Redevelopment Project)	City of San Diego	The revitalization project involves renovation and expansion of retail uses by 750,000 square feet of new retail and the development of 250 multifamily residential units. Alternatively, the applicant has the option to implement a mix of land-use scenarios that could include a	FEIR released April 2008	Aesthetics/visual quality, transportation/ circulation, air quality, cumulative impacts (transportation/ circulation, air quality,

Table 5-1
Cumulative Plans, Programs, and Projects

Project Name	Jurisdiction	Description	Status/Timing	Potential Significant and Unavoidable Impacts
		reduction in new retail and the addition of up to 725 residential dwelling units, up to 250 hotel rooms, and/or up to 35,000 square feet of office space. Additional project features would include a relocated and expanded bus transit center, reservation of right-of-way for the proposed transit center and planned extension of a light rail transit line, and certification under the Leadership in Energy and Environmental Design (LEED) Green Building Rating System.		public utilities [landfill capacity])
Mesa Housing Nuevo West and East Project	UC San Diego	The project includes two campus student housing developments (Nuevo West and Nuevo East) and a parking structure, located on separate but proximate sites within the east campus Mesa Housing Neighborhood. Nuevo West would redevelop an approximately 6.2-acre site, replacing existing low-density housing with 802 new student beds and 82 new beds for the UC San Diego Family House. The parking structure would be developed on an adjacent 3.2-acre site. Nuevo	Final Tiered EIR released October 2017	None

Table 5-1
Cumulative Plans, Programs, and Projects

Project Name	Jurisdiction	Description	Status/Timing	Potential Significant and Unavoidable Impacts
		East would redevelop an approximately 13.2-acre site, replacing existing low-density student housing with 1,374 new beds. Utility and roadway improvements associated with the project are also proposed along and in the vicinity of Miramar Street and Athena Circle and would include constructing an internal campus connection between Miramar Street and Athena Circle.		
Carroll Canyon Mixed-Use Project	City of San Diego	The project involves redevelopment of the existing office complex with a mixed-use development that would include multifamily residential units, small retail shops, and restaurants. The existing 76,241 square feet of office buildings and associated facilities would be demolished and replaced with up to 260 multifamily residential units and approximately 10,700 square feet of commercial retail space.	FEIR certified June 2017	Cumulative impacts (transportation/traffic circulation)
Candlelight Development Project	City of San Diego	The Candlelight Development Project includes and application for a Planned Development Permit, Site Development Permit, and Tentative Map to subdivide	FEIR released April 2018	Cumulative impacts (transportation/ circulation)

Table 5-1
Cumulative Plans, Programs, and Projects

Project Name	Jurisdiction	Description	Status/Timing	Potential Significant and Unavoidable Impacts
		a 44.19-acre parcel in the Otay Mesa area of San Diego into three multifamily residential lots totaling 26.33 acres and two open space lots. As part of the project, the applicant would grant conservation easements over both open space lots in fee title to a CDFW-approved agency. The project also includes a trail easement, trail, and trail access improvements.		
Merge 56 Development Project	City of San Diego	The project is composed of two major components. The first component is a 41.34-acre mixed-use development (including internal private road improvements) that consists of a mixed-use center containing commercial, office, hotel, and residential uses on a triangular-shaped property, including 525,000 square feet of commercial, office, theater/cinema, and hotel uses and 242 residences (i.e., 158 multifamily and 84 single-family). The second part of the project is composed of 31 acres of public road improvements to complete undeveloped segments of Camino del	FEIR released February 2018; Addendum to EIR released September 2023	Visual effects/neighborhood character, cumulative impacts (transportation/ circulation)

Table 5-1
Cumulative Plans, Programs, and Projects

Project Name	Jurisdiction	Description	Status/Timing	Potential Significant and Unavoidable Impacts
		Sur and Carmel Mountain Road, which are Circulation Element roads.		
Alexan Fashion Valley Project	City of San Diego	The project includes a site development permit and planned development permit to demolish existing structures (35,699 square feet) and on-site surface parking and construction of a mixed-used development composed of 284 dwelling units, 5,760 square feet of commercial (office use), and 3,170 square feet of commercial (restaurant use) within the Mission Valley Community Plan area. The project would range in height from four stories to five stories and would have a total of 284 residential units and 8,897 square feet of commercial space (office and restaurant). A total of 408 parking spaces would be provided in a six-story, aboveground parking structure, in addition to 67 surface parking spaces, for a total of 475 parking spaces.	FEIR released July 2017	None

Table 5-1
Cumulative Plans, Programs, and Projects

Project Name	Jurisdiction	Description	Status/Timing	Potential Significant and Unavoidable Impacts
Town & Country Project	City of San Diego	The project involves construction of a mixed-use transit-oriented development through the consolidation, renovation, and infill development of the existing Town and Country Hotel through a master plan that would establish three districts: park district, residential district, and hotel district. The master plan elements include a renovation of portions of the hotel and convention buildings while demolishing other structures to accommodate construction of new hotel facilities and residential uses.	FEIR released May 2017	Transportation/ circulation, historical resources
Legacy International Center Project	City of San Diego	The project involves redevelopment of the existing Mission Valley Resort Hotel property with a mixed-use development to include commercial, administrative, retail, and religious uses with a 63,447-square-foot pavilion (with restaurants, gift shops, a learning center, a theater, and a wellness center), a 41,071-square-foot Legacy Vision Center building (with a welcome center, catacombs, a dome theater, a	FEIR released April 2017	None

Table 5-1
Cumulative Plans, Programs, and Projects

Project Name	Jurisdiction	Description	Status/Timing	Potential Significant and Unavoidable Impacts
		museum, a gallery, and retail), a 7,783-square-foot souk (market), and a five-story 88,120-square-foot Legacy Village building (with 127 guest suites, a restaurant, and a wellness center). In addition, outdoor ancillary uses would include a city plaza, central plaza, a replica of the Western Wall, water feature, prayer garden, and pedestrian trail.		
Hillel Center for Jewish Life (HCJL) Project	City of San Diego	The project includes development of a permanent HCJL facility in two phases. Phase 1 would consist of the temporary use of an existing property as a space to provide for religious programs and construction of temporary parking. Phase 2 would consist of the construction of three individual buildings surrounded by an interior courtyard and a surface parking lot. Upon occupancy of Phase 2, the temporary use of the existing property would expire and revert to a single-dwelling unit use.	FEIR released March 2017	None

Table 5-1
Cumulative Plans, Programs, and Projects

Project Name	Jurisdiction	Description	Status/Timing	Potential Significant and Unavoidable Impacts
Heritage Bluffs II Project	City of San Diego	The project involves subdivision of the project site into 171 single-family lots, 3 open space lots, and 14 lots maintained by the Homeowner's Association, including two pocket parks.	FEIR released August 2016	Biological resources, landform alteration/visual quality, traffic, air quality, cumulative impacts (natural resources/ agriculture)

5.2 CUMULATIVE IMPACT ANALYSIS

As described in Chapter 6, Environmental Effects Found Not to Be Significant, of this Program EIR (PEIR), the Project would not have significant effects related to aesthetics/visual effects and neighborhood character, agriculture and forestry resources, energy, geology/soils, health and safety/hazards, hydrology and water quality, mineral resources, population/housing, public services and facilities, and utilities/service systems (excluding solid waste). Therefore, these issues are not further analyzed in the context of cumulative impacts, since the Project's incremental contribution would be negligible.

5.2.1 AIR QUALITY

Air pollution is largely a cumulative impact. The nonattainment status of regional pollutants is a result of past and present development, and the San Diego County Air Pollution Control District (SDAPCD) develops and implements plans for future attainment of ambient air quality standards. Based on these considerations, project-level thresholds of significance for criteria pollutants are relevant in the determination of whether a project's individual emissions would have a cumulatively significant impact on air quality.

The San Diego Air Basin (SDAB) has been designated as a federal nonattainment area for ozone (O_3) and a state nonattainment area for O_3, coarse particulate matter, and fine particulate matter. The air quality in the SDAB is the result of cumulative emissions from motor vehicles, off-road equipment, commercial and industrial facilities, and other emission sources. Projects that emit these pollutants or their precursors (i.e., volatile organic compounds and oxides of nitrogen for O_3) potentially contribute to worsened air quality. In analyzing cumulative impacts from a project, the analysis must specifically evaluate the project's contribution to the cumulative increase in pollutants for which the SDAB is designated as nonattainment for the California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS). If the project does not exceed thresholds and is determined to have less-than-significant project-specific impacts, it may still contribute to a significant cumulative impact on air quality if the emissions from the project, in combination with the emissions from other proposed or reasonably foreseeable future projects, are in excess of established thresholds. However, a project would only be considered to have a significant cumulative impact if the project's contribution accounts for a significant proportion of the cumulative total emissions (i.e., it represents a "cumulatively considerable contribution" to the cumulative air quality impact).

Regarding short-term construction impacts, the SDAPCD thresholds of significance are used to determine whether the Project may have a short-term cumulative impact. As shown in Table 4.1-7, the Project would not exceed any criteria air pollutant during construction. Therefore, the Project would have a less-than-significant cumulative impact during construction.

Additionally, for the SDAB, the Regional Air Quality Strategy (RAQS) serves as the long-term regional air quality planning document for the purpose of assessing cumulative operational emissions in the basin to ensure the SDAB continues to make progress toward NAAQS- and CAAQS-attainment status. As such, cumulative projects located in the San Diego region would have the potential to result in a cumulative impact to air quality if, in combination, they would conflict with or obstruct implementation of the RAQS. Similarly, individual projects that are inconsistent with the regional planning documents upon which the RAQS is based would have the potential to result in cumulative operational impacts if they represent development and population increases beyond regional projections.

Regarding long-term cumulative operational emissions in relation to consistency with local air quality plans, the State Implementation Plan (SIP) and RAQS serve as the primary air quality planning documents for the state and SDAB, respectively. The SIP and RAQS rely on the San Diego Association of Governments growth projections based on population, vehicle trends, and land use plans developed by the cities and the County of San Diego (County) as part of the development of their general plans. Therefore, projects that propose development that is consistent with the growth anticipated by local plans would be consistent with the SIP and RAQS and would not be considered to result in cumulatively considerable impacts from operational emissions. As stated previously, the proposed project would not result in significant regional growth that is not accounted for within the RAQS. As a result, the proposed Project would not result in a cumulatively considerable contribution to pollutant emissions.

Projects contributing to adverse traffic impacts may result in the formation of carbon monoxide (CO) hotspots. To verify that the proposed Project would not cause or contribute to a violation of the CO standard, a screening evaluation of the potential for CO hotspots was conducted based on the City's *Significance Determination Thresholds* (City of San Diego 2022a) CO hotspot screening guidance. The City recommends that a quantitative analysis of CO hotspots be performed if a proposed development causes a six-lane or four-lane roadway to deteriorate to a level of service (LOS) E or worse, causes a six-lane roadway to drop to LOS F, or if a proposed development is within 400 feet of a sensitive receptor and the LOS is D or worse. The proposed Project would not exceed the City's screening guidance for CO hotspots.

As a result, the proposed Project would not result in a cumulatively considerable contribution to pollutant emissions. Impacts to air quality would **not be cumulatively considerable** during construction and operation.

5.2.2 BIOLOGICAL RESOURCES

The area considered for cumulative impacts to biological resources consists of the City and immediately surrounding lands and waterways. While the majority of growth is expected to occur through infill and redevelopment, future development could occur on or adjacent to undeveloped

land, which may result in incremental impacts to biological resources, including sensitive species, native habitat, wetlands, and wildlife movement. Future development could occur adjacent to the Multi-Habitat Planning Area and produce adverse edge effects. Implementation of the *City of San Diego General Plan, County General Plan, Regional Comprehensive Plan*, and *San Diego Forward: The Regional Plan* would result in direct and indirect effects that could lead to the cumulative loss of special-status species or hinder wildlife movement. In addition, cumulative impacts in the region could result from impacts to sensitive habitat, including riparian and wetland areas. Cumulative projects in the San Diego region would be required to comply with applicable habitat conservation plans or natural community conservation plans, as well as local policies and ordinances, and cumulative effects related to conflicts with plans and policies would not occur.

Preservation of the region's biological resources has been addressed through implementation of regional habitat conservation plans, including the *City of San Diego MSCP Subarea Plan* and *County of San Diego MSCP Subarea Plan*. The *County of San Diego MSCP* is a long-term regional conservation plan established to protect sensitive species and habitats in the County. The *County of San Diego MSCP* is divided into subarea plans that are implemented separately. The Project area is within the City's MSCP Subarea Plan, and portions are within, intersect, or are adjacent to the MSCP Preserve area (i.e., Multi-Habitat Planning Area). The *County of San Diego MSCP* planning effort is designed to address cumulative impacts through development of a regional plan that addresses impacts to Covered Species and habitats in a manner that ensures their conservation despite impacts of cumulative projects over the long term. The ultimate goal of the MSCP is the establishment of biological reserve areas in conformance with California's Natural Community Conservation Planning Act.

Cumulative impacts to sensitive vegetation communities and wildlife from implementation of the Project are not expected to be significant since all activities proposed are in conformance with the regional and City plans described above. The City's MSCP Subarea Plan and VPHCP list Essential Public Projects as conditionally compatible with the biological objectives of the MSCP and VPHCP and as allowed uses within the City's Multi-Habitat Planning Area. Conditions of compatibility include compliance with applicable sections of the Subarea Plan, including Section 1.4.2 (General Planning Policies and Design Guidelines), Section 1.4.3 (Land Use Adjacency Guidelines), and Section 1.5 (Framework Management Plan), and of the VPHCP, including Section 4.1.5 (Essential Public Projects) and Section 5.2 (Avoidance and Minimization Measures). A matrix documenting Project compliance with the MSCP, including the sections listed above, is provided in Section 4.5, Land Use (see Table 4.5-2) of this PEIR. The Project is a linear infrastructure project and is therefore considered an Essential Public Project under both the MSCP and VPHCP. In addition, no vernal pools or native grassland habitat would be impacted as part of the Project. Impacts to special-status species that are not covered under the MSCP or VPHCP would largely be avoided through implementation of environmental protocols, and, where significant impacts are unavoidable, such impacts will be reduced to a level less than significant through implementation of mitigation measures. When considered cumulatively, impacts to non-covered species are expected to be relatively small and

dispersed both geographically and temporally. Thus, the Project's incremental contribution to biological resource impacts **would not be cumulatively considerable**.

5.2.3 GREENHOUSE GAS EMISSIONS

Due to the global nature of the assessment of GHG emissions and the effects of global climate change, GHG emissions analysis, by its nature, is a cumulative impact analysis. Therefore, the information and analysis provided in Section 4.3, Greenhouse Gas Emissions, to determine Project-level impacts, applies here, and the Project's contribution to global climate change would not be cumulatively considerable.

The City's 2022 Climate Action Plan (CAP) includes CAP Consistency Regulations for general land use project-level analyses. For public infrastructure projects, the City prepared a memo (*Climate Action Plan Consistency for Plan- and Policy-Level Environmental Documents and Public Infrastructure Projects*), which outlines an alternative approach to evaluating project consistency with the CAP that is more appropriate for infrastructure projects (City of San Diego 2022b). Per the City's recommended approach, environmental analysis for public infrastructure projects should include a discussion of overall consistency with each of the CAP's key strategies, specifically identifying project features that would meet the goals of the plan.

As discussed in Section 4.3, the Project would not conflict with the CAP strategies applicable to the Project and would not impede the City's ability to implement the actions identified in the CAP to achieve the CAP's goals and targets and associated GHG emission reductions. The Project would comply with, and support, the goals and policies of the City's CAP. As such, the Project **would not result in a cumulatively considerable contribution** to a cumulative impact.

5.2.4 HISTORICAL, ARCHAEOLOGICAL, AND TRIBAL CULTURAL RESOURCES

The cumulative impact area for cultural resources is the City jurisdictional limits and its immediate vicinity. Future development resulting from plans and projects would involve ground-disturbing activities that would have the potential to result in impacts to historical, archaeological, and/or tribal cultural resources, as well as impacts associated with alteration or demolition of historic structures or landscapes. Impacts on built environment, archaeological, and tribal cultural resources tend to be individual in nature and specific to the context of the resource and the aspects of integrity that contribute to a resource's eligibility for listing in the California Register of Historical Resources or National Register of Historic Places. Nevertheless, cultural resources are ubiquitous, and because their individual significance is unknown until analyzed, potential impacts on cultural resources caused by cumulative projects can collectively contribute to an incremental loss to the aggregate of nonrenewable cultural resources in the environment. In addition, implementation of multiple

projects can result in cumulative impacts on particular resources, such as historic districts or landscapes that have not yet been recorded or discovered.

Cumulative plans, programs, and projects in the San Diego region would have the potential to result in cumulative impacts associated with the loss of historical, archaeological, and/or tribal cultural resources. Development related to these plans, programs, and projects could involve ground disturbance and substantial alteration, relocation, or demolition of historic buildings, structures, objects, landscapes, and sites that could significantly impact historic and archaeological resources, human remains, or tribal cultural resources, including previously undiscovered resources.

As described in Section 4.4, Historical, Archaeological, and Tribal Cultural Resources, known archaeological, built environment, and tribal cultural resources exist within the Project's area of potential effect, and the potential also exists that unknown cultural resources could be discovered. The Project's area of potential effect also includes lands of significance to California Native American tribes culturally affiliated with the area and known tribal cultural resources in proximity to the area of potential effect. With implementation of Mitigation Measure **(MM) CR-1** and **MM-HR-1** through **MM-**-**HR-2**, the Project would still have significant and unavoidable impacts on cultural and historical resources. However, because the Project and other cumulative plans, programs, and projects identified within the cumulative impact study area are mitigated by the collection and curation of information, construction monitoring, and the preservation of the most important resources, adequate mitigation has occurred for in situ appreciation of, and access to, information regarding those sites. This reduces the potential for cumulative effects. Nonetheless, the Project could contribute to a **cumulatively considerable** impact to historical, archaeological, or tribal cultural resources.

5.2.5 LAND USE

The study area for the assessment of cumulative land use impacts would be the Project area. Cumulative land use impacts could occur if the Project results in divisions to communities or conflicts with a land use plan, policy, or regulation. The implementation of the Project would accomplish a defined goal of the City to underground utilities lines in accordance with the Utilities Undergrounding Program Master Plan. The Project would not cause any cumulative changes in land use across the Project area, nor would any effects occur that would cause division of communities. The Project would be consistent with adopted plans and regulations governing land use and development in the City. Any potential cumulatively considerable impacts would be addressed through compliance with established regulatory framework, including plans and programs, as well as zoning standards and design guidelines. The City would review future project applications for compatibility, policy consistency, and applicable noise requirements and would require specific conditions as part of the Project process. Therefore, the Project's incremental contribution to land use impacts **would not be cumulatively considerable**.

5.2.6 NOISE

The area considered for cumulative noise impacts is the City. The City's General Plan Noise Element within Blueprint SD contains noise guidelines (City of San Diego 2024). The maximum exterior noise exposure depends on the receiving land use category. Section 59.5.0401 of the San Diego Municipal Code (SDMC) sets forth exterior sound level limits produced by noise-generating sources on a property as evaluated at or beyond its boundary. Compliance with existing noise requirements in the SDMC and adherence to mitigation measures associated with noise abatement would help ensure that the incremental contribution to noise impacts would not be cumulatively considerable. Given the anticipated growth in the region, new sources of noise and vibration may be generated by increased traffic and construction and operation of new development, resulting in short-term, construction-related noise impacts and long-term increases in ambient noise levels, which could exceed noise standards or generate excessive vibration.

Plans, programs, and projects considered in the cumulative impact analysis for noise and vibration include the General Plan for unincorporated San Diego County, the *San Diego International Airport – Airport Land Use Compatibility Plan*, the *Morena Corridor Specific Plan*, the *Midway-Pacific Highway Community Plan Update*, the North City Project, and the Mid-Coast Corridor Transit Project, among others. Cumulative noise impacts would generally be associated with improvements to regional transportation corridors and stationary sources, such as industrial land uses. The Project could potentially result in cumulative noise impacts when combined with noise generation from presently ongoing and reasonably foreseeable future projects in the Project area, but this cumulative impact potential depends on the proximity of the Project and others to a common receptor. Noise levels decrease as the distance from the noise source to the receiver increases. Therefore, only noise sources of substantially comparable or greater intensity than those associated with Project construction activities in the immediate vicinity of a receptor under which Project construction activities would occur have the potential to combine with the Project's temporary noise emission to cause a cumulative noise impact at a receptor location.

As described in Section 4.6, Noise, construction activities under the Project would generate temporary increases in ambient noise levels associated with the use of heavy equipment and transport of materials to and from construction sites. With implementation of **MM-NOI-1**, potential construction noise impacts related to Project implementation would be reduced to a less-than-significant level. However, there may be circumstances where distances between sources of construction activity noise and the receiver are very close and would result in exposure levels that still exceed the City's threshold. By way of illustration, one of the construction noise prediction worksheets included as part of Appendix F shows that even with implementation of an 8-foot-tall temporary barrier in the direct sound path from source to receptor, there remain minimum distances within which noise exposures would exceed a 75 A-weighted decibel 12-hour equivalent sound level value. For this reason, and under such potential conditions of source-to-receiver

proximity and construction equipment activity as studied herein for the Project, construction noise impacts may be significant and unavoidable.

Vibration levels resulting from some construction equipment would result in excessive groundborne vibration levels when occurring very close (i.e., distances identified in Table 4.6-5) to residential homes, fragile structures (e.g., historic resources), or buildings within which operation of vibration-sensitive instruments and processes occur, such as medical procedures, advanced technology manufacturing (e.g., lithography), and scientific research. Under such conditions, impacts would be significant and unavoidable.

Due to the Project's potentially significant and unavoidable noise and vibration impacts during construction, in combination with nearby projects, noise impacts have the potential to be **cumulatively considerable**.

5.2.7 PALEONTOLOGICAL RESOURCES

Similar to historical, archaeological, and tribal cultural resources, paleontological resources are site-specific resources, although cumulative impacts to paleontological resources could occur due to the continued pressure for development and redevelopment in the region that requires extensive excavation into fossil-bearing formations (Issue 1). Potential cumulative impacts to paleontological resources would result from nearby projects that combine to create an environment where fossils exposed on the surface are vulnerable to destruction by earthmoving equipment, looting by the public, and natural causes, such as weathering and erosion. Most impacts to paleontological resources are site-specific and are therefore generally mitigated on a project-by-project basis. Effects on paleontological resources depend on the paleontological sensitivity of the formation and the depth/extent of excavation required for each cumulative project. As indicated in Section 4.7, Paleontological Resources, of this PEIR, based on the depth of anticipated excavation for the Project (less than approximately 5 feet in depth), known fossil localities in the Project area are not anticipated to be impacted by Project-related earthmoving. If excavation quantities exceed the City's established grading quantity thresholds in paleontologically sensitive locations identified in Confidential Appendix G of this PEIR, implementation of required monitoring pursuant to Land Development Code Section 142.0151 and Land Development Manual Appendix P, would ensure that the potential for impacts to paleontological resources would be less than significant and no mitigation would be required. Given the depth of anticipated excavation for the Project and requirements for paleontological monitoring if the City's grading quantity thresholds are met, site-specific losses of paleontological resources would not be anticipated to combine with other nearby projects to result in the cumulative loss of paleontological resources in the region. Thus, the Project's incremental contribution to paleontological resource impacts **would not be cumulatively considerable**.

5.2.8 TRANSPORTATION

The study area for transportation and traffic includes the roadways within the limits of the City. As discussed in Section 4.8, Transportation, it is expected that worker and truck traffic would be spread throughout different areas of the length of a typical project. Given the maximum yearly construction trip generation of 176 daily trips, 74 AM peak-hour trips and 74 PM peak-hour trips, the trips generated by project construction would not generate enough traffic per the City's criteria to require the preparation of a Local Mobility Analysis. Additionally, due to the low trips generated by the Project, it is presumed to result in a less-than-significant impact to vehicle miles traveled. In some circumstances, there may be partial or complete road closure for a short duration during the construction period that could temporarily impact existing traffic load and capacity of the street and system. However, these short-term closures are consistent with routine utility work and would not be significant. Implementation of a traffic control plan/permit would address project-specific impacts and reduce potential impacts to less-than-significant levels. Activities conducted under the Project would be implemented across the City over an extended period of time and would not remain in any one location for a significant period. Thus, the Project's incremental contribution to transportation/circulation and parking impacts **would not be cumulatively considerable**.

5.2.9 SOLID WASTE

As discussed in Section 4.9, Solid Waste, of this PEIR, the Project area is currently served by two landfills. The Project would generate construction and demolition waste consisting of utility poles, wires, transformers, concrete, asphalt, soil, and small amounts of packaging material. The project would incorporate waste reduction strategies from the City's *Whitebook* standards that would ensure impacts resulting from construction of the Project would be less than significant. Implementation of the proposed Project, in combination with other proposed, approved, and reasonably foreseeable projects, would result in cumulative demand for solid waste service and landfill capacity. Projects implemented under the Project would generate waste; however, quantities would not be substantial, and disposal facilities are available. Further, incorporation of waste reduction strategies from the City's *Whitebook* standards would ensure less-than-significant impacts from construction of the Project. Therefore, the incremental contribution to solid waste impacts **would not be cumulatively considerable**.

6 ENVIRONMENTAL EFFECTS FOUND NOT TO BE SIGNIFICANT

California Environmental Quality Act (CEQA) Guidelines Section 15128 requires that an Environmental Impact Report (EIR) contain a brief statement disclosing the reasons why various possible significant effects of a proposed project were found not to be significant and therefore were not discussed in detail in the EIR. The City of San Diego (City) engaged the public in the scoping of this Program EIR (PEIR). Comments received during scoping have been considered in the process of identifying the scope of impact evaluation. The contents of this PEIR were established pursuant to the CEQA Guidelines (14 CCR 15000 et seq.), on public and agency input received during the scoping process, and independent analysis. As indicated in the Notice of Preparation (NOP) issued on October 15, 2018, for the Utilities Undergrounding Program (Project) and following additional independent analysis, the following topics were determined not to be significant: aesthetics/visual effects and neighborhood character, agriculture and forestry resources, energy, geology/soils, health and safety hazards, hydrology and water quality, mineral resources, population/housing, public services and facilities, and utilities/service systems (excluding solid waste). A brief analysis of each of these topics is provided below.

Topic areas that were identified in the NOP or in public comment on the NOP that were carried forward for detailed analysis are as follows: air quality and odor; biological resources; greenhouse gas emissions; historical, archaeological, and tribal cultural resources; land use; noise; paleontological resources; transportation; and solid waste. These topic areas are discussed in Chapter 4, Environmental Analysis.

6.1 AESTHETICS/VISUAL EFFECTS AND NEIGHBORHOOD CHARACTER

Substantial Alteration to Aesthetics and Neighborhood Character; Incompatible Bulk, Scale, Materials, or Style

An overall public benefit of the Project is the enhanced visual quality of neighborhoods from the removal of overhead utility lines and the associated infrastructure, such as utility poles. As a citywide Project, different neighborhoods have their own unique character. In a more rural community, the transition from overhead to underground can be quite a dramatic aesthetic improvement. In a more urbanized area, the benefits are also pronounced, as noted in the Utilities Undergrounding Program Master Plan (City of San Diego 2018) Figures 1 and 2 depicting Mission Boulevard before and after undergrounding efforts. While there may be short-term limited visual construction impacts related to staging and storage of construction equipment, the City's standard best management practices would address proper storage and clean-up upon completion. Furthermore, the Project would enhance the overall community character by removing unsightly overhead lines that block scenic views, mature trees, storefronts, historical buildings, and other improvements from the public.

Although the Project would enhance the overall community character by removing unsightly overhead lines, it would also require the placement of aboveground electric transformer boxes and telecommunication pedestals. The size and number of boxes and pedestals depend on several factors, including electric load, distance between customers, and conflicts with existing facilities. Streets with commercial and multifamily properties require larger and/or more boxes than a street with single-family homes. In single-family neighborhoods, electric transformers are most commonly green boxes measuring 3 feet by 3 feet by 3 feet and placed on concrete pads measuring 4 feet by 4 feet and several inches tall. Pedestal sizes are more variable between the different telecommunication companies but are often smaller than transformer boxes. The number of transformer boxes typically varies between 1 per 8 homes to 1 per 15 homes. Some properties may receive one, two, or three boxes depending on conditions.

Boxes, pedestals, streetlights, and any other appurtenant equipment (if necessary) would be placed in the public right-of-way (ROW) or in a utility easement. The location of existing overhead lines (e.g., alleys or back lots) does not necessarily dictate where new underground and aboveground facilities will be located. In some instances, new aboveground utility infrastructure, such as transformer boxes, pedestals, and fuse cabinets, would be placed along the public ROW where there is currently no existing aboveground utility infrastructure. These include situations where utility poles may exist within the alley, as opposed to the roadway. In these instances, new aboveground utility infrastructure may not be feasibly placed in the alley due to space constraints or other factors and instead require placement within the frontage ROW.

Structures receiving the undergrounded utility service would require conduit to be placed on the outside of the building running from the ground to the electric service panel. Some buildings may need additional conduit and/or a junction box installed depending on various factors including distance to the service panel and configuration of the existing electric service feed, among other site-specific factors. The conduit is generally no larger than a few inches in diameter. The placement of exterior equipment on designated historic structures would be reviewed by historic resources staff when electric service conversion permits are issued. Streetlights installed in historic districts would conform to the applicable City standards for the neighborhood.

Aware of such potential community concerns to changes in the visual environment, the City Council established the Utility Undergrounding Advisory Committee to advise on how the City may better implement the Project to minimize community concerns related to the installation of utility equipment, including aboveground utility boxes, while undertaking undergrounding projects. In March 2015, the committee released their report and recommendations (City of San Diego 2015). The recommendations include design options and siting requirements for new aboveground equipment, included as Attachment C to the report. Design options for new aboveground equipment include location factors influenced by reliability/safety, technological requirements, and aesthetics, with input from surrounding property owners, the local planning group, and the City. Site

selection and design generally will be informed by the following characteristics, among others: allows for screening of equipment, minimizes the need for additional support structures such as retaining walls and bollards, maintains a clear path of travel for pedestrians, avoids enhanced parkways, and is located away from the adjacent property's primary entrance or focal point. A pre-design community forum will be held to present proposed locations for equipment and allow property owners and residents to communicate their concerns and preferences to the design teams to help guide decisions about utility box and streetlight locations. In addition, information is provided about new street planting that will be done at the end of the Project.

The addition of the aboveground transformer boxes and pedestals and building attachments would not substantially change the character of the developed areas where they would be installed, and the overall visual impact on the neighborhood would be improved by removing the overhead lines and poles. Further, with ongoing pre-design and pre-construction community forums with the community of each underground project, along with the design option recommendations of the report, the Project would minimize disruption of the visual environment that may result from installation of new aboveground equipment. As such, Project impacts on aesthetics/visual effects and neighborhood character would be **less than significant**.

Obstruction of Scenic Views/Vistas

The City's General Plan protects desirable views from public roadways and parklands to natural canyons, resource areas, and scenic vistas. The City contains numerous publicly accessible scenic vistas and designated scenic views identified in its General Plan, Community Plans, or other applicable plans. The Project would result in the removal of existing tall utility poles and overhead lines. Overall, the removal of poles and overhead lines would improve views afforded at any given public vantage point. The Project would also require the placement of aboveground electric transformer boxes and telecommunication pedestals, of relative smaller size when compared to the existing overhead lines and poles, which would not substantially block public views. The previously discussed established process regarding the site location and design of any new aboveground infrastructure would further minimize the potential for obstruction of views. Therefore, impacts related to scenic views/vistas would be **less than significant**.

Substantial Landform Alteration

The Project involves minimal grading and would not result in substantial landform alteration. The Project would not exceed steep hillside encroachment allowances; would not create manufactured slopes higher than 10 feet or steeper than 2:1; would not change elevation of steep hillsides by more than 5 feet; and would not include mass terracing of natural slopes. Therefore, impacts would be **less than significant.**

Light and Glare

The Project would primarily involve construction activities during daylight hours; exceptions would occur during emergency situations or on high-traffic roads where lane closure is not feasible in accordance with traffic control and noise permit requirements for nighttime work. Lights may be necessary during emergency situations, although their use would be temporary and limited to the work area. The Project would not involve the construction of glare-inducing objects. Streetlights that were on utility poles to be removed as part of the Project would be replaced with new stand-alone streetlight fixtures in accordance with current City streetlight standards. There would be no increase in lighting compared to existing conditions. Therefore, impacts would be **less than significant**.

6.2 AGRICULTURE AND FORESTRY RESOURCES

Conversions or Conflicts with Agricultural Land

The City includes agricultural-use lands, primarily focused on the San Pasqual Valley, Otay Mesa, and the Tijuana River Valley. Per the City's *Significance Determination Thresholds* (City of San Diego 2022), significant agricultural resources consist of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as defined by the State of California Department of Conservation Farmland Mapping and Monitoring Program. The Farmland Mapping and Monitoring Program determination of agricultural resources is based on a series of factors, such as soil condition, water availability, and history of agricultural use. The City and immediately adjacent areas include land mapped as Prime Farmland, Unique Farmland, and Farmland of Statewide Importance (Department of Conservation 2016). While the City also considers Williamson Act Contract lands as significant agricultural resources, no such lands are located within the City.

Undergrounding of overhead utilities would occur within previously disturbed or developed sites, including roadway ROWs and urban areas with existing overhead utilities. Portions of these areas are potentially mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. While these areas may be mapped as agricultural resources, these areas are already considered removed from agricultural use due to the presence of ROWs and easements that allow for ongoing use for utilities. In addition, the proposed change from overhead to underground utilities would not preclude or impede the operation of adjacent agricultural uses. Thus, the Project would not result in any indirect conversion of agricultural uses. Overall, impacts to agricultural resources resulting from the Project would be **less than significant**.

Conversion or Conflict with Forest Land

The City and immediately adjacent areas do not include forest land or land designated or zoned for forest land or timberland uses. Therefore, **no impact** to forestry resources resulting from the Project would occur.

6.3 ENERGY

Wasteful, Inefficient, or Unnecessary Consumption of Energy

The proposed activities associated with undergrounding utilities would not be energy intensive and would be temporary in nature. Fuel consumed by construction equipment and vehicle miles traveled associated with the transportation of materials and construction worker commutes would be the primary energy resource expended over the course of construction. Heavy-duty construction equipment and haul trucks are assumed to use diesel fuel. Construction activities would be required to comply with California Air Resources Board's Airborne Toxics Control Measure, which restricts heavy-duty diesel vehicle idling time to 5 minutes, which would minimize fuel consumption. Electric-powered, light-duty construction equipment would also be used. Workers traveling to and from project sites throughout the duration of construction activities are assumed to use gasoline-powered vehicles. The operational phase would involve maintenance activities that would generate minimal energy usage, similar to or less than current maintenance activities. The Project does not propose any structures or uses that would typically be energy intensive. Thus, because electricity, natural gas, and petroleum use during Project activities would be temporary and relatively minimal, and would not be wasteful or inefficient, the energy impact from the Project would be **less than significant**.

Conflict with Plans for Renewable Energy or Energy Efficiency

The Project would not involve construction of new buildings and would be limited to undergrounding of utility infrastructure that is already in place throughout the City. The Project would not conflict with or otherwise obstruct a state or local plan for renewable energy or energy efficiency, including the City of San Diego *Climate Action Plan*, and impacts would be **less than significant**.

6.4 GEOLOGY/SOILS

Geologic-, Soil-, and Seismic-Related Hazards

With regard to potential geology and soil impacts, the City's *CEQA Significance Determination Thresholds* (City of San Diego 2022) focus on whether a project would expose people or structures to potential substantial adverse effects involving rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, or landslides, or result in substantial soil erosion or topsoil loss. The City's *CEQA Significance Determination Thresholds* also specify that a significant impact to geology and soils would occur if a project site were located on an expansive or unstable geologic unit or soil or includes soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for wastewater disposal.

The Project would not involve the construction of buildings, housing, or other habitable structures and would, therefore, not expose people or structures to geology or soils impacts. The only issue that could arise would be related to erosion and sedimentation. As described in Chapter 3, Project Description, the Project would involve ground-disturbing activities such as trenching, tunneling, digging, pole removal, tree planting, street repair, and curb ramp improvements. Required compliance with the City's latest standard grading and stormwater quality control measures during Project implementation would ensure avoidance of soil erosion, slope instability and adverse settlement. Thus, the Project would not cause substantial impacts related to geology and soils, and this impact would be **less than significant**.

6.5 HEALTH AND SAFETY/HAZARDS

Release of Hazard Materials

The proposed construction activities would involve periodic and routine transport, use, storage, and disposal of minor amounts of hazardous materials. In addition, the City includes numerous hazardous materials sites compiled pursuant to Government Code Section 65962.5. The Project undergrounding areas are also located within 0.25 miles of schools. The Project would be required to comply with all applicable hazardous material rules and regulations, including the California Code of Regulations Title 23 Health and Safety Regulations, as managed by the San Diego County Department of Environmental Health. This includes adherence to all applicable laws and regulations related to soil and groundwater contamination should it be encountered during construction or operation. The City created the *Whitebook* (City of San Diego 2021), a supplement that takes precedence over the specification language contained in *The Greenbook: Standard Specifications for Public Works Construction* (Public Works Standards Inc. 2024) and addresses the unique conditions in the City that are not addressed in the *Greenbook*. Part 1 – General Provisions (A), Section 7-22 addresses the potential release of a hazardous substance or petroleum product and also addresses the requirements for when a hazardous substance or petroleum product is encountered; such provisions apply to all contracts, including the undergrounding projects under the Project. Additionally, a required database search will be conducted during the permitting process of each undergrounding project under the Project to identify any existing and known hazardous materials and sites within the construction area and vicinity. Required compliance with the provisions of the *Whitebook* would minimize potential adverse effects from encountering hazardous material contamination and release during construction. Therefore, the Project would not create a significant impact to the public or the environment as a result of hazardous materials sites, and impacts would **be less than significant**.

Airport-Related Hazards

The following airports are located within the City's jurisdictional boundaries: San Diego International Airport, Marine Corps Air Station Miramar, Brown Field Municipal Airport, and Montgomery-Gibbs Executive Airport. In addition, Tijuana International Airport, Gillespie Field, Naval Air Station North Island, and Naval Outlying Field Imperial Beach are located adjacent to the City. The Project would have no effect related to airport safety, as the Project would consist of undergrounding utilities and would not significantly alter the number of people within the airport influence areas of these airports. The Project may include proposed tree replacement or installation of streetlights, but such structures would not exceed the existing pole heights or otherwise be expected to result in a hazard to air safety. Nonetheless, the Project would be required to comply with the Federal Aviation Administration's Part 77 Notification criteria. Thus, the Project would not result in an airport-related safety hazard. Impacts would be **less than significant**.

Wildfire Hazards

The Project area is partially within the state-designated Very High Fire Hazard Severity Zone. However, the Project would not involve placing any additional residences or other structures within a wildland fire interface. Overhead Utilities in open space areas could potentially impact flammable materials such as brush, grass, or trees, which could pose a slight risk of wildfires in the event sparks ignite these materials. Therefore, the proposed undergrounding of overhead utilities has potential to reduce fire risk. Impacts related to wildfire would be **less than significant**.

Impair or Interfere with an Emergency Response or Evacuation Plan

Construction of undergrounding projects would encroach into streets or ROWs under the jurisdiction of the San Diego Metropolitan Transit System, North County Transit District, California Department of Transportation, and/or City, and could require temporary partial or full lane closures and diversion of traffic around these work areas. Temporary lane closures or traffic diversions have the potential to partially impede public access or interfere with a roadway designated for emergency access. However, each of these agencies has requirements to obtain encroachment and/or traffic control permits prior to commencing work within their respective ROWs, which typically involve submittal of traffic control plans and related traffic control documentation.

Although construction activities are not anticipated to result in road closures, some roads may be limited to one-way traffic under circumstances where construction activities and equipment staging cannot accommodate two-way traffic flow. A traffic control permit is required for each undergrounding project to ensure adequate and safe access is maintained during construction. The City and contractor would coordinate provisions for emergency vehicle and local access, as necessary. Traffic control measures would be implemented, monitored, and controlled by construction personnel in accordance with the traffic control permit. Steel plating would be placed

over open trenches at the end of the workday to maintain vehicular and pedestrian circulation across areas that are not under active construction.

Prior to commencing work on the facilities that would encroach into ROWs, the City would ensure that all traffic control requirements are met and required permits are obtained. Thus, obtaining a traffic control permit and applicable encroachment permits would ensure that safe, clearly marked, alternate routes around construction activities are provided to prevent interference with an emergency response or evacuation plan. Therefore, impacts would be **less than significant**.

6.6 HYDROLOGY AND WATER QUALITY

Degradation of Water Quality

Potential impacts to existing water quality standards associated with the Project would include minimal short-term construction-related erosion/sedimentation and no long-term operational stormwater discharge. A stormwater pollution prevention plan or water pollution control plan would be prepared for each undergrounding project within the Project. Construction and operation of all projects within the Project would be required to comply with the applicable stormwater pollution prevention plan or water pollution control plan, which would reduce the potential for water quality impacts related to erosion and sedimentation and other construction-related pollutants. Required conformance with best management practices outlined in the water pollution control plan and compliance with the City's Stormwater Standards would prevent or effectively minimize short-term water quality impacts. Therefore, impacts related to potential degradation of water quality would be **less than significant.**

Increase in Impervious Surfaces and Changes in Drainage Patterns and Runoff

Upon completion of the installation of underground utility lines, the streets, sidewalks, and other impacted areas would be returned to their preexisting conditions, as will the areas where poles are removed. As such, projects implemented under the Project would not affect existing drainage patterns or introduce new impervious surfaces as the Project sites would be returned to pre-existing conditions. Areas within the Project boundaries may be located in flood hazard areas. However, except for small transformer boxes and pedestals, new facilities would be located underground and would not impede or redirect flood flows in the 100-year flood hazard area. Therefore, hydrology impacts would be **less than significant**.

6.7 MINERAL RESOURCES

Loss in Availability of Significant Mineral Resources

The majority of the Project undergrounding areas would be located on previously disturbed or developed sites, including roadway ROWs and urban areas. The majority of these areas are designated as Mineral Resource Zone (MRZ) 1, MRZ 2, MRZ 3 (General Plan Conservation Element Figure CE-6, City of San Diego 2024). MRZ 1 is defined as areas where information indicated that no significant mineral deposits are present or there is little likelihood for their presence; MRZ 2 is defined as areas where information indicates that significant mineral deposits are present or there is a high likelihood of their presence; and MRZ 3 is defined as areas containing mineral deposits, the significance of which cannot be evaluated from available information (City of San Diego 2024). Given that the locations of utility undergrounding would generally be within previously developed areas surrounded by existing uses, the potential for mineral resource extraction in these areas would be low, especially within the developed ROW and within existing easements. Therefore, mineral resource impacts would be **less than significant**.

6.8 POPULATION/HOUSING

Displacement of People or Housing

The Project would not result in the displacement of people or housing, as the construction of Project components does not necessitate the removal of existing residential land uses, housing, or other occupied dwelling units. Therefore, impacts would be **less than significant**.

Directly or Indirectly Induce Substantial Growth

The Project does not include the construction of new housing or proposed changes in land use that would increase density/intensity beyond what is currently planned. The Project would not induce population growth given that the undergrounding of utilities lines is simply replacing an existing overhead facility with the same facility underground. The Project would not result in the extension of utility infrastructure into a currently unserved area such that it could induce growth. Operation and maintenance activities necessary for overhead utilities are already occurring and would continue to be implemented by existing City staff and/or local contractors. Therefore, impacts related to substantial growth would be **less than significant.**

6.9 PUBLIC SERVICES AND FACILITIES

With regard to potential public services impacts, the City's *CEQA Significance Determination Thresholds* and CEQA Guidelines Appendix G focus on whether a project would result in substantial adverse physical impacts associated with the provision of, or need for, new or physically altered

governmental facilities, including fire protection, police protection, schools, parks, and other public facilities, in order to meet acceptable performance objectives.

Fire, Police, Schools, Other Public Facilities

The Project involves converting existing overhead utility lines within an existing utility corridor to an underground position within existing ROWs and easements. No new or altered governmental facilities would be constructed or needed to serve the Project. The Project would not induce growth or increase the demand for public facilities. Therefore, there would be no impacts associated with the construction of new or altered government facilities creating an impact on any public service, including fire protection, police protection, schools, parks, or other public facilities. Therefore, **no impact** would occur.

Parks and Recreation

The proposed undergrounding and ongoing operations of undergrounded utilities would not result in an increase of population that would cause an increase in the use of recreational facilities. The Project would involve undergrounding in or adjacent to existing recreational facilities, which would temporarily involve trenching activities along 100-foot segments per day during construction and occasional maintenance activities during operations (such as routine preventative maintenance inspections). It is possible that the use of other nearby parks or recreational areas may increase during construction-related activities. However, the number of people who chose to utilize another recreational facility would be minimal and temporary and would not cause physical deterioration of the recreational facility. Thus, the Project is not anticipated to impact recreational facilities in a manner that would require construction of replacement recreational facilities elsewhere. Project impacts to recreational facilities would be **less than significant**.

6.10 UTILITIES/SERVICE SYSTEMS (EXCLUDING SOLID WASTE)

Potential solid waste impacts associated with the Project are discussed in Section 4.9, Solid Waste. With regard to potential public utility impacts (i.e., water, wastewater, and expansion of stormwater drainage facilities), the City's *CEQA Significance Determination Thresholds* and CEQA Guidelines Appendix G focus on whether a project would exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board (RWQCB), require or result in the construction or expansion of water or wastewater treatment facilities, or require or result in the construction or expansion of stormwater drainage facilities. The City's *CEQA Significance Determination Thresholds* and CEQA Guidelines Appendix G also specify that a significant environmental impact would occur if sufficient water supplies were not available to serve a project or if adequate wastewater treatment capacity to serve a project is lacking.

Exceed Wastewater Treatment Requirements or Require Construction or Expansion of Water or Wastewater Treatment Facilities, Stormwater Drainage Facilities, or Electrical Power, Natural Gas, or Telecommunications Facilities

The Project would not result in the demand for additional wastewater treatment capacity, nor would it exceed the wastewater treatment requirements of the San Diego RWQCB, since no new development or construction of facilities are proposed that could potentially generate wastewater. In addition, the Project would not result in the construction or expansion of water or wastewater treatment facilities because no new demand for these services would be generated. As such, the Project is not considered to be a growth-inducing project for which additional water infrastructure demand or sewer capacity would be required. Construction and operation of the Project would not alter the wastewater, stormwater drainage facilities, water, or water supply needs within the City. Construction activities would involve temporary portable sanitary systems for construction personnel that would be managed by a licensed sanitation contractor in accordance with RWQCB standards.

Any dewatering required during construction trenching for utility undergrounding activities would also be required to comply with the RWQCB and local requirements and is not anticipated to generate significant wastewater or stormwater necessitating permanent facility improvements. Long-term surface conditions would be the same as the existing conditions. Therefore, the Project would not result in the construction or expansion of stormwater drainage facilities.

The Project would not involve the construction or expansion of natural gas facilities. The Project itself involves the construction of electrical and telecommunication facilities but would not result in or require the construction or expansion of additional facilities; the Project is simply the relocation of existing overhead electrical and telecommunication facilities underground. Therefore, the Project would not necessitate expansion of existing public utilities or require construction of new public utilities, and impacts would be **less than significant**.

Sufficient Water Supplies Available to Serve the Project and Reasonably Foreseeable Future Development During Normal, Dry, and Multiple Dry Years

While water would be necessary for construction activities such as dust control or concrete mixing, water usage for such activities would be minimal and temporary and would be obtained via existing entitlements. Water may also be needed for revegetation (erosion control) and restoration/mitigation. The Project would not result in the additional long-term demand on water supplies. Therefore, impacts would be **less than significant**.

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7 ALTERNATIVES

7.1 INTRODUCTION

The California Environmental Quality Act (CEQA) Guidelines Section 15126.6 requires an Environmental Impact Report (EIR) include a discussion of a reasonable range of project alternatives that could reduce or avoid significant project impacts while meeting most of the project objectives. Thus, this chapter discusses factors in the selection of alternatives, alternatives considered but rejected, alternatives under consideration, the comparison of the alternatives' environmental effects to the Utilities Undergrounding Program (Project), and the determination of the environmentally superior alternative.

7.2 FACTORS IN THE SELECTION OF ALTERNATIVES

An EIR should include a brief description of the rationale for selecting the alternatives to be discussed (14 CCR 15126.6[c]). The following factors were considered in developing the range of alternatives for the Project.

7.2.1 PROJECT OBJECTIVES

Alternatives to be considered must meet "most of the basic objectives of the project" per CEQA Guidelines Section 15126.6(c). The following outline the primary objectives of the Project:

1. Convert overhead utilities to underground when City of San Diego (City) Council determines it is in the interest of public health, safety, and welfare of the general public
2. Align with Council Policy 600-08 for the Project
3. Improve individual project and region-wide planning efficiency and accuracy
4. Prioritize undergrounding projects with the greatest public benefit
5. Reduce impacts to neighborhoods and communities within the City
6. Simplify public interface with the Project

7.2.2 SIGNIFICANT IMPACTS

A primary factor in the selection of alternatives is the ability to avoid or substantially reduce one or more significant impacts that would result from a project. Below is a summary of the potentially significant impacts of the Project analyzed within Chapter 4, Environmental Analysis.

- **Biological Resources.** Direct impacts to sensitive vegetation communities (Tiers I–III and Wetlands), sensitive species, nesting birds (including raptors), and jurisdictional habitat, as well as indirect impacts to biological resources would be potentially significant.

Mitigation Measure (MM) BIO-1 through **MM-BIO-7** would reduce these impacts to below a level of significance.

- **Historical, Archaeological, and Tribal Cultural Resources**. Phase I, Trenching/Boring and Conduit Installation, and Phases V and VI, Post-Undergrounding Improvements and Street Restoration, have the potential to impact historical resources. If an activity does have the potential to impact a historical resource within a specific project footprint, impacts would be potentially significant, and some level of historical resource review and management is required through compliance with the San Diego Municipal Code and implementation of mitigation (**MM-HR-1** and **MM-HR-2**); however, it is not possible to ensure the protection of resources at a program level of review. Therefore, the impact to historical resources remains **significant and unavoidable**.

  The cultural resources inventory/evaluation report summarizes the cultural sensitivity analysis of all anticipated undergrounding projects in relation to the proposed Project activities. The undergrounding project boundaries, as they are currently known, were analyzed for their potential to impact cultural resources and assigned to sensitivity categories. Should the boundaries of the undergrounding projects be modified in the future, it is possible that their potential to impact cultural resources will change. If future planning should require the modification of their boundaries, the modified project boundaries must be reviewed by a qualified archaeologist. The archaeologist shall determine if the modified boundaries are within the 2019 records search boundaries, analyze the modified undergrounding project's potential to impact cultural resources, and assign it to the appropriate category to ensure that the appropriate mitigation is performed. Likewise, any new undergrounding projects must be reviewed by a qualified archaeologist, assessed for whether the existing records search is sufficient or a new records search is required, and assigned to a sensitivity category based on its potential to impact cultural resources. These reviews are likely to be completed by City staff but may also be assigned on a project-specific basis to consulting archaeologists.

  Therefore, impacts to cultural and historical resources as a result of implementation of Project activities, including undergrounding projects, would be potentially significant even with implementation of **MM-HR-1**, **MM-HR-2**, and **MM-CR-1**. Impacts would not be reduced below a level of significance, and impacts to cultural and historic resources would be **significant and unavoidable**.

- **Noise.** Construction noise impacts for activities implemented under the Project near sensitive receptors at horizontal distances closer than those identified in Table 4.6-4 (see Section 4.6, Noise, of this Program EIR [PEIR]) would be potentially significant. With implementation of **MM-NOI-1**, the potential for significant impacts resulting from construction noise occurring in proximity to sensitive receptors would be reduced to a less-than-significant level. However, there may be circumstances where distances between sources of construction activity noise and the

receiver are very close and would result in exposure levels that still exceed the City's threshold. For example, one of the construction noise prediction worksheets included as part of Appendix F shows that even with implementation of an 8-foot-tall temporary barrier in the direct sound path from source to receptor, there remain minimum distances within which noise exposures would exceed a 75 A-weighted decibel 12-hour equivalent sound level value. For this reason, and under such potential conditions of source-to-receiver proximity and construction equipment activity as studied herein for the Project, construction noise impacts may be **significant and unavoidable**.

Groundborne vibration resulting from operation of some construction equipment types would result in excessive vibration exposure levels when occurring very close (i.e., distances identified in Table 4.6-5) to residential homes, fragile structures (e.g., historic resources), or buildings within which operation of vibration-sensitive instruments and processes occur. Therefore, the impact would remain **significant and unavoidable**.

As detailed above, the Project could result in potentially significant impacts related to biological resources; cultural, historical, and tribal cultural resources; and construction noise. In addition, use of some construction equipment has the potential to result in significant and unavoidable impacts related to excessive groundborne vibration levels when occurring very close (i.e., distances identified in Table 4.6-5) to residential homes, fragile structures (e.g., historic resources), or buildings after implementation of mitigation. Thus, the analysis below will focus on these environmental issues and the ability of alternatives to avoid or lessen these impacts. As impacts to the remaining environmental topics would be less than significant and the intent of this alternatives analysis is to avoid significant impacts, these remaining topics are not addressed further herein.

7.2.3 FEASIBILITY

The feasibility of an alternative may be determined based on a variety of factors, including site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and site accessibility and control (14 CCR 15126.6[f][1]). For this Project, the need to have a continuous linear utility connection and continue to provide utility services is a major feasibility factor. In addition, other agencies are involved and have jurisdiction over resources located in the Project area. Thus, other agencies and entities must be considered pertaining to if an alternative could be implemented, as they have control over Project approvals. This includes San Diego Gas & Electric Company and the California Public Utilities Commission, as well as wildlife agencies. Social and legal feasibility also applies due to the location of the existing utilities within rights-of-way (ROWs) on private property. While an alternative should not be dismissed because it may cost more, an alternative may also be eliminated if it is infeasible due to costs.

7.2.4 REQUIRED ALTERNATIVES

An EIR must include a discussion of the No Project: No Action Alternative. The No Project: No Action Alternative describes what would reasonably be expected to occur if the project were not approved. An EIR must also identify the Environmentally Superior Alternative. If the No Project: No Action Alternative is also the Environmentally Superior Alternative, another "build" alternative must be identified as environmentally superior (14 CCR 15126.6[e]).

7.3 ALTERNATIVES ELIMINATED FROM DETAILED CONSIDERATION

The following is a discussion of the alternatives considered during the scoping and planning process and the reasons why they were not selected for detailed analysis in this PEIR. Per CEQA, reasons to eliminate alternatives from further discussion include inability to reduce or avoid a significant project impact, inability to meet most of the project objectives, or infeasibility.

No Project: Business as Usual

The No Project: Business as Usual Alternative would entail continuing to implement undergrounding based on the current City process. The *Utilities Undergrounding Program Master Plan* identifies the specific lines to be undergrounded and delineates Project boundaries, with a goal of undergrounding 15 miles of lines a year. Prioritization of lines to be undergrounded would remain the same. CEQA review is completed as projects are prioritized and ready for the City Council to create the district. As each project utilizes the same undergrounding methods and must comply with the same regulations as the Project, it is anticipated the actual physical improvements to be completed would be the same as the Project.

The No Project: Business as Usual Alternative would meet the majority of Project objectives, as it would meet four of the six Project objectives. More specifically, this alternative would underground utilities (Objective 1), align with Council Policy 600-08 (Objective 2), prioritize undergrounding that provides the greatest public benefit (Objective 4), and reduce impacts to neighborhoods and communities (Objective 5). This alternative would not meet Objectives 3 or 6, as it would not improve Project and region-wide planning efficiency and accuracy or simplify public interface with the Project.

While this alternative was considered and would meet most of the Project objectives, it was rejected because it would not provide the planning efficiencies proposed by the Project and would not contribute to a meaningful discussion per CEQA. This alternative would result in the same impacts as the Project, as it is reasonable to expect that the impact areas and physical implementation of undergrounding would be identical to the Project. While this alternative could be feasible to implement as a "No Project" alternative, it was not selected as the "No Project" alternative for

additional analysis considering it would not provide a meaningful discussion relevant to CEQA considering physical impacts would be identical to the Project.

Alternate Locations

An Alternate Locations Alternative would involve the same linear footage of undergrounding as the Project but would move overhead lines to an alternate linear path either to avoid significant resources or to avoid noise impacts to sensitive land uses. This alternative would implement undergrounding projects based on the City's prioritization criteria. As this alternative would likely require the movement of the lines to alternate locations to avoid resources, it would likely require the City to obtain additional ROW for implementation.

The Alternate Locations Alternative would meet Project Objectives 1, 3, 4, and 5, but not Objectives 2 or 6. This alternative would meet Objectives 1, 3, and 4, as it would continue to underground utilities in the best interest of the public using a master-planned approach similar to the Project. This alternative would continue to implement measures to reduce impacts to neighborhoods and communities as well, which would meet Objective 5. However, this alternative would not align with either Council Policy 600-08, as it would require additional ROW to reroute utilities or SDMC section 61.0508(b) that requires undergrounded lines to "follow the existing aerial route to the greatest extent possible" with only minimum variation. Per Council Policy 600-08, "lines or facilities must be within the public right of way, City owned property, or other property within the jurisdiction of the City Council." Thus, this alternative would not satisfy Project Objective 2. Considering lines may be rerouted outside of City-controlled areas and require additional ROW, the Alternate Locations Alternative would also not meet Objective 6 since it would likely result in a more complicated public process. Overall, the Alternate Locations Alternative would meet the majority of Project objectives.

While this alternative would have potential to reduce significant impacts of the Project and meet the majority of Project objectives, it is not considered a feasible Project alternative. For a project of this nature, it is not feasible to relocate the overhead utilities to another location due to the need to provide service to the specific areas where the lines are located. In addition, the need to obtain additional ROW for such an alternate path would be potentially infeasible for social concerns. As mentioned above, this alternative would conflict with the Council Policy 600-08 requirement that undergrounding occur within the jurisdiction of City Council as well as SDMC section 61.0508(b) that requires undergrounding to follow the existing aerial route to the extent possible. For these reasons, the Alternate Locations Alternative was considered but rejected.

7.4 ALTERNATIVES UNDER CONSIDERATION

No Project: No Action

The No Project: No Action Alternative would involve the City discontinuing the Project. While the Project would be discontinued, it is expected that undergrounding would continue to occur privately when property owners implement frontage improvements or new development, or publicly when the City implements roadway improvements. Undergrounding and maintenance activities would include the same methods as described for the Project in Section 3.5, Proposed Utilities Undergrounding Program, and Section 3.6, Operations and Maintenance, of this PEIR.

This alternative would not meet most of the basic Project objectives, as it would not result in the active undergrounding of utilities (Objective 1), align with Council Policy 600-08 (Objective 2), improve undergrounding planning (Objective 3), or prioritize undergrounding with public benefit (Objective 4). It would reduce impacts to the neighborhoods and communities (Objective 5) and simplify public interface (Objective 6), as undergrounding activities would be reduced and the Project's public interfacing would be eliminated. While this alternative would not meet the majority of Project objectives, it is nonetheless analyzed further due to the CEQA requirement to address a no project alternative (see Section 7.2.4, Required Alternatives).

Reduced Cultural and Biological Resources Impact Alternative

The intent of the Reduced Cultural and Biological Resources Impact Alternative would be to avoid or reduce significant direct and indirect impacts to cultural and biological resources known to be present. Within the potential undergrounding areas within the City, these resources are primarily in undeveloped areas where native vegetation and soils have not been previously disturbed. While the Project would generally avoid direct impacts to cultural and biological resources by not trenching and tunneling in undisturbed/open areas, this alternative would limit all Project activities in areas with known sensitive resources to avoid potential indirect impacts. Additionally, undergrounding activities in areas within required active nest buffers of a Multi-Habitat Planning Area (MHPA) would be limited to outside the breeding season. Generally speaking, this alternative would be limited to undergrounding projects in previously developed and disturbed areas of the City that are also not located adjacent to known cultural resources, areas deemed moderately high and highly sensitive to cultural resources, or sensitive biological resources. Undergrounding projects would include prioritization criteria first based on the avoidance of resources and subsequently based on the City's prioritization criteria. Undergrounding and maintenance activities would include the same methods as described for the Project in Sections 3.5 and 3.6 of this PEIR. However, despite reducing the scale of undergrounding, implementation of this alternative would likely be prolonged due to avoidance of construction during the breeding season.

The Reduced Cultural and Biological Resources Impact Alternative would meet the majority of Project objectives, as it would meet four of the six Project objectives. More specifically, this alternative would include undergrounding utilities that would benefit the public pursuant to Project Objective 1. While this alternative would align with the majority of Council Policy 600-08 requirements and criteria, it would prioritize the reduction or avoidance of cultural and biological resources impacts over the City's prioritization criteria and over public benefit. Thus, this alternative would not meet Objectives 2 or 4. This alternative would be consistent with Objectives 3, 5, and 6, as it would include master planning of utility improvements, continue to reduce impacts to neighborhoods and communities, and simplify public interface via master planning. Overall, the Reduced Cultural and Biological Resources Impact Alternative meets the majority of the Project objectives.

7.5 COMPARISON OF ENVIRONMENTAL EFFECTS

This environmental effects analysis is intended to provide enough information to allow meaningful evaluation, analysis, and comparison with the Project. An EIR need not evaluate the environmental effects of alternatives in the same level of detail as the proposed project. The alternatives discussion is intended to focus on alternatives to a project or its location that are capable of avoiding or substantially lessening any significant effects of that project, even if these alternatives would impede, to some degree, the attainment of that project's objectives. Thus, the analysis below is focused on the potentially significant impacts of the Project. The discussion below will include other issue areas if the alternative would result in an additional impact relative to the Project.

No Project: No Action Alternative

Biological Resources

Under the Project, there are some instances where the potential exists to significantly impact sensitive biological resources, including sensitive plant and wildlife species. There are also some places where the utility is located within or adjacent to the MHPA boundary (within 200 linear feet, as referenced in the PEIR, which is more conservative than other previous documents such as the Citywide Pipeline MND PTS# 255100 that considered 100 linear feet for adjacency). Under the No Project: No Action Alternative, all undergrounding improvements would continue to occur privately when property owners implement frontage improvements or new development, or publicly when the City implements roadway improvements. While biological impacts would be reduced relative to the Project because fewer undergrounding would occur, a potential would remain for significant biological resources to be located within the ROWs adjacent to roadways. Thus, because the No Project: No Action Alternative could impact resources located adjacent to roadways, it would still result in significant impacts to sensitive vegetation communities (Tiers I–III and Wetlands), sensitive species, nesting birds (including raptors), and jurisdictional habitat, as well as indirect impacts to

biological resources absent mitigation. However, under the No Project: No Action Alternative, impacts would be reduced when compared to the Project.

Historical, Archaeological, and Tribal Cultural Resources

As detailed in PEIR Section 4.4, Historical, Archaeological, and Tribal Cultural Resources, the City includes many known historical and archaeological resources. In addition, the City has many areas where there is a high potential for unknown subsurface archaeological resources. The proposed undergrounding and associated ground disturbance activities would have potential to disturb these known and unknown historical resources, which would be a significant impact to historical resources absent mitigation. As the impact area would be greatly reduced relative to the Project, the archaeological, historical, and tribal cultural resource impact of the No Project: No Action Alternative would be reduced when compared to the Project.

Noise

Under the No Project: No Action Alternative, undergrounding activities would be reduced to areas undergoing frontage and roadway improvements. As privately initiated frontage improvement projects would only occur along frontage areas where new development has been initiated, the adjacent site would likely be unoccupied by active uses. However, undergrounding during roadway improvements could still be in proximity to noise-sensitive land uses. While the total impact area would be reduced relative to the Project, this alternative would continue to result in potentially significant and unavoidable construction noise and vibration impacts to residences and fragile structures; therefore, implementation of **MM-NOI-1** would still be required. This measure includes noise monitoring, distancing equipment from receptors, and noise barriers during construction as needed to reduce noise levels below the thresholds. Overall, impacts would be similar when compared to the Project.

Reduced Cultural and Biological Resources Impact Alternative

Biological Resources

The Reduced Cultural and Biological Resources Impact Alternative was designed to reduce or avoid indirect impacts to sensitive biological resources, including sensitive species, nesting birds, sensitive habitat, and jurisdictional habitats to the extent feasible. This would occur through limiting all Project activities, including pole removal, to be located outside areas adjacent to or with known sensitive resources to avoid potential indirect impacts. The Reduced Cultural and Biological Resources Impact Alternative would reduce or avoid the potential to result in significant indirect impacts to biological resources absent mitigation where the undergrounding areas are located adjacent to sensitive biological resources. Under this alternative, undergrounding activities would be limited to developed/disturbed areas that are not adjacent to known sensitive resources/MHPA. This

alternative would limit construction within required active nest buffers of an MHPA to only occur outside the breeding season to avoid indirect impacts to nesting birds and other sensitive species. Overall, impacts would be avoided when compared to the Project.

Historical, Archaeological, and Tribal Cultural Resources

As detailed in PEIR Section 4.4, the City includes many known historical and archaeological resources. In addition, the City has many areas where there is a high potential for unknown subsurface archaeological resources. The Reduced Cultural and Biological Resources Impact Alternative would avoid disturbances to known historical and archaeological resources, as well as areas identified to have moderately high or high sensitivity to cultural resources. However, this alternative's potential impact to unknown subsurface archaeological resources, human remains, and tribal cultural resources during proposed trenching activities would remain significant absent mitigation in other areas. Overall, impacts would be reduced when compared to the Project.

Noise

The Reduced Cultural and Biological Resources Impact Alternative would include temporary construction activities adjacent to existing uses. While the total impact area would be reduced relative to the Project, this alternative would continue to result in potentially significant and unavoidable construction noise and vibration impacts to residences and fragile structures; therefore, implementation of **MM-NOI-1** would still be required. This measure includes noise monitoring, distancing equipment from receptors, and noise barriers during construction as needed to reduce noise levels below the thresholds. Overall, impacts would be similar when compared to the Project.

7.6 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The environmental impacts of the Project, No Project: No Action Alternative, and Reduced Cultural and Biological Resources Impact Alternative are summarized in Table 7-1. As identified in Section 7.2.2, Significant Impacts, and detailed in Chapter 4, the Project could result in potentially significant impacts related to biological resources; cultural, historical, and tribal cultural resources; and noise. The No Project: No Action Alternative would reduce these significant impacts relative to the Project due to the reduction in undergrounding. However, the No Project: No Action Alternative would not completely avoid significant impacts of the Project considering undergrounding would continue without the Project. The Reduced Cultural and Biological Resources Impact Alternative would also reduce all significant impacts of the Project due to the reduction in undergrounding activities but, in addition, would reduce or avoid direct and indirect impacts to known cultural and biological resources.

The No Project: No Action Alternative would provide the greatest reduction in environmental impacts, as it would include the least amount of undergrounding activity. However, the No Project: No Action Alternative would fail to meet most of the Project objectives. Thus, the No Project: No Action Alternative would not be considered the environmentally superior alternative.

The Reduced Cultural and Biological Resources Impact Alternative would be considered the environmentally superior alternative, as it would meet the basic Project objectives while avoiding the potential for all direct and indirect biological resource impacts of the Project and reducing the potential for all direct and indirect cultural, tribal cultural, and historical resource impacts of the Project.

However, while the Project would result in greater impacts to biological and cultural resources due to the proximity to open space areas, the Project would reduce fire risk by removing aboveground utility infrastructure within and adjacent to open space areas. Consistent with Project Objective No. 1, the Project would result in greater benefits to public health, safety, and welfare of the general public by reducing the fire risk in open space areas as a result of undergrounding in these locations. Therefore, the Project should be considered the environmentally superior alternative.

Table 7-1
Impact Comparison: Project and Alternatives

Environmental Issue	Utilities Undergrounding Program	No Project: No Action Alternative	Reduced Cultural and Biological Resources Impact Alternative
Biological Resources	**Less than significant** with incorporation of mitigation measures	**Reduced** impacts due to fewer undergrounding projects occurring in undeveloped areas	**Reduced/avoided** impacts due to no projects occurring within or adjacent to undeveloped areas
Historical, Archaeological, and Tribal Cultural Resources	Potentially **significant and unavoidable** impacts related to historical resources, archeological resources, and tribal cultural resources after mitigation.	**Reduced** impacts due to fewer undergrounding projects occurring in undeveloped areas	**Reduced** impacts due to no undergrounding projects occurring within or adjacent to undeveloped areas

Table 7-1
Impact Comparison: Project and Alternatives

Environmental Issue	Utilities Undergrounding Program	No Project: No Action Alternative	Reduced Cultural and Biological Resources Impact Alternative
Noise	Potentially **significant and unavoidable** impacts related to construction noise with implementation of Mitigation Measure (MM) NOI-1 and potentially **significant and unavoidable** impacts related to vibration	**Similar** impacts due to potential proximity to noise-sensitive land uses	**Similar** impacts due to potential proximity to noise-sensitive land uses
Meets Most of the Basic Project Objectives?	**Yes**, to a greater degree than the Reduced Cultural and Biological Resources Impact Alternative	**No**, basic Project objectives would not be met	**Yes**, but to a lesser degree than the Project
Environmentally Superior Alternative	**Yes**, as it results in greater benefits to public health, safety, and welfare of the general public	**No**	**Yes**, as it relates to environmental impacts

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8 MANDATORY DISCUSSION AREAS

This chapter addresses significant environmental impacts that cannot be avoided if the City of San Diego (City) Utilities Undergrounding Program (Project) is implemented. It also addresses significant irreversible environmental changes that would be involved should the Project be implemented and growth-inducing impacts of the Project.

8.1 SIGNIFICANT EFFECTS THAT CANNOT BE AVOIDED

California Environmental Quality Act (CEQA) Guidelines Section 15126.2(c) requires an Environmental Impact Report (EIR) to identify significant environmental effects that cannot be avoided if a project is implemented. As discussed below, and in Sections 4.4 Cultural, Historical, and Tribal Cultural Resources and 4.6, Noise, of this Program EIR, implementation of the proposed Project would potentially result in significant and unavoidable impacts related to noise, excessive ground-borne vibration levels as well as to cultural and historic resources.

Noise

Construction noise impacts for activities implemented under the Program near sensitive receptors at horizontal distances closer than those identified in Table 4.6-4 (see Section 4.6, Noise, off this PEIR) would be potentially significant. With Implementation of MM-NOI-1, the potential for significant impacts resulting from construction noise occurring in close proximity to sensitive receptors would be reduced to a less than significant level. However, there may be circumstances where distances between sources of construction activity noise and the receiver are very close and would result in exposure levels that still exceed the City's threshold. For example, one of the construction noise prediction worksheets included as part of Appendix F shows that even with implementation of an 8-foot-tall temporary barrier between the direct sound path from source to receptor, there remain minimum distances within which noise exposures would exceed a 75 dBA 12-hour L_{eq} value. For this reason, and under such potential conditions of source-to-receiver proximity and construction equipment activity as studied herein for the Project, construction noise impacts may be **significant and unavoidable.**

Ground-borne vibration resulting from operation of some construction equipment types would result in excessive vibration exposure levels when occurring very close (i.e., distances identified in Table 4.6-5) to residential homes, fragile structures (e.g., historic resources), or buildings within which operation of vibration-sensitive instruments and processes occur. Therefore, the impact would remain **significant and unavoidable**.

Cultural, Historical, and Tribal Cultural Resources

The cultural resources inventory/evaluation report (Appendix D of Section 4.4) summarizes the cultural sensitivity analysis of all anticipated undergrounding projects in relation to the proposed Project activities. The undergrounding project boundaries, as they are currently known, were analyzed for their potential to impact cultural resources and assigned to sensitivity categories as described above. Should the boundary of the undergrounding projects be modified in the future, it is possible that their potential to impact cultural resources will change. If future planning should require the modification of their boundary, the modified project boundary must be reviewed by a qualified archaeologist. The archaeologist shall determine if the modified boundary is within the 2019 records search boundary, analyze the modified undergrounding project's potential to impact cultural resources, and assign it to the appropriate category to ensure that the appropriate mitigation is performed. Likewise, any new undergrounding projects must be reviewed by a qualified archaeologist, assessed whether the existing records search is sufficient or a new records search is required, and assigned to a sensitivity category based on its potential to impact cultural resources. These reviews are likely to be completed by City staff, but may also be assigned on a project specific basis to consulting archaeologists.

Therefore, impacts to cultural and historical resources as a result of implementation of Project activities, including undergrounding projects, would be potentially significant and **MM-CR-1** would need to be implemented. However, impacts would not be reduced below a level of significance. Impacts to cultural and historic resources would be **significant and unavoidable**.

In addition, despite areas of previous disturbance, Project activities that would include ground disturbance have the potential to impact human remains and impacts would be potentially significant and **MM-CR-1** would be required. However, even with implementation of mitigation, impacts would remain **significant and unavoidable**.

8.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES THAT CANNOT BE AVOIDED IF THE PROJECT IS IMPLEMENTED

Pursuant to CEQA Guidelines Section 15126.2(d), an EIR must consider any significant irreversible environmental changes that would be caused by a project should it be implemented. Specifically, the CEQA Guidelines describe significant irreversible environmental changes as follows (14 CCR 15126.2[d]):

> Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as a highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the

project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

Determining whether the proposed Project may result in significant and irreversible effects requires a determination of whether key resources would be degraded or destroyed in such a way that there would be little possibility of restoring them.

Large Commitment of Nonrenewable Resources

The Project would consist of the systematic conversion of overhead utilities to underground throughout the City. The activities proposed under the Project would be necessary for the City to proceed with Council Policy 600-08 for the Project, which is in the interest of public health and safety through improving individual project and region-wide planning efficiency and accuracy. Implementation of the proposed Project would require the use and consumption of nonrenewable resources, such as fossil fuels and maintenance materials, during construction of the Project. Fossil fuels in the form of diesel oil and gasoline would be used for equipment and vehicles. Electricity, which requires the burning of fossil fuels, would also be consumed during Project activities. Use of these energy resources would be irretrievable and irreversible. The non-recoverable materials that would be used during proposed maintenance activities would be accommodated by existing supplies, and their use would not constitute a large commitment of nonrenewable resources.

Irreversible Damage

Maintenance activities that result in loss or permanent degradation of an aspect of the physical environment that is nonrenewable have the most potential to result in irreversible changes. If any proposed maintenance activities were to damage or destroy unknown, unique paleontological or archaeological resources, destruction of these resources would be significant and irreversible. However, the City has determined where the areas of sensitivity are likely to be, and either the proposed maintenance activities would avoid these sensitive areas where resources are known, or the City would apply mitigation measures to avoid impacts to such resources. No irreversible impacts are anticipated from implementation of the proposed Project.

8.3 GROWTH-INDUCING IMPACTS

CEQA requires a discussion of ways a proposed project could be growth-inducing. The CEQA Guidelines identify a project as growth-inducing if it fosters economic or population growth or results in the construction of additional housing, either directly or indirectly, in the surrounding environment (14 CCR 15126.2[e]). New employees from commercial or industrial development and new population from residential development represent direct forms of growth. These direct forms of growth have a secondary effect of expanding the size of local markets and inducing additional economic activity in an area. A project could indirectly induce growth by reducing or removing

barriers to growth or by creating a condition that attracts additional population or new economic activity. However, a project's potential to induce growth does not automatically result in growth. Growth can only happen through capital investment in new economic opportunities by the private or public sector.

The proposed Project would consist of the systematic conversion of overhead utilities to underground throughout the City. Project-specific and program-level maintenance activities would likely be performed by existing City and private utility staff, which would not result in new population growth from outside the area. Therefore, the proposed Project would not directly or indirectly induce growth that would result in physical effects to the environment.

9 MITIGATION MONITORING AND REPORTING PROGRAM

California Environmental Quality Act (CEQA), Section 21081.6, requires that a mitigation monitoring and reporting program (MMRP) be established upon certification of an Environmental Impact Report (EIR). It stipulates that "the public agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment. The reporting or monitoring program shall be designed to ensure compliance during project implementation" (California Public Resources Code, Section 21000 et seq.).

This MMRP has been developed in compliance with Section 21081.6 of CEQA and identifies (1) project design features to reduce the potential for environmental effects; (2) mitigation measures to be implemented prior to, during, and after construction of the Utilities Undergrounding Program (Project); (3) the individual/agency responsible for that implementation; and (4) criteria for completion or monitoring of the specific measures.

9.1 GENERAL

During the plan check phase, and prior to issuance of a permit, the following shall be completed.

i. Prior to issuance of a Notice to Proceed or any construction permits, including but not limited to, the first Demolition Plans/Permits and Building Plans/Permits, the Assistant Deputy Director (ADD) Environmental Designee of the Land Development Review Division shall verify that all mitigation measures listed in this EIR have been included in their entirety on the submitted construction documents and contract specifications under the heading, "Environmental Mitigation Requirements." In addition, the requirements for a pre-construction meeting shall be noted on all construction documents.

ii. Prior to the commencement of work, a pre-construction meeting shall be conducted and shall include the City of San Diego's Mitigation Monitoring Coordination Section, Construction Manager, Resident Engineer, Building Inspector, Project Consultant, Applicant, and other parties of interest.

iii. Evidence of compliance with other permitting authorities is required, if applicable. Evidence shall include either copies of permits issued, letters of resolution issued by the Responsible Agency documenting compliance, or other evidence documenting compliance and deemed acceptable by the ADD Environmental Designee.

iv. Pursuant to Section 1600 et seq. of the State of California Fish and Game Code, evidence of compliance with Section 1602 is required, if applicable. Evidence shall include either copies of permits issued, letters of resolution issued by the Responsible Agency documenting

compliance, or other evidence documenting compliance and deemed acceptable by the ADD Environmental Designee.

9.2 SPECIFIC MITIGATION MONITORING AND REPORTING PROGRAM ISSUE AREA CONDITIONS/REQUIREMENTS

The following mitigation measures were included in the PEIR to reduce or avoid potentially significant impacts that could occur as part of the Project.

9.2.1 BIOLOGICAL RESOURCES

MM-BIO-1 Biological Resource Protection During Construction.

The following measures will be included in the construction plans for each undergrounding project in the Project that would affect Category 2 or 3 projects (these measures do not apply to Category 1 projects):

A. Biologist Verification – At least 3 days prior to the start of Project undergrounding activities within a district, the Project Biologist shall submit a letter to the City of San Diego (City) Mitigation Monitoring Coordination (MMC) section stating that a Project Biologist (Qualified Biologist), as defined in the City of San Diego's Biological Guidelines (2018), has been retained to implement the project's biological monitoring program. The letter shall include the names and contact information of all persons involved in the biological monitoring of the project.

B. Pre-Construction Meeting – The Qualified Biologist shall attend the pre-construction meeting, discuss the project's biological monitoring program, and arrange to perform any follow-up mitigation measures and reporting including site-specific monitoring, restoration or revegetation, and additional fauna/flora surveys/salvage.

C. Biological Documents – The Qualified Biologist shall submit all required documentation to the MMC verifying that any special mitigation reports, including, but not limited to, maps, plans, surveys, survey timelines, or buffers, are completed or scheduled per City Biology Guidelines, Multiple Species Conservation Program (MSCP), Environmentally Sensitive Lands (ESL) Ordinance, project permit conditions; California Environmental Quality Act (CEQA); endangered species acts (ESAs); and/or other local, state, or federal requirements.

   Prior to the start of construction on any Project utility within or immediately adjacent to the Multi-Habitat Planning Area (MHPA), the Environmental Designee (ED)/MMC shall verify that all MHPA boundaries and limits of work have been delineated on all construction documents.

D. BCME – The Qualified Biologist shall present a Biological Construction Mitigation/Monitoring Exhibit (BCME), which includes the biological documents in C above. In addition, the BCME

shall include the limits of work, proposed monitoring schedule, restoration/revegetation plans, plant salvage/relocation requirements (e.g., coastal cactus wren plant salvage, burrowing owl exclusions), avian or other wildlife surveys/survey schedules (including general avian nesting and U.S. Fish and Wildlife Service [USFWS] protocol), timing of surveys, wetland buffers, avian construction avoidance areas/noise buffers/ barriers, other impact avoidance areas, and any subsequent requirements determined by the Qualified Biologist and the City Assistant Deputy Director (ADD)/MMC. The BCME shall include a site plan, a written and graphic depiction of the project's biological mitigation/monitoring program, and a schedule. The BCME shall be approved by the MMC and referenced in the construction documents. Where the potential for impacts to biological resources is limited in Category 2 projects (i.e., initial field assessment indicates potential for impact to sensitive biological resources is low), the monitoring program may be limited to pre- and post-construction verification inspections with concurrence from the Project Biologist and MMC/ED. For utilities located in highly sensitive resource areas (Category 3), full-time biological monitors would be required. The BCME shall be approved by the MMC prior to the start of construction.

E. Avian Protection Requirements – To avoid any direct impacts to any species identified as a listed, candidate, sensitive, or special-status species in the MSCP, removal of habitat that supports active nests in the proposed area of disturbance shall occur outside of the breeding season for these species (February 1 to September 15). If removal of habitat in the proposed area of disturbance must occur during the breeding season, the Qualified Biologist shall conduct a pre-construction survey to determine the presence or absence of nesting birds on the proposed area of disturbance. The pre-construction survey shall be conducted within 10 calendar days prior to the start of construction activities (including removal of vegetation). The applicant shall submit the results of the pre-construction survey to the City MMC for review and approval prior to initiating any construction activities. If nesting birds are detected, a letter report in conformance with the City's Biology Guidelines (i.e., appropriate follow-up surveys, monitoring schedules, construction and noise barriers/buffers, etc.) shall be prepared and include proposed measures to be implemented to ensure that take of birds or eggs or disturbance of breeding activities is avoided. The report or mitigation plan shall be submitted to the City for review and approval and implemented to the satisfaction of the City. The City's MMC Section and Biologist shall verify and approve that all measures identified in the report are in place prior to and/or during construction.

F. Resource Delineation – Prior to construction activities, the Qualified Biologist shall supervise the placement of orange construction fencing or equivalent along the limits of disturbance adjacent to sensitive biological habitats and verify compliance with any other project conditions as shown on the BCME to ensure crews remain in the approved work areas. These demarcations will not be required for utility locations with existing structures, such as chain-link fencing, along the limits or utilities that are adjacent to urban and non-sensitive

habitat areas. This phase shall include flagging plant specimens and delimiting buffers to protect sensitive biological resources (e.g., habitats/flora and fauna species, including nesting birds) during construction. Appropriate care shall be taken to minimize attraction of nest predators to the site.

G. Pre-Construction Meeting/Education – Prior to the start of any activity where the construction plans for the proposed utility undergrounding work indicates that significant impacts to biological resources may occur, a pre-construction meeting shall be held on site with the following in attendance: the City's Project Manager (PM; or equivalent personnel), an MMC representative, the Project Contractor (PC) (if applicable), and the Qualified Monitoring Biologist (QMB). At this meeting, the QMB shall identify and discuss the mitigation measures that apply to the utility undergrounding activities and the sensitive nature of the adjacent habitat with the crew and PC.

   At the pre-construction meeting, the QMB shall submit to the MMC and City PM a copy of the BCME that identifies areas to be protected, fenced, and monitored. This data shall include all planned locations and design of noise attenuation walls or other devices, if applicable.

   Prior to commencement of utility undergrounding activities, the QMB shall also meet with the PC and the construction crew and conduct an on-site educational session regarding the need to avoid impacts outside of the approved work area and to protect sensitive flora and fauna that may occur at the specific utility location (e.g., explain the avian and wetland buffers and the flag system for removal of invasive species or retention of sensitive plants and clarify acceptable access routes/methods and staging areas).

H. Monitoring – All construction (including access/staging areas) shall be restricted to areas previously identified, proposed for development/staging, or previously disturbed as shown on "Exhibit A" and/or the BCME. The Qualified Biologist shall monitor construction activities as needed to ensure that construction activities do not encroach into biologically sensitive areas, or cause other similar damage, and that the work plan has been amended to accommodate any sensitive species located during the pre-construction surveys. In addition, the Qualified Biologist shall document field activity via the Consultant Site Visit Record (CSVR). The CSVR shall be emailed to the MMC on the first day of monitoring, the first week of each month, the last day of monitoring, and immediately in the case of any undocumented condition or discovery.

   If no deviations from the approved construction plan occur during work, no additional documentation is required. If deviations from the approved construction plan do occur, such as unanticipated impacts to sensitive vegetation communities or unanticipated discharge of pollutants, a Final Monitoring Report shall be prepared within 3 months following the

completion of mitigation monitoring efforts detailing construction and monitoring that occurred and any remedial or compensatory measures taken.

I. Subsequent Resource Identification – The Qualified Biologist shall note/act to prevent any new disturbances to habitat, flora, and/or fauna on site (e.g., flag plant specimens for avoidance during access). If active nests or other previously unknown sensitive resources are detected, all project activities that directly impact the resource shall be delayed until species-specific local, state, or federal regulations have been determined and applied by the Qualified Biologist.

   In the event that impacts exceed previously allowed amounts, additional impacts shall be mitigated in accordance with City Biology Guidelines, ESL and MSCP, State CEQA, and other applicable local, state, and federal laws. The Qualified Biologist shall submit a final BCME/report to the satisfaction of the City ADD/MMC within 30 days of construction completion.

MM-BIO-2 Handling of Non-Native Invasive Plant Species.

The following measure will be included in the construction plans for each undergrounding project in the Project that would affect Category 2 or 3 projects (this measure does not apply to Category 1 projects):

Where a project involves potential disturbance of non-native invasive plant species (as identified by the California Invasive Plant Council), these plants shall be entirely removed where feasible, and the removal shall be monitored by the Qualified Monitoring Biologist (QMB) to ensure that dispersal of propagules (e.g., seeds, stems) are avoided or minimized. Where removal of plant roots is not feasible (e.g., where erosive flows are predicted), aboveground plant material shall be fully removed and monitored by the QMB. Where aboveground plant material cannot be removed (e.g., due to limited access), herbicides shall be applied by a Licensed Pest Control Advisor, using chemicals permitted as safe within aquatic environments.

MM-BIO-3 MSCP/MHPA – Land Use Adjacency Guidelines.

The City of San Diego (City) shall accurately represent each project's design under the Project on construction plans in conformance with the associated Project, and the City's Multiple Species Conservation Program (MSCP) Land Use Adjacency Guidelines. The construction plans and subsequent review documents for districts that are considered adjacent to the Multi-Habitat Planning Area (MHPA) shall include the following:

Drainage

All new and proposed parking lots and developed areas in and adjacent to the preserve must not drain directly into the MHPA. All developed and paved areas must prevent the release of toxins,

chemicals, petroleum products, exotic plant materials, and other elements that may adversely affect the adjacent MHPA. Instead, runoff shall flow into sedimentation basins, grassy swales, or mechanical trapping devices prior to draining into the MHPA.

Stormwater systems shall be maintained approximately once a year, or as often as needed, to ensure proper functioning. Maintenance shall include dredging out sediments if needed, removing exotic plant materials, and adding chemical-neutralizing compounds (e.g., clay compounds) when necessary and appropriate.

Toxins

Land uses, such as recreation and agriculture, that use chemicals or generate by-products such as manure, that are potentially toxic or impactive to wildlife, sensitive species, habitat, or water quality shall incorporate measures to reduce impacts caused by the application and/or drainage of such materials into the MHPA.

Such measures shall include drainage/detention basins, swales, or holding areas with non-invasive grasses or wetland-type native vegetation to filter out the toxic materials.

Regular maintenance shall be provided.

Lighting

Lighting of all developed areas adjacent to the MHPA shall be directed away from the MHPA. Where necessary, development shall provide adequate shielding with non-invasive plant materials (preferably native), berming, and/or other methods to protect the MHPA and sensitive species from night lighting. Please see San Diego Municipal Code (SDMC) Section 142.0740 for further information if needed.

If lighting is required for nighttime construction, any nighttime lighting would be subject to City Outdoor Lighting Regulations per San Diego Land Development Code (LDC) Section 142.0740, to the maximum extent practicable, and shall be low pressure sodium illumination (or similar) and directed away from conserved habitat and the tops of adjacent trees with potentially nesting raptors, using appropriate placement and shielding.

Landscaping

No invasive non-native plant species shall be introduced into areas adjacent to the MHPA. The landscape plan shall be revised to remove invasive plant species, such as *Cortaderia selloana*, from the planting palette.

Grading/Land Development

Manufactured slopes associated with site development shall be included within the development footprint for projects within or adjacent to the MHPA.

Barriers

Development adjacent to the MHPA shall provide barriers where appropriate (e.g., non-invasive vegetation, rocks/boulders, fences, walls, and/or signage) along the MHPA boundaries to direct public access to appropriate locations and reduce domestic animal predation.

Brush Management

All Zone 1 brush management areas must be included within the development footprint and outside the MHPA. Brush management Zone 2 may be permitted within the MHPA (considered impact neutral) but cannot be used as mitigation.

The amount of woody vegetation clearing shall not exceed 50% of the vegetation existing when the initial clearing is done. Vegetation clearing shall be done consistent with SDMC Section 142.0412 and shall avoid/minimize impacts to covered species to the maximum extent possible. For all new development, regardless of the ownership, the brush management in the Zone 2 area will be the responsibility of a homeowners association or other private party.

Noise

Due to the site's location adjacent to (could also be within) the MHPA, construction noise will need to be avoided, if possible, during the breeding season of the coastal California gnatcatcher (March 1–August 15), least Bell's vireo (March 1–September 15), and southwestern willow flycatcher (May 1–August 30). If construction is proposed during the breeding season for the species, U.S. Fish and Wildlife Service protocol surveys will be required in order to determine species presence/absence.

If the species is/are not identified within the MHPA, no additional measures will be required. If present, measures to minimize noise impacts will be required and shall include noise attenuation measures (e.g. temporary noise walls/berms). If a survey is not conducted and construction is proposed during the species' breeding season, presence would be assumed, and noise attenuation measures (e.g. temporary wall/berm) would be required. Noise levels from construction activities during the bird breeding season shall not exceed 60 A-weighted decibels (dBA) hourly equivalent sound level (L_{eq}) at the edge of the occupied MHPA, or 3 dBA above the ambient noise level if noise levels already exceed 60 dBA hourly L_{eq}.

MM-BIO-4 Species-Specific Sensitive Plant Mitigation.

Surveys shall be conducted to determine presence/absence for species previously observed or identified as having high or moderate potential based on the presence of suitable habitat within or directly adjacent to Category 2 or 3 projects, prior to construction implementation. For species that can only be reliably detected during specific blooming periods, surveys may need to be conducted during those periods to determine presence/absence. If Multiple Species Conservation Program (MSCP) Narrow Endemic plant species, non-MSCP covered federally and/or state-listed plant species, or non-MSCP covered California Rare Plant Rank (CRPR) 1B.1 or 1B.2 (see table below) species are mapped within the proposed utility undergrounding, access, or staging areas, one of two equally suitable options shall be implemented:

Option 1: Construction undergrounding, access, and/or staging areas shall be modified to avoid or minimize direct impacts to mapped sensitive plant species.

Option 2: An approved Conceptual Restoration Plan shall be implemented or mitigation credits that provide one or more of the following measures shall be acquired:

- Impacted plants would be salvaged and relocated.
- Seeds from impacted plants would be collected for use at an off-site location.
- Off-site habitat that supports the species impacted shall be enhanced and/or supplemented with seed collected on site.
- Comparable habitat supporting the species at an off-site location shall be preserved.

Mitigation that involves relocation, enhancement, or transplanting sensitive plants may be conducted in combination with other habitat mitigation (e.g., wetlands Habitat Mitigation and Monitoring Plan) and shall include the following:

- Conceptual planting plan, including grading and temporary irrigation if necessary to create appropriate habitat conditions to support the species.
- Planting specifications (e.g., seed source, soil suitability, container size).
- Monitoring program including success criteria (e.g., a minimum number of sensitive plant individuals, a minimum percent cover of native species, a maximum percent cover of non-native species).
- Long-term maintenance and preservation plan (e.g., sensitive plant monitoring, adaptive management actions, site security from trespass or vandalism).

Table 9-1. Sensitive Plant Species Requiring Species-Specific or Habitat-Based Mitigation

Scientific Name	Common Name	Status (Federal/State/CRPR/MSCP)[1]
Significant, Habitat-Based Mitigation		
Acmispon prostratus	Nuttall's acmispon	None/None/1B.1/Covered
Adolphia californica	California adolphia	None/None/2B.1/None
Ambrosia chenopodiifolia	San Diego bur-sage	None/None/2B.1/None
Ambrosia monogyra	singlewhorl burrobrush	None/None/2B.2/None
Bergerocactus emoryi	golden-spined cereus	None/None/2B.2/None
Bloomeria clevelandii	San Diego goldenstar	None/None/1B.1/Covered
Brodiaea filifolia	thread-leaved brodiaea	FT/SE/1B.1/Covered
Brodiaea orcuttii	Orcutt's brodiaea	None/None/1B.1/Covered
Ceanothus verrucosus	wart-stemmed ceanothus	None/None/2B.2/Covered
Corethrogyne filaginifolia var. *linifolia*	Del Mar Mesa sand aster	None/None/1B.1/Covered
Dicranostegia orcuttiana	Orcutt's bird's-beak	None/None/2B.1/Covered
Dudleya attenuate ssp. *attenuata*	Orcutt's dudleya	None/None/2B.1/None
Dudleya viscida	sticky dudleya	None/None/1B.2/Covered
Ericameria palmeri var. *palmeri*	Palmer's goldenbush	None/None/1B.1/Covered
Eryngium aristulatum var. *parishii*	San Diego button-celery	FE/SE/1B.1/Covered
Euphorbia misera	cliff spurge	None/None/2B.2/None
Ferocactus viridescens	San Diego barrel cactus	None/None/2B.1/Covered
Iva hayesiana	San Diego marsh-elder	None/None/2B.2/None
Leptosyne maritima	sea dahlia	None/None/2B.2/None
Monardella viminea	willowy monardella	FE/SE/1B.1/Covered
Nama stenocarpa	mud nama	None/None/2B.2/None
Pinus torreyana ssp. *torreyana*	Torrey pine	None/None/1B.2/Covered
Pseudognaphalium leucocephalum	white rabbit-tobacco	None/None/2B.2/None
Rosa minutifolia	small-leaved rose	None/SE/2B.1/Covered
Salvia munzii	Munz's sage	None/None/2B.2/None
Senecio aphanactis	chaparral ragwort	None/None/2B.2/None
Significant, Species-Specific Mitigation		
Acanthomintha ilicifolia	San Diego thorn-mint	FT/SE/1B.1/Narrow Endemic
Ambrosia pumila	San Diego ambrosia	FE/None/1B.1/Narrow Endemic

Table 9-1. Sensitive Plant Species Requiring Species-Specific or Habitat-Based Mitigation

Scientific Name	Common Name	Status (Federal/State/CRPR/MSCP)[1]
Aphanisma blitoides	aphanisma	None/None/1B.2/Narrow Endemic
Atriplex coulteri	Coulter's saltbush	None/None/1B.2/None
Atriplex pacifica	south coast saltscale	None/None/1B.2/None
California macrophylla	round-leaved filaree	None/None/1B.2/None
Centromadia parryi ssp. *australis*	southern tarplant	None/None/1B.1/None
Centromadia pungens ssp. *laevis*	smooth tarplant	None/None/1B.1/None
Chorizanthe orcuttiana	Orcutt's spineflower	FE/SE/1B.1/None
Chorizanthe polygonoides var. *longispina*	long-spined spineflower	None/None/1B.2/None
Comarostaphylis diversifolia ssp. *diversifolia*	summer holly	None/None/1B.2/None
Corethrogyne filaginifolia var. *incana*	San Diego sand aster	None/None/1B.1/None
Cylindropuntia californica var. *californica*	snake cholla	None/None/1B.1/Narrow Endemic
Deinandra conjugens	Otay tarplant	FT/SE/1B.1/Narrow Endemic
Dudleya blochmaniae ssp. *blochmaniae*	Blochman's dudleya	None/None/1B.1/None
Dudleya variegata	variegated dudleya	None/None/1B.2/Narrow Endemic
Geothallus tuberosus	Campbell's liverwort	None/None/1B.1/None
Hazardia orcuttii	Orcutt's hazardia	None/ST/1B.1/None
Heterotheca sessiliflora ssp. *sessiliflora*	beach goldenaster	None/None/1B.1/None
Isocoma menziesii var. *decumbens*	decumbent goldenbush	None/None/1B.2/None
Lasthenia glabrata ssp. *coulteri*	Coulter's goldfields	None/None/1B.1/None
Monardella stoneana	Jennifer's monardella	None/None/1B.2/None
Navarretia fossalis	spreading navarretia	FT/None/1B.1/Narrow Endemic
Navarretia prostrata	prostrate vernal pool navarretia	None/None/1B.1/None
Phacelia stellaris	Brand's star phacelia	None/None/1B.1/None

Table 9-1. Sensitive Plant Species Requiring Species-Specific or Habitat-Based Mitigation

Scientific Name	Common Name	Status (Federal/State/CRPR/MSCP)[1]
Quercus dumosa	Nuttall's scrub oak	None/None/1B.1/None
Sphaerocarpos drewei	bottle liverwort	None/None/1B.1/None
Triquetrella californica	coastal triquetrella	None/None/1B.2/None

Notes: MSCP = Multiple Species Conservation Program.
Status Legend
Federal
FE: Federally listed as endangered
FT: Federally listed as threatened
State
SE: State listed as endangered
ST: State listed as threatened
CRPR: California Rare Plant Rank
1B: Plants rare, threatened, or endangered in California and elsewhere
2B: Plants rare, threatened, or endangered in California, but more common elsewhere
Threat Rank
0.1 – Seriously threatened in California (over 80% of occurrences threatened/high degree and immediacy of threat)
0.2 – Moderately threatened in California (20%–80% occurrences threatened/moderate degree and immediacy of threat)

MM-BIO-5 Avoidance of Listed Species Take.

Prior to the start of work for Category 2 or Category 3 projects, an analysis of sensitive species that have a moderate or high potential to occur within or adjacent to individual utilities must be conducted, based on life history and distribution of each species and presence of suitable habitat within or adjacent to the project.

5A: Coastal California Gnatcatcher, Least Bell's Vireo, and Southwestern Willow Flycatcher

Prior to any project pre-construction meeting associated with the Project, the Environmental Designee (ED)/Mitigation Monitoring Coordination (MMC) shall verify that Multi-Habitat Planning Area (MHPA) as well as any appropriate requirements regarding special-status birds, as specified below, are shown on the project's biological monitoring exhibit(s).

No construction activities shall occur within or adjacent to suitable habitat, as determined during subsequent review at District creation during the breeding seasons of coastal California gnatcatcher (March 1 to August 15), least Bell's vireo (March 15 to September 15), or southwestern willow

flycatcher (May 1 to September 1) until the following requirements have been met to the satisfaction of the Assistant Deputy Director (ADD)/MMC:

1. A Qualified Biologist (possessing a valid Endangered Species Act Section 10[a][1][a] Recovery Permit) shall survey those habitat areas within the MHPA that would be subject to construction noise levels exceeding 60 A-weighted decibels (dBA) hourly average for the presence of coastal California gnatcatcher, least Bell's vireo, and southwestern willow flycatcher. Surveys for these species shall be conducted pursuant to the protocol survey guidelines established by the U.S. Fish and Wildlife Service (USFWS) within the breeding season prior to the commencement of any construction. If coastal California gnatcatcher, least Bell's vireo, or southwestern willow flycatcher are present, then the following conditions must be met:
    a. From March 1 through August 15 for coastal California gnatcatcher, March 15 through September 15 for least Bell's vireo, and May 1 through September 1 for southwestern willow flycatcher, no clearing, grubbing, or grading of occupied habitat shall be permitted. Areas restricted from such activities shall be staked or fenced under the supervision of the qualified monitoring biologist; and
    b. From March 1 through August 15 for coastal California gnatcatcher, March 15 through September 15 for least Bell's vireo, and May 1 through September 1 for southwestern willow flycatcher, no construction activities shall occur within any portion of the site where construction activities would result in noise levels exceeding 60 dBA hourly average at the edge of occupied habitat. An analysis showing that noise generated by construction activities would not exceed 60 dBA hourly average at the edge of occupied habitat must be completed by a Qualified Acoustician (possessing current noise engineer license or registration with monitoring noise level experience with listed animal species) and approved by the ADD/MMC at least 2 weeks prior to the commencement of construction activities. Prior to the commencement of construction activities during the breeding season, areas restricted from such activities shall be staked or fenced under the supervision of the qualified monitoring biologist; or
    c. At least 2 weeks prior to the commencement of construction activities, under the direction of a Qualified Acoustician, attenuation measures (e.g., berms, walls) shall be implemented to ensure that noise levels resulting from construction activities would not exceed 60 dBA hourly average at the edge of habitat occupied by coastal California gnatcatcher, least Bell's vireo, and/or southwestern willow flycatcher. Concurrent with the commencement of construction activities and the construction of necessary noise attenuation facilities, noise monitoring shall be conducted at the edge of the occupied habitat area to ensure that levels do not exceed 60 dBA hourly average. If the noise

attenuation techniques implemented are determined to be inadequate by the Qualified Acoustician or Biologist, then the associated construction activities shall cease until such time that adequate noise attenuation is achieved or until the end of the breeding season (August 16 for coastal California gnatcatcher, September 16 for least Bell's vireo, and September 2 for southwestern willow flycatcher). Construction noise monitoring shall continue to be monitored at least twice weekly on varying days, or more frequently depending on the construction activity, to verify that noise levels at the edge of occupied habitat are maintained below 60 dBA hourly average or to the ambient noise level if it already exceeds 60 dBA hourly average. If not, other measures shall be implemented in consultation with the biologist and the ADD/MMC, as necessary, to reduce noise levels to below 60 dBA hourly average or to the ambient noise level if it already exceeds 60 dBA hourly average. Such measures may include, but are not limited to, limitations on the placement of construction equipment and the simultaneous use of equipment.

2. If coastal California gnatcatcher, least Bell's vireo, and/or southwestern willow flycatcher are not detected during the protocol survey, the permitted biologist shall submit substantial evidence to the ADD/MMC and applicable resource agencies that demonstrates whether or not mitigation measures such as noise walls are necessary between March 1 through August 15 for coastal California gnatcatcher, March 15 through September 15 for least Bell's vireo, and/or May 1 through September 1 for southwestern willow flycatcher, and adherence to the following is required:

   a. If this evidence indicates that the potential is high for coastal California gnatcatcher, least Bell's vireo, and/or southwestern willow flycatcher to be present based on historical records or site conditions, then Condition 1(a) through 1(c) shall be adhered to as specified above.

      If this evidence concludes that no impacts to this species are anticipated, no mitigation measures would be necessary.

5B: California Least Tern, Cactus Wren, Tricolored Blackbird, and Western Snowy Plover

If work is proposed at a utility where California least tern, cactus wren, tricolored blackbird, and/or western snowy plover are identified during subsequent review at District creation to have a moderate or high potential to occur, then an agency-approved biologist will perform the following duties prior to the start of construction:

1. The agency-approved biologist shall survey those habitat areas within the MHPA that would be subject to construction noise levels exceeding 60 dBA hourly average for the presence of California least tern, cactus wren, tricolored blackbird, and/or western snowy plover. As required by species, surveys shall be conducted pursuant to any approved protocol survey

guidelines established by USFWS or other authorized agency within the breeding season prior to the commencement of any construction. If California least tern, cactus wren, tricolored blackbird, and/or western snowy plover are determined to be present, then the following conditions must be met:

a. From March 1 to September 15 for western snowy plover, February 15 to August 15 for cactus wren, March 1 to August 1 for tricolored blackbird, and April 1 to September 15 for California least tern, no clearing, grubbing, or grading of occupied habitat shall be permitted. Areas restricted from such activities shall be staked or fenced under the supervision of the qualified monitoring biologist; and

b. From March 1 to September 15 for western snowy plover, February 15 to August 15 for cactus wren, March 1 to August 1 for tricolored blackbird, and April 1 to September 15 for California least tern, no construction activities shall occur within any portion of the site where construction activities would result in noise levels exceeding 60 dBA hourly average at the edge of occupied habitat. An analysis showing that noise generated by construction activities would not exceed 60 dBA hourly average at the edge of occupied habitat must be completed by a Qualified Acoustician (possessing current noise engineer license or registration with monitoring noise level experience with listed animal species) and approved by the ADD/MMC at least 2 weeks prior to the commencement of construction activities. Prior to the commencement of construction activities during the breeding season, areas restricted from such activities shall be staked or fenced under the supervision of the qualified monitoring biologist; or

c. At least 2 weeks prior to the commencement of construction activities, under the direction of a Qualified Acoustician, attenuation measures (e.g., berms, walls) shall be implemented to ensure that noise levels resulting from construction activities would not exceed 60 dBA hourly average at the edge of habitat occupied by western snowy plover, cactus wren, tricolored black bird, and California least tern. Concurrent with the commencement of construction activities and the construction of necessary noise attenuation facilities, noise monitoring shall be conducted at the edge of the occupied habitat area to ensure that levels do not exceed 60 dBA hourly average. If the noise attenuation techniques implemented are determined to be inadequate by the Qualified Acoustician or Biologist, then the associated construction activities shall cease until such time that adequate noise attenuation is achieved or until the end of the breeding season (September 16 for western snowy plover and California least tern, August 16 for cactus wren, and August 2 for tricolored blackbird). Construction noise monitoring shall continue to be monitored at least twice weekly on varying days, or more frequently depending on the construction activity, to verify that noise levels at the edge of occupied habitat are maintained below 60 dBA hourly average or to the ambient noise level if it already exceeds 60 dBA hourly average. If not, other measures shall be implemented in

consultation with the biologist and the ADD/MMC, as necessary, to reduce noise levels to below 60 dBA hourly average or to the ambient noise level if it already exceeds 60 dBA hourly average. Such measures may include, but are not limited to, limitations on the placement of construction equipment and the simultaneous use of equipment.

2. If western snowy plover, cactus wren, tricolored blackbird, and/or California least tern are not detected during the required survey(s), the permitted biologist shall submit substantial evidence to the ADD/MMC and applicable resource agencies that demonstrates whether or not mitigation measures such as noise walls are necessary during the specific breeding seasons for these species, and adherence to the following is required:

   a. If this evidence indicates that the potential is high for western snowy plover, cactus wren, tricolored blackbird, and/or California least tern to be present based on historical records or site conditions, then Condition 1(a) through 1(c) shall be adhered to as specified above.

      If this evidence concludes that no impacts to this species are anticipated, no mitigation measures would be necessary.

5C: Burrowing Owl

If work is proposed at a utility location where burrowing owl have been identified during subsequent review at District creation to have a moderate or high potential to occur, the following species-specific mitigation measure is required to meet Multiple Species Conservation Program (MSCP) Subarea Plan Conditions of Coverage. The mitigation measure would reduce potential impacts to burrowing owl and associated habitat located outside the MHPA (burrowing owl and associated habitat impacts within the MHPA must be avoided).

Prior to Permit or Notice to Proceed Issuance:

a. As districts within the Project have been determined to have burrowing owl occupation potential, the Permit Holder shall submit evidence to the Assistant Deputy Director of the City of San Diego (City) Entitlements verifying that a Biologist possessing qualifications pursuant to the California Department of Fish and Game (CDFG) 2012 Staff Report on Burrowing Owl Mitigation (hereafter referred as the CDFG 2012 Staff Report) has been retained to implement a burrowing owl construction impact avoidance program.

b. Prior to activities that would occur within or adjacent to habitat with potential to support burrowing owl, the Qualified Biologist shall attend the pre-construction meeting to inform construction personnel about the City's burrowing owl requirements and subsequent survey schedule.

Prior to Start of Construction:

a. The Permit Holder and Qualified Biologist must ensure that initial pre-construction/take avoidance surveys of the Project "site" are completed between 14 and 30 days before initial construction activities, including brushing, clearing, grubbing, or grading of the Project site, regardless of the time of the year. "Site" means the Project site and the area within a radius of 450 feet of the Project site. A report detailing the results of the surveys shall be submitted and approved by the Wildlife Agencies (i.e., USFWS and the California Department of Fish and Wildlife [CDFW]) and/or City MSCP staff prior to construction or burrowing owl eviction(s) and shall include maps of the Project site and burrowing owl locations on aerial photos.

b. The pre-construction survey shall follow the methods described in the CDFG 2012 Staff Report Appendix D.

c. 24 hours prior to commencement of ground-disturbing activities, the Qualified Biologist shall update and report results of pre-construction/take avoidance surveys. Verification shall be provided to the City's MMC Section. If results of the pre-construction surveys have changed and burrowing owl are present in areas not previously identified, immediate notification to the City and Wildlife Agencies shall be provided prior to ground-disturbing activities.

During Construction:

a. Best management practices shall be employed, as burrowing owls are known to use open pipes, culverts, excavated holes, and other burrow-like structures at construction sites. Legally permitted active construction projects that are occupied by burrowing owl and have followed all protocol in this mitigation section, or sites within 450 feet of occupied burrowing owl areas, shall undertake measures to discourage burrowing owls from recolonizing previously occupied areas or colonizing new portions of the site. Such measures include, but are not limited to, ensuring that the ends of all pipes and culverts are covered when they are not being worked on and covering rubble piles, dirt piles, ditches, and berms.

b. Ongoing burrowing owl detection – If burrowing owls or active burrows are not detected during the pre-construction surveys, Section "c" below shall be followed. If burrowing owls or burrows are detected during the pre-construction surveys, Section "d" shall be followed. Neither the MSCP Subarea Plan nor this mitigation section allows for any burrowing owls to be injured or killed outside or within the MHPA; in addition, impacts to burrowing owls within the MHPA must be avoided.

c. Post-Survey Follow-Up if Burrowing Owls and/or Signs of Active Natural or Artificial Burrows Are Not Detected During the Initial Pre-Construction Survey – Monitoring the site for new

burrows is required using the protocol in CDFG 2012 Staff Report Appendix D for the period following the initial pre-construction survey, until construction is scheduled to be complete and is complete. (NOTE: Using a projected completion date [that is amended if needed] will allow development of a monitoring schedule that adheres to the required number of surveys in the detection protocol.)

i. If no active burrows are found but burrowing owls are observed to occasionally (1–3 sightings) use the site for roosting or foraging, they shall be allowed to do so with no changes in the construction or construction schedule.

ii. If no active burrows are found but burrowing owls are observed, during follow-up monitoring or repeatedly (4 or more sightings), using the site for roosting or foraging, the City's MMC section shall be notified, and any portion of the site where owls have been sighted and that has not been graded or otherwise disturbed shall be avoided until further notice.

iii. If a burrowing owl begins using a burrow on the site at any time after the initial pre-construction survey, procedures described in Section "b" must be followed.

iv. Any actions other than these require the approval of the City and the Wildlife Agencies.

d. Post-Survey Follow Up if Burrowing Owls and/or Active Natural or Artificial Burrows Are Detected During the Initial Pre-Construction Survey – Monitoring the site for new burrows is required using the protocol in CDFG 2012 Staff Report Appendix D for the period following the initial pre-construction survey, until construction is scheduled to be complete and is complete. (NOTE: Using a projected completion date [that is amended if needed] will allow development of a monitoring schedule that adheres to the required number of surveys in the detection protocol.)

i. This section (d) applies only to sites (including biologically defined territory) wholly outside of the MHPA; all direct and indirect impacts to burrowing owls within the MHPA shall be avoided.

ii. If one or more burrowing owls are using any burrows (including pipes, culverts, debris piles, etc.) on or within 300 feet of the proposed construction area, the City's MMC section and MSCP Section shall be contacted. The City's MMC section shall contact the Wildlife Agencies regarding eviction/collapsing burrows and enlist the appropriate City biologist for ongoing coordination with the Wildlife Agencies and the qualified consulting burrowing owl biologist. No construction shall occur within 300 feet of an active burrow without written concurrence from the Wildlife Agencies. This distance may increase or decrease, depending on the burrow's location in relation to the site's topography, and other physical and biological characteristics.

e. Outside the Breeding Season – If the burrowing owl is using a burrow on site outside the breeding season (i.e., September 1 to January 31), the burrowing owl may be evicted after the qualified burrowing owl biologist has determined via fiber optic camera or other appropriate device, that no eggs, young, or adults are in the burrow. Eviction requires preparation of an Exclusion Plan prepared in accordance with CDFG 2012 Staff Report Appendix E (or most recent guide available) for review and submittal to the Wildlife Agencies. Written concurrence from the Wildlife Agencies is required prior to Exclusion Plan implementation.

f. During Breeding Season – If a burrowing owl is using a burrow on site during the breeding season (February 1 to August 31), construction shall not occur within 300 feet of the burrow until the young have fledged and are no longer dependent on the burrow, at which time the burrowing owls can be evicted. Eviction requires written concurrence from the Wildlife Agencies prior to implementation.

g. Survey Reporting During Construction – Details of construction surveys and evictions (if applicable) conducted shall be immediately (within 5 working days or sooner) reported to the City's MMC section and the Wildlife Agencies and must be provided in writing (as by email) and acknowledged to have been received by the required Wildlife Agencies and Development Services Department (DSD) staff member(s).

Post Construction:

a. Details of all the surveys and actions undertaken on site with respect to burrowing owls (i.e., occupation, eviction, locations, etc.) shall be reported to the City's MMC section and the Wildlife Agencies within 21 days post-construction and prior to the release of any grading bonds. This report must include summaries of all previous reports for the site and maps of the Project site and burrowing owl locations on aerial photos.

5D: Crotch's Bumble Bee

If work is proposed at a utility location where Crotch's bumble bee have been identified during subsequent review at District creation to have a moderate or high potential to occur, the following species-specific mitigation measure is required to minimize the potential for take of this state candidate endangered species. Should this species no longer be a state candidate for listing or state listed as threatened or endangered at the time of the pre-construction meeting or protocol surveys are completed and determine the species is absent from the project site, then this mitigation measures shall not be required.

1. Prior to the issuance of a Notice to Proceed (NTP) for any construction, the DSD Director's ED/MMC shall review and approve construction documents (plans, specification, details, etc.) to ensure the applicable mitigation monitoring and reporting program (MMRP) requirements are incorporated into the design.

a. To avoid impacts on Crotch's bumble bee, removal of habitat in the proposed area of disturbance must occur outside of the Colony Active Period between April 1 and August 31. If the removal of habitat in the proposed area of disturbance must occur during the Colony Active Period, a Qualified Biologist shall conduct a pre-activity survey no more than 3 days prior to the initiation of construction activities to determine the presence or absence of Crotch's bumble bee within the proposed area of disturbance.

b. Surveys must be conducted by a Qualified Biologist meeting the qualifications discussed in the CDFW guidance (i.e., Survey Considerations for CESA Candidate Bumble Bee Species, dated June 6, 2023).

c. The pre-activity survey shall consist of photographic surveys following CDFW guidance (i.e., Survey Considerations for CESA Candidate Bumble Bee Species, dated June 6, 2023). In coordination with CDFW, the Qualified Biologist may be required to send all photo vouchers to a CDFW-approved taxonomist to confirm the identifications of the bumble bees encountered during surveys. The surveys shall consist of passive methods unless a Memorandum of Understanding is obtained from CDFW. If additional activities (e.g., capture or handling) are deemed necessary to identify bumble bees of an unknown species that may be Crotch's bumble bee, then the Qualified Biologist shall obtain the required authorization via a Memorandum of Understanding or Scientific Collecting Permit pursuant to the CDFW 2023 Survey Considerations for CESA Candidate Bumble Bee Species. Survey methods that involve lethal take of species are not acceptable. Survey results will be considered valid until the start of the next colony active period.

d. If pre-activity surveys identify Crotch's bumble bee individuals on site, the Qualified Biologist shall notify and consult with CDFW to establish, monitor, and maintain no-work buffers around the associated floral resources or nest, as appropriate. The size and configuration of the no-work buffer shall be based on the best professional judgment of the Qualified Biologist in consultation with CDFW. Construction activities shall not occur within the no-work buffers until the bees appear no longer active (i.e., associated floral resources appear desiccated and no bees are seen flying for three consecutive days indicating dispersal from the area).

e. If Crotch's bumble bee are identified during species-specific surveys, the owner/permittee shall pursue an Incidental Take Permit from CDFW. Take of any endangered, threatened, or candidate species that results from the project is prohibited, except as authorized by state law (California Fish and Game Code Sections 86, 2062, 2067, 2068, 2080, 2085; 14 CCR 786.9) under the California Endangered Species Act (CESA). Mitigation for direct impacts to Crotch's bumble bee will be fulfilled through compensatory mitigation at a minimum 1:1 nesting habitat replacement of equal or better functions and values to those impacted by the project, or as otherwise determined through the Incidental Take Permit process.

f. Survey data shall be submitted by the Qualified Biologist to the California Natural Diversity Database (CNDDB) in accordance with the Memorandum of Understanding with CDFW, or Scientific Collecting Permit requirements, as applicable.

5E: Fully Protected Species

Fully protected species including white-tailed kite, California black rail, light-footed Ridgway's rail, and California least tern may not be taken or possessed except with take permit authorization from CDFW, and only under specific circumstances. Light-footed Ridgway's rail and California least tern are also listed as endangered by USFWS and would require federal take authorization if take is unavoidable.

If a moderate or high potential for these species is identified during subsequent review at District creation, focused wildlife surveys would be required. Category 1 projects would not require focused surveys for sensitive wildlife species due to lack of suitable habitat present and low potential for construction activities to impact listed species at the utility locations.

1. Prior to the issuance of any NTP, or pre-construction meeting, the City Deputy Director (or appointed designee) shall verify that the MHPA boundaries and the following project requirements regarding the fully protected species are shown on the construction plans where such construction occurs within suitable habitat for these species:

    a. Impacts to fully protected species shall be fully avoided. For construction sites that support suitable habitat for fully protected species, a qualified biologist shall remain on site during all vegetation clearing and perform periodic site inspections (1–2 times/week) during grading and vegetation removal activities. Should a fully protected species nest be detected, a buffer of a minimum of 500 feet shall be established, and no activity shall occur within the buffer zone until the biologist determines and CDFW confirms that all chicks have fledged and are no longer reliant on the nest site.

MM-BIO-6: Compensatory Mitigation

Mitigation ratios for permanent impacts to sensitive upland vegetation communities are determined by their location within or outside of the MHPA. Permanent impacts to wetlands require compensatory mitigation to replace acreage, functions, and services loss in accordance with the SDBG, including ratios for wetlands outlined in Table 2A and uplands in Table 3 of the SDBG. **MM-BIO-6a** and **MM-BIO-6b** apply to Category 3 utilities projects where unavoidable impacts to sensitive vegetation, including wetlands, have potential to occur. Impacts to sensitive vegetation communities or wetlands do not have potential to occur at Category 1 and 2 projects.

MM-BIO-6a: Compensatory Wetlands Mitigation

While not proposed as part of the Project, should any unplanned impacts to sensitive wetlands, including jurisdictional aquatic resources, occur from Project activities, including access and staging, those impacts shall be mitigated in one of the following two equally suitable options: (1) implementation of habitat creation, restoration, enhancement, and/or preservation through an approved Habitat Mitigation and Monitoring Plan (HMMP) or (2) acquisition of approved mitigation credits, including City of San Diego (City) Advanced Permittee Responsible Mitigation (APRM) sites.

Wetland mitigation required as part of any after-the-fact federal (Clean Water Act Section 404) or state (California Fish and Game Code Sections 1601 and 1603) wetland permit shall supersede and shall not be in addition to any mitigation identified in the Project's California Environmental Quality Act (CEQA) document for those wetland areas covered by any federal or state wetland permit. Wetland habitat outside the jurisdiction of the federal and state permits shall be mitigated in accordance with the CEQA document for those wetland areas covered under any federal or state wetland permit. Wetland habitat outside the jurisdiction of the federal and state permits shall be mitigated in accordance with the CEQA document.

Option 1: Should impacts to wetlands in the coastal zone occur, an HMMP shall be prepared and approved by the City prior to impacts, in accordance with the City of San Diego Municipal Code, Land Development Code—Biology Guidelines (SDBG). Mitigation shall conform with the SDBG, including definitions for creation, restoration, enhancement, and acquisition identified under environmentally sensitive lands (ESL), satisfaction of no net loss by including at least a 1:1 ratio of creation or restoration for all areas of significant impacts to wetlands (see Table 2A of the SDBG), and the protection and notice and management elements.

When proposed mitigation involves habitat enhancement, restoration, or creation, the HMMP shall include the following information:

- Conceptual planting plan including planting zones, grading, and irrigation
- Seed mix/planting palette
- Planting specifications
- Monitoring program including success criteria
- Long-term maintenance and preservation plan

For mitigation that involves habitat acquisition, the HMMP shall include the following:

- Location of proposed acquisition

- Description of the biological resources to be acquired, including support for the conclusion that the acquired habitat mitigates for the specific maintenance impact
- Documentation that the mitigation area would be adequately preserved and maintained in perpetuity

Option 2: Allocation of mitigation site credits, including City APRM, shall include the following:

- Location of approved mitigation site
- Description of the mitigation credits to be acquired, including support for the conclusion that the acquired habitat mitigates for the specific maintenance impact
- Documentation that the credits are associated with a mitigation bank or APRM site that has been approved by the appropriate Resource Agencies
- Documentation in the form of a current mitigation credit ledger

MM-BIO-6b Compensatory Uplands Mitigation.

Impacts to sensitive uplands from utility undergrounding activities, including access and staging, shall be mitigated in accordance with the applicable City Multiple Species Conservation Program (MSCP) mitigation ratios (see Table 3 of the SDBG) through restoration of habitat on site following completion of undergrounding work, through payment into the City's Habitat Acquisition Fund (Fund #10571) (for impacts that are small, isolated sites with lower long-term conservation value, generally considered less than 5 acres, but could, in some cases, may be considered up to 10 acres), as established by City Council Resolution R-275129, adopted on February 12, 1990, or through dedication of credits from the City's Cornerstone Lands Bank or Marron Valley Conservation Bank.

MM-BIO-7 Vernal Pool Avoidance, Minimization, and Mitigation.

The City of San Diego (City) shall implement avoidance and minimization measures in the undergrounding projects' design to ensure direct and indirect impacts to vernal pools are avoided, in accordance with the *Final City of San Diego Vernal Pool Habitat Conservation Plan* (VPHCP), Section 5.2. The City shall accurately represent each undergrounding project's design under the Project on construction plans in conformance with the associated permit conditions, the Project requirements, and the avoidance and minimization measures in Section 5.2 of the City's VPHCP. The construction plans and subsequent review documents for Category 2 or 3 projects that are considered to be adjacent to vernal pools with potential to indirectly impact these aquatic resources shall adhere to the following protocols, which are consistent with the measures listed in Section 5.2 of the City's VPHCP:

- All undergrounding projects that disturb soil adjacent to vernal pools shall require temporary fencing (with silt barriers) of the limits of project impacts (including construction staging areas and access routes) to prevent additional vernal pool impacts and prevent the spread of silt from the construction zone into adjacent vernal pools. Fencing shall be installed in a manner that does not impact habitats to be avoided. Final construction plans shall include photographs that show the fenced limits of impact and all areas of vernal pools to be impacted or avoided. If work inadvertently occurs beyond the fenced or demarcated limits of impact, all work shall cease until the problem has been remedied to the satisfaction of the City. Temporary construction fencing shall be removed upon project completion.
- Impacts from fugitive dust that may occur during construction grading shall be avoided and minimized through watering and other appropriate measures.
- All contractors and construction personnel shall be trained on the biological resources associated with this project, and it shall be ensure that construction personnel implement training. At a minimum, training shall include the following:

  (1) The purpose for resource protection

  (2) A description of the vernal pool species and their habitat(s)

  (3) The conservation measures that must be implemented during project construction to conserve the vernal pool species, including strictly limiting activities, vehicles, equipment, and construction materials to the fenced project footprint to avoid sensitive resource areas in the field (i.e., avoided areas delineated on maps or on the project site by fencing)

  (4) Environmentally responsible construction practices as outlined in measures 5, 6, and 7

  (5) The protocol to resolve conflicts that may arise at any time during the construction process

  (6) The general provisions of the project's mitigation monitoring and reporting program (MMRP), the need to adhere to the provisions of the Endangered Species Act (ESA), and the penalties associated with violating the ESA

    - Employees shall strictly limit their activities, vehicles, equipment, and construction materials to the fenced project footprint
    - Disposal or temporary placement of excess fill, brush, or other debris shall be limited to areas within the fenced project footprint.
    - Grading activities immediately adjacent to vernal pools shall be timed to avoid wet weather to minimize potential impacts (e.g., siltation) to the vernal pools unless the area to be graded is at an elevation below the pools. To achieve this goal, grading adjacent to avoided pools shall comply with the following:

      a. Grading shall occur only when the soil is dry to the touch both at the surface and 1 inch below. A visual check for color differences (i.e., darker soil indicating

moisture) in the soil between the surface and 1 inch below indicates whether the soil is dry.

b. After a rain of greater than 0.2 inches, grading shall occur only after the soil surface has dried sufficiently as described above, and no sooner than 2 days (48 hours) after the rain event ends.

c. To prevent erosion and siltation from stormwater runoff due to unexpected rains, best management practices (i.e., silt fences) shall be implemented as needed during grading.

d. If rain occurs during grading, work shall stop and resume only after soils are dry, as described above.

e. Grading shall be done in a manner to prevent runoff from entering preserved vernal pools.

f. If necessary, water spraying shall be conducted at a level sufficient to control fugitive dust but not to cause runoff into vernal pools.

g. If mechanized grading is necessary, grading shall be performed in a manner to minimize soil compaction (i.e., use the smallest type of equipment needed to feasibly accomplish the work).

If significant direct or indirect impacts to vernal pools, mitigation would be required in accordance with the City of San Diego Municipal Code, Land Development Code—Biology Guidelines (SDBG) and VPHCP, Sections 5.2 and 5.3 (Compensatory Mitigation), and will include the following:

1. The project proponent shall submit a vernal pool restoration/enhancement/ preservation plan to the City (Development Services Environmental Analysis Section and Planning Department Multiple Species Conservation Program Staff) and Wildlife Agencies (i.e., the California Department of Fish and Wildlife and the U.S. Fish and Wildlife Service) for approval as part of the review process, and the plan shall be included as an attachment to the project's permit documentation. The restoration plan shall be consistent (as applicable) with the restoration plan outline included in SDBG Attachment B. The plan must be approved and implemented prior to or concurrent with project impacts. In addition, the restoration plan shall include the information and conditions outlined in Section 5.3.2 of the VPHCP.
2. The project proponent shall ensure the long-term management of the on-site areas shall occur in perpetuity. Each project proponent shall implement a perpetual management, maintenance, and monitoring plan (e.g., Habitat Management Plan) for their respective biological conservation easement areas. The plan, which shall be approved by the City and Wildlife Agencies, and funding source must be established prior to, or concurrent with, impacts. The plan shall include, but not be limited to, the following: the method of protecting

the resources in perpetuity (i.e., covenant of easement dedication to the City, or a deed restriction or other conservation mechanism consistent with California Civil Code Section 815 et seq. and/or Government Code Section 65870) and acceptable to the Wildlife Agencies, monitoring schedule, measures to prevent human and exotic species encroachment, funding mechanism, and contingency measures should problems occur. In addition, the plan shall include the proposed land manager's name, qualifications, business address, and contact information. The project proponent shall also establish a nonwasting endowment or similar secure funding method in an amount approved by the City and the Wildlife Agencies based on a Property Analysis Record (PAR), or similar cost estimation method, to secure the ongoing funding for the perpetual long-term management, maintenance, and monitoring of the biological conservation easement area by an agency, nonprofit organization, or other entity approved by the City and the Wildlife Agencies.

3. In the event that a new occurrence of a covered species is identified (i.e., previously undocumented) within an area to be impacted by a covered project or covered activity, mitigation shall be required in the form of salvage and restoration for the impact to the new occurrence. Mitigation shall occur consistent with Conditions 1 and 2 above, as well as the SDBG.

9.2.2 HISTORICAL, ARCHAEOLOGICAL, AND TRIBAL CULTURAL RESOURCES

Cultural Resources and Tribal Cultural Resources

MM-CR-1 Archaeological and Tribal Cultural Resources

Prior to the issuance of any discretionary permit for a future development project that could directly and/or indirectly affect a cultural resource (i.e. archaeological and Tribal Cultural resources), the City shall require the following steps be taken to determine (1) the potential presence and/or absence of cultural resources, and (2) the appropriate mitigation for any significant resources that may be impacted. For the purposes of CEQA review, a cultural resource is defined in CEQA Guidelines Section 15064.5. Tribal Cultural resources are defined in Public Resources Code Section 21074.

Initial Determination

The City's Environmental Designee shall determine the potential presence and/or absence of cultural resources at the project site by reviewing site photographs and existing historic information (e.g., Archaeological Sensitivity Maps, the Archaeological Map Book, the California Historical Resources Inventory System, and the City's "Historical Inventory of Important Architects, Structures, and People in San Diego") and may conduct a site visit. A review of the cultural resources sensitivity map shall be done at the initial planning stage of a project to ensure that cultural resources are avoided and/or impacts are minimized to the extent feasible in accordance with the City's Historical

Resources Guidelines. The sensitivity levels described below shall guide the appropriate steps necessary to address the potential resources. Sensitivity ratings may be adjusted based on the amount of disturbance that has occurred, which may have previously impacted cultural resources, as well as new data available to the City.

> **High Sensitivity**: Indicates locations where significant cultural resources have been documented or would have the potential to be identified. High sensitivity resources include village and habitation sites and areas near fresh water sources. These resources may range from moderately complex to highly complex, with more defined living areas or specialized work space areas, and a large breadth of features and artifact assemblages. The potential for identification of additional resources in such areas would be high.
>
> **Moderate Sensitivity**: Indicates that some cultural resources have been recorded within the area or the area was developed before 1984 when CEQA review may not have been applied. Moderate sensitivity resources consist of diversity or density of feature and artifact types (e.g., a moderately dense lithic scatter).
>
> **Low Sensitivity**: Indicates areas where there is a high level of disturbance or development, and few or no previously recorded cultural resources are present based on records search results and due to the timing of development of the project site occurring after 1984 when CEQA would have been applied. Within these areas, the potential for additional resources to be identified would be low.

Phase I

Based on the results of the initial determination, if there is any evidence that the project area contains archaeological and/or tribal cultural resources, a site-specific records search and/or survey may be required and shall be determined on a case-by-case basis by the City's Environmental Designee. If a cultural resources study is required, it shall be prepared consistent with the City's Historical Resources Guidelines. All individuals conducting any phase of the cultural resources program shall meet the professional qualifications in accordance with the City's Historical Resources Guidelines. The cultural resources study shall include the background research conducted as part of the initial determination. This includes a record search at the South Coastal Information Center (SCIC) at San Diego State University. A review of the Sacred Lands File maintained by the Native American Heritage Commission (NAHC) shall also be conducted at this time. The cultural resources study shall include a field survey and/or an evaluation of significance, as applicable if cultural resources are identified, based on the City's Historical Resources Guidelines. Native American participation shall be required for all field work.

Phase II

Once a cultural resource (as defined in the Public Resources Code) has been identified, a significance determination shall be made. If a project were to impact areas identified as low sensitivity, it is assumed that any significant cultural resources no longer hold integrity or are not present. If a project impacts these areas, no additional mitigation measures shall be required.

If a project were to impact areas identified as moderate sensitivity, a site-specific records search and/or survey may be required on a case-by-case basis. If cultural resources are identified in the records search and/or survey, a significance evaluation for the identified cultural resources shall be required. If no significant resources are found and site conditions are such that there is no potential for further discoveries, then no further action shall be required. Resources found to be non-significant as a result of a survey and/or assessment shall require no further work beyond documentation of the resources on the appropriate Department of Parks and Recreation site forms and inclusion of the results in the survey and/or assessment report. If no significant resources are found, but results of the initial evaluation indicate there is still a potential for resources to be present in portions of the property, then mitigation monitoring shall be required. If the resource has not been evaluated for significance, a testing plan shall be required. If the resource is determined to be significant, a testing plan, data recovery plan, and mitigation monitoring shall be required.

If a project were to impact areas identified as high sensitivity, a survey and testing program may be required by the qualified archaeologist to further define resource boundaries subsurface presence or absence and determine the level of significance. A thorough discussion of testing methodologies including surface and subsurface investigations can be found in the City's Historical Resources Guidelines. The results from the testing program shall be evaluated against the Significance Thresholds found in the City's Historical Resources Guidelines. If significant cultural resources are identified within the area of potential effects, the site may be eligible for local designation.

Preferred mitigation for direct and/or indirect impacts to cultural resources is to avoid the resource through project redesign. If the resource cannot be entirely avoided, all prudent and feasible measures to minimize harm shall be taken. Mitigation measures such as, but not limited to, a Research Design and Archaeological Data Recovery Program (ADRP), construction monitoring, site designation, capping, granting of deeds, designation of open space, and avoidance and/or preservation shall be required and shall be determined by the City's Environmental Designee on a case-by-case basis.

Phase III

Archaeological Data Recovery Program (ADRP)

If a cultural resource is found to be significant and preservation is not an option, a Research Design and Archaeological Data Recovery Program (ARDP) shall be required, which includes a Collections Management Plan for review and approval by the City's Environmental Designee. The ADRP shall be based on a written research design and is subject to the provisions as outlined in Public Resources Code Section 21083.2. The ADRP shall be reviewed and approved by the City's Environmental Designee prior to distribution of a draft CEQA document.

Local Designation of Resources

The final cultural resource evaluation report shall be submitted to Historical Resources Board (HRB) staff for designation. The final cultural resource evaluation report and supporting documentation will be used by HRB staff in consultation with qualified City staff to ensure that adequate information is available to demonstrate eligibility for designation under the applicable criteria.

Monitoring and Archaeological Resource Reports

Archaeological monitoring may be required during building demolition and/or construction grading when significant cultural resources are known or suspected to be present on a site but cannot be recovered prior to grading due to obstructions such as, but not limited to, existing development, dense vegetation, or if a data recovery did not reduce the impact to the resource. Monitoring shall be documented in a consultant site visit record.

Native American participation shall be required for all subsurface investigations, including geotechnical testing and other ground disturbing activities whenever there is a tribal cultural resource or any archaeological site. In the event that human remains are encountered during data recovery and/or a monitoring program, the provisions of Public Resources Code Section 5097 shall be followed. In the event that human remains are discovered during project grading, work shall halt in that area and the procedures set forth in the Public Resources Code (Section 5097.98) and State Health and Safety Code (Section 7050.5), and in the federal, State, and local regulations described above shall be undertaken. These provisions shall be outlined in the Mitigation Monitoring and Reporting Program (MMRP) included in a subsequent project-specific environmental document. The Most Likely Descendent shall be consulted during the preparation of the written report, at which time they may express concerns about the treatment of sensitive resources.

Archaeological Resource Reports shall be prepared by qualified professionals as determined by the criteria set forth in Appendix B of the City's Historical Resources Guidelines. In the event that a cultural resource deposit is encountered during construction monitoring, a Collections Management

Plan shall be required in accordance with the project's MMRP. The disposition of human remains and burial related artifacts that cannot be avoided or are inadvertently discovered is governed by State (i.e., AB 2641 [Coto] and California Native American Graves and Repatriation Act [CalNAGPRA] of 2001 [Health and Safety Code 8010- 8011]) and federal (i.e., federal NAGPRA [USC 3001-3013]) law, and must be treated in a dignified and culturally appropriate manner with respect for the deceased individual(s) and their descendants. Any human bones and associated grave goods of Native American origin shall be turned over to the appropriate Native American group for repatriation, as identified by the Native American Heritage Commission.

Arrangements for long-term curation must be established between the applicant/property owner and the consultant prior to the initiation of the field reconnaissance, and must be included in the archaeological survey, testing and/or data recovery report submitted to the City for review and approval. Curation must be accomplished in accordance with the California State Historic Resources Commission's Guidelines for the Curation of Archaeological Collection (dated May 7, 1993) and, if federal funding is involved, Title 36 of the Code of Federal Regulations Part. Additional information regarding curation is provided in Section II of the Historical Resources Guidelines.

Historical Resources

MM-HR-1 Identification of Historical Resources. During UUP district creation, and as part of pre-construction planning, identification of designated historical resources (e.g. individual buildings/homes, historic districts) as well as potentially significant historical districts identified through City reconnaissance surveys will be conducted by the Project Engineer or other Utilities Undergrounding Program staff representative in consultation with Heritage Preservation staff to ensure proper review and permit processing. Available databases will be reviewed for designated historical resources (including historical districts). Structures and objects within the public right-of-way such as historic signs that are 45 years old or older may require evaluation for their historic significance by a qualified consultant if Heritage Preservation staff determines that the structure or object may have historic significance and if it is proposed to be demolished or altered by Program construction activities.

MM-HR-2 Project Design. To avoid impacts to designated historical resources as well as potentially significant historical resources 45 years old or older, the following design measures or additional reporting will be implemented by project proponents such as the Project Engineer whether the Program activity requires a permit or not. The project proponent may also initiate consultation with Heritage Preservation staff when modifications are proposed to buildings, structures and objects that are 45 years old or older and a permit is not required.

A. For all program activities within UUP Districts:

1. Modifications to primary or front (street facing) building facades shall be avoided. New or relocated electric service boxes and exterior conduits shall be located on side or rear building elevations.

2. Within front and street side yard areas, trenching for conduit installation should avoid demolition of hardscape elements from the original building's construction date/period such as masonry or concrete site walls, driveways, pathways and terraces where practical.

B. For all program activities within UUP Districts that are located on a property that contains a designated resource, or within the boundaries of a designated historical district or potential historical district identified in a City reconnaissance survey:

1. Repair and replacement of existing concrete curb, gutter and sidewalks should replicate historic design elements, including scoring patterns and unique colors. Historic sidewalk stamps within areas to be replaced should be photo documented, sawcut, and re-set in the same location or as close as possible in the same orientation.

9.2.3 NOISE

MM-NOI-1 Activities implemented under the Project shall be required to comply with the construction noise level limit defined by San Diego Municipal Code (SDMC) Section 59.5.0404. If construction noise would exceed this construction noise limit, a permit would be required from the Noise Abatement and Control Administrator (NACA) in accordance with SDMC Section 59.5.0404, which may include the incorporation of site-specific noise reduction measures to meet property line limitations. Such noise reduction measures may include implementation of any one or more of the following options:

A. Turn off idling equipment and vehicle engines when they are not engaged in performing work to advance project progress.

B. Locate and shield stationary noise sources such as generators, compressors, or pumps as far from the nearest noise-sensitive receivers of concern as feasible.

C. Construction equipment and vehicles shall, at all times, be properly outfitted and maintained with manufacturer-approved noise-reduction devices (e.g., exhaust mufflers) to minimize generated noise.

D. When loose materials are handled or transferred, such as rock, aggregate, or construction debris dumped into a container, the receiving metal walls of the

container shall include noise-dampening linings to minimize noise generation as materials make contact with their surfaces.

E. Material laydown and construction vehicle staging areas shall be located as far from noise-sensitive land uses (NSLUs) as feasible.

Additionally, advanced notification shall be provided to surrounding land uses within 100 feet of the project alignment. This disclosure shall include, at a minimum, the project construction schedule, including the various types of activities that would be occurring throughout the duration of the construction period. This notification shall give a contact phone number for any questions or complaints.

As needed and when practical, outdoor noise level monitoring would represent an available technique for evaluating the need for or the post-installation effectiveness of one or more implemented noise reduction measures and thus help ensure that aggregate sound emission from undergrounding project construction work performed by the contractor is in compliance with the City of San Diego's construction noise standard of 75 A-weighted decibel (dBA) equivalent sound level (L_{eq}) (12-hour). If measured noise levels attributed to typical project construction activity over a reasonable sampling period is found to be in exceedance of this standard, alternative methods (such as the use of quieter equipment or fewer pieces of equipment operating at any one time) or supplemental noise reduction means shall be implemented, as necessary.

Effectiveness of **MM-NOI-1** would, overall, depend on the specific equipment involved in the activity and the original condition of that equipment, the specific locations of the noise sources and the receivers, and other variables. Installation of a noise barrier, for example, would vary in effectiveness depending on the degree to which the line-of-sight between the source and receiver is broken, and typically ranges from 5 to 15 dB. Installation of more effective engine exhaust silencers could offer noise reduction improvements of several decibels. In combination, however, these measures would result in substantial decreases in noise generated from construction.

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None

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CHAPTER 7 ALTERNATIVES

None

CHAPTER 8 MANDATORY DISCUSSION AREAS

None

CHAPTER 9 MITIGATION MONITORING AND REPORTING PROGRAM

None

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